

# Letters



Florin Dănescu  
Executive President of Romanian association of banks  
4-6 Aleea Negru Voda, district 3  
Bucharest  
Romania

Brussels, 6 April 2021  
Ref: OUT2021-00066

**By e-mail only**

Dear Mr Dănescu,

Let me first of all thank you for your letter of 2 December 2020 to the European Data Protection Board (EDPB) and for the several inputs you have provided.

In your letter, you raise the importance of the interplay between the Anti- Money Laundering/Combating the Financing of Terrorism (AML/CFT) framework and the General Data Protection Regulation (“GDPR”), particularly in the context of Know Your Customer (KYC) procedures provided for by law.

As you may be aware, the EDPB has recently issued a statement on the protection of personal data processed in relation with the prevention of money laundering and terrorist financing<sup>1</sup>. In this statement we acknowledge the challenging nature of the issue, (also raised in the past by the Article 29 Working Party), in particular in respect of the far-reaching obligations on financial services providers and other obliged entities to identify and know their customers, to monitor transactions undertaken using their services, and to report any suspicious transactions.

The EDPB realises the relevance of the points raised by the Romanian Association of Banks and is grateful for the provided analysis. However, the concrete question raised in your letter appears to refer to a specific cooperation procedure to be developed and applied in Romania only. As this can relate to Romanian national law we suggest you to contact the Romanian Supervisory Authority competent for data protection (Autoritatea Națională de Supraveghere a Prelucrării Datelor cu Caracter Personal), which will be in the best position to advise you on this matter.

---

<sup>1</sup> The Statement has been adopted by the Board on the 17th of December 2020 and is available at the following link: [https://edpb.europa.eu/sites/edpb/files/files/file1/edpb\\_statement\\_20201215\\_aml\\_actionplan\\_en.pdf](https://edpb.europa.eu/sites/edpb/files/files/file1/edpb_statement_20201215_aml_actionplan_en.pdf)

At the same time, I would like to assure you that the Board shall remain concerned about the importance of ensuring the balance between the protection of personal data and the prevention of money laundering and terrorist financing.

Yours sincerely,



Andrea Jelinek