Privacy Policy
for the myRaiffeisen mobile app
Effective as of: 4 July 2024

1. General provisions

Dear Data Subject, please be informed that you can find detailed information on the data processing of Raiffeisen Bank Zrt. in our General Privacy Policy, available in the Bank's website; however, we think it is also important that we bring some distinguishing characteristics of this kind of data processing to your attention.

1.1. Controller: Raiffeisen Bank Zrt. (registered office: 1133 Budapest, Váci út 116-118.; company registration number: 01- 10-041042; tax number: 10198014-4-44)

1.2. Contact details of the Bank's data protection officer

In writing, in the form of a letter sent to the address Raiffeisen Bank Zrt. Budapest 1700	 **In-person at any branch of Raiffeisen Bank**
Electronically, by e-mail sent to info@raiffeisen.hu	**On the phone, at phone number 06-80-488-588**

The Bank's data protection officer is dr. Gergely Balázs.

2. The purpose and legal basis of processing, categories of processed data, retention period

2.1. Sales.UP

2.1.1. Processing purpose

a) In the Sales.UP application (hereinafter "Sales.UP") linked to the myRaiffeisen mobile application (the "Mobile App"), successful transactions and card blocks are stored with a view to the provision of the Transaction History service, and the same data are analysed by Sales.UP in order to provide the Analytics service. Such processing is necessary to enable the Bank to provide the Mobile App as a contractual service to the Customer in accordance with the contract concluded with the Customer.

b) Sales.UP profiles the Customers who use the Mobile App and who have consented to the processing of the data concerned, according to certain parameters. Profiling is done on the basis of parameters that determine the Customer's purchasing habits and circumstances, such as the Customer's internal bank identifiers and certain specific elements of their transaction history, the location and amount of the purchase, the type/identity of the seller.

On the basis of the data thus determined and used, Sales.UP creates a customer profile (the "Customer Profile") of the Customers concerned, enabling the Bank to conclude what financial needs the Customers concerned have/may have, which banking services may be the most suitable to meet their needs.
The purpose of the use and processing of the personal data forming the basis of the Customer Profile is to enable the Bank to provide the Customer concerned with preferential offers and personalised advertising based on the conclusions drawn from the Customer Profile.

2.1.2. Legal basis of the processing

The legal basis for the processing under Section 2.1.1. a) is the performance of the contract between the Bank and the Customer concerned pursuant to Article 6(1)(b) of Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation or GDPR).

The legal basis for processing pursuant to Section 2.1.1. b) is the consent of the Customer concerned pursuant to Article 6(1)(a) of the GDPR. Such consent may be withdrawn at any time free of charge, without restrictions and without giving any reason. The withdrawal of consent will not affect the lawfulness of any earlier data processing performed under such consent before the withdrawal.

2.1.3. Data subjects

Persons using the Mobile App.

2.1.4. Duration of the processing

The Bank shall retain the personal data processed in accordance with Section 2.1.1. a)—in accordance with Articles 56-59/A of Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (the "Money Laundering Act"), and Article 169 of Act C of 2000 on Accounting (the "Accounting Act")—for 8 years from the termination of the customer relationship.

The Bank shall retain the personal data processed in accordance with Section 2.1.1. b) until consent is withdrawn, otherwise—in accordance with Articles 56-59/A of the Money Laundering Act and Article 169 of the Accounting Act—for 8 years from the termination of the customer relationship.

2.1.5. Categories of processed data

The Customer's date of birth, gender, the Customer's account numbers, card types, account opening date, bank account transaction history, CRM communication target group and personalisation data.

2.1.6. Involvement of data processors

Please be informed that in the scope of the processing of personal data the following processors are engaged by the Bank:

- Raiffeisen Bank International AG (registered office: Am Stadtpark 9, 1030 Vienna, Austria)
- Amazon Web Services Inc. (registered office: 410 Terry Avenue North, Seattle, WA 98109-5210)
- Finshape Hungary Kft. (registered office: 1027 Budapest, Ganz utca 16., company registration number: 01-09-197531, tax number: 25062230-2-41)

2.1.7. Profiling

In the course of data processing pursuant to Section 2.1.1 b), the Bank profiles the Customers who have consented thereto. Pursuant to Article 21(2) of the GDPR, the data subject may object to processing based on profiling serving direct marketing purposes and withdraw his or her previously given consent to the processing in relation to the processing in question, by contacting the Bank using one of the contact details specified in Section 1.2 or in the Mobile App under the menu My user account/Privacy and security/Consents.

2.2. Carbon footprint statement

2.2.1. Processing purpose

The Sales.UP app linked to the Mobile App analyses, under the Transaction History service, the Customer's shopping habits by classifying each transaction into appropriate categories (e.g. food, housing, bills, utility charges, etc.). As a basis for the analysis, the Bank defines a carbon dioxide equivalent index ("CO_2e") for each category of banking transactions generated by the industry concerned, which may be considered as a measure of the carbon footprint. This index calculates the greenhouse gases that pollute the environment, such as carbon dioxide, methane, nitrous oxide and fluorinated gases. In the analysis, the Bank assigns the CO_2e level corresponding to the relevant category to the transaction carried out by the Customer and classified in the appropriate category.

Based on the sum of the CO_2e levels determined by the analysis for each transaction carried out, the Mobile App creates a monthly profile of the Customer, which allows the Customer to know the estimated approximate carbon footprint created as a result of his/her purchase behaviour (the "Carbon Footprint Statement").

The Mobile App will display the Carbon Footprint Statement to the Customer only if the Customer has made transactions totalling at least HUF 20,000 in the given month, and a sufficient number of transactions in the relevant categories (e.g. food, housing, bills, utility charges, etc.).

The purpose of the processing of data related to the Carbon Footprint Statement is to enable the Bank to inform the Customer, through the Mobile App, of the extent of his/her Carbon Footprint in relation to his/her purchasing habits.

2.2.2. Legal basis of the processing

The legal basis for processing is the legitimate interest of the Bank, pursuant to Article 6(1)(f) of the GDPR.

2.2.3. Data subjects

Persons using the Mobile App.

2.2.4. Duration of the processing

The Bank will retain the personal data until the end of the second year counted from the year of origination of the data.

2.2.5. Categories of processed data

The Customer's account numbers, card types, account opening date, bank account transaction history.

2.2.6. Profiling and the right to object

The Bank shall create a profile of the Customer for the purposes and in the manner set out in Section 2.2.1. In particular, the Customer has the right to object to data processing based on profiling, which means that the Customer may object to the processing of data in connection with the Carbon Footprint Statement. The Customer may exercise his/her right to object to the processing through the Bank's communication channels specified in Section 1.2.

2.2.7. Involvement of data processors

Please be informed that in the scope of the processing of personal data the following processors are engaged by the Bank:

- Raiffeisen Bank International AG (registered office: Am Stadtpark 9, 1030 Vienna, Austria)
- Amazon Web Services Inc. (registered office: 410 Terry Avenue North, Seattle, WA 98109-5210)
- Finshape Hungary Kft. (registered office: 1027 Budapest, Ganz utca 16., company registration number: 01-09-197531, tax number: 25062230-2-41)

2.3. Count.ly

2.3.1. Processing purpose

The Countly application running on the Mobile App (hereinafter "Countly") uses the customers' internal bank identifiers to generate reports and collect information for problem and error management and application development purposes. Through Countly, the Bank also keeps track of whether or not each message or offer sent by the Bank has been opened by the Customer.

2.3.2. Legal basis of the processing

The legal basis for processing is the legitimate interest of the Bank, pursuant to Article 6(1)(f) of the GDPR.

2.3.3. Data subjects

Persons using the Mobile App.

2.3.4. Duration of the processing

The Bank will retain the personal data for 1 year from the date of their origination.

2.3.5. Categories of processed data

The Customer's bank ID, ID assigned to the Mobile App, customer segment, the customer's role (e.g. account holder, authorised representative, etc.), customer activity within the Mobile App.

2.3.6. Involvement of data processors

Please be informed that in the scope of the processing of personal data the following processors are engaged by the Bank:

- Raiffeisen Bank International AG (registered office: Am Stadtpark 9, 1030 Vienna, Austria)
- Countly Ltd. (registered office: 9th Floor 107 Cheapside EC2V 6DN, London, UK, tax number: GB168599344)

2.4. Fraud Monitoring system

2.4.1. Processing purpose

In order to protect Customers against fraud, a fraud prevention system (the "Fraud Monitoring system") is in place at the Bank to detect and prevent unauthorised or fraudulent payment transactions and to detect applications and related actions that may put the funds in the Customer's account at risk.

The Fraud Monitoring system is based on the analysis of payment transactions, taking into account elements that are specific to the payment service user under the circumstances of normal use of personal identification data.

In order to achieve the above objective, the Bank uses the Fraud Monitoring system to detect and filter malicious activities carried out with the Customer's mobile device, which requires the processing of the Customer's personal data as defined in Section 2.3.5. During the operation of the Fraud Monitoring system, data concerning the usage log of the Customers' device using the Mobile App and the non-standard usage of the mobile devices are examined.

2.4.2. Legal basis of the processing

The legal basis for processing is the legitimate interest of the Bank, pursuant to Article 6(1)(f) of the GDPR.

2.4.3. Data subjects

Persons using the Mobile App.

2.4.4. Duration of the processing

The Bank will retain the personal data for 1 year from the date of their origination.

2.4.5. Categories of processed data

Client activities within the Mobile App, list of applications installed on the used mobile device at the time the Mobile App is used.

2.4.6. Involvement of data processors

Please be informed that in the scope of the processing of personal data the following processors are engaged by the Bank:

- Raiffeisen Bank International AG (registered office: Am Stadtpark 9, 1030 Vienna, Austria)
- Feedzai – Consultoria e Inovação Tecnológica, S.A. (registered office: Rua Pedro Nunes, IPN – Edif. Instituto Pedro Nunes, 3030-199 Coimbra, Portugal)

2.5. Adjust

2.5.1. Processing purpose

The Adjust application running in the Mobile App ("Adjust") uses the identifier of the device of the Customer using the Mobile App (the "Device ID") to generate reports and collect information to analyse user behaviour so that the Bank can improve the user experience and display targeted, personalised content through advertising systems. By user behaviour, the activities carried on within the app by the customer using the Mobile App, what button, box, etc. he or she clicks on, is meant.

2.5.2. Legal basis of the processing

The legal basis for processing is the consent of the data subject (Customer) pursuant to Article 6(1)(a) of the GDPR.

Such consent may be withdrawn at any time free of charge, without restrictions and without giving any reason. The withdrawal of consent will not affect the lawfulness of any earlier data processing performed under such consent before the withdrawal.

2.5.3. Data subjects

Persons using the Mobile App.

2.5.4. Duration of the processing

The Bank shall retain the personal data for 25 months from their origination, but no later than until the withdrawal of consent.

2.5.5. Categories of processed data

Device ID, Customer activities within the Mobile App.

2.5.6. Involvement of data processors

Please be informed that in the scope of the processing of personal data the following processors are engaged by the Bank:

- Raiffeisen Bank International AG (registered office: Am Stadtpark 9, 1030 Vienna, Austria)
- Adjust GmbH (registered office: Saarbrücker Str. 37a 10405 Berlin, Germany)

3. Rights of data subjects

Dear Data Subject, please note that you may be entitled to the rights of Data Subjects under the GDPR (e.g. rights of access, rectification, erasure, restriction, data portability and objection), taking into account the specificities of data processing, which rights are described in detail in the Bank's General Privacy Policy, in the section "Rights of the data subjects".

4. Legal remedies

In case you suppose that your rights to privacy have been violated, you may refer to the Bank's Data Protection Officer and inform him/her of the problem related to the Bank's data processing, as well as request information from him/her or ask for his/her opinion.

If you disagree with the opinion of the Bank's Data Protection Officer, but also regardless of that, upon any violation of your rights related to the protection of your personal data, you may refer your complaint to the Hungarian National Authority for Data Protection and Freedom of Information (registered office: 1055 Budapest, Falk Miksa utca 9-11., mailing address: 1363 Budapest, Pf. 9, telephone: +36-1-391-1400, fax: +36-1-391-1410, e-mail: ugyfelszolgalat@naih.hu) for remedy.

In case you suppose that your rights to privacy have been violated, you also have the right to refer to a court. You can bring the action before the court having jurisdiction and venue, that is, the court of the defendant's domicile or, at your choice, the court of the place where you live or reside. You may look up the court having jurisdiction in legal disputes related to data processing at the following link: https://birosag.hu/en.

5. Further information

The Bank shall have the right at any time to change the content of this policy in its sole discretion, without giving any special notice. Such changes are not governed by the provisions of Chapter XIX of the General Business Conditions.

For more detailed information, please refer to the privacy policies available in the website https://www.raiffeisen.hu/web/english under the heading Data Processing and Privacy Policy, the Bank's General Business Conditions, and the relevant statutory provisions, including in particular the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation or GDPR), and you may as well ask for information through any communication channel of the Bank as detailed above.

For issues that are not regulated—or not regulated in sufficient detail—here, the provisions relevant to this legal relationship of the General Privacy Policy, available in the Bank's website, shall be governing.