

Privacy Policy

for bank card tokenisation for online shopping at virtual Points of Sale (vPOS)

Effective as of: 21 November 2024

1. General provisions

Dear Data Subject, please be informed that you can find detailed information on the processing of your personal data by Raiffeisen Bank Zrt. (the "Bank") as a controller in our [General Privacy Policy](#), available in the Bank's website; however, we think it is also important that we describe in detail some distinguishing characteristics of this kind of data processing.

1.1. Controller: Raiffeisen Bank Zrt. (registered office: 1133 Budapest, Váci út 116-118.)



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

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

2. Virtual Points of Sale (vPOS) and bank card tokenisation

The Bank provides merchants operating online shops (the "**Merchant**") who have contracted with the Bank for this service with so-called virtual Points of Sale ("**vPOS**"). A vPOS enables a natural person (the "**Customer**") who wishes to make an online purchase in the Merchant's webshop to pay the fees arising in connection with the purchase, as well as the purchase price and other payment obligations simply, quickly and securely by entering his/her card details in the vPOS interface.

For Merchants who use this service, the Bank provides a card tokenisation service through the vPOS interface. Card tokenisation is a security procedure whereby the Bank uses the Customer's card details to generate a unique identifier (a so-called "token"). The token can be assigned or saved by the Customer to the user account created in the Merchant's online shop, and from then on, instead of entering his/her card details, the Customer can use this token to make card payment transactions in the given online shop. This also means that the actual card data will not be circulated, which reduces the risk of data theft and misuse.

3. Purpose and legal basis of the processing, Data Subjects, categories of processed data, and retention period of the data

3.1. Processing purpose

The purpose of the data processing is for the Bank to generate a token for the Customer, if requested by the Customer, to replace the card data. The token so generated can be assigned by the Customer to the user account created in the Merchant's webshop and the Customer can subsequently start a payment by card in the Merchant's webshop at any time on his/her own initiative or, if he/she has given his/her consent to the Merchant, on the Merchant's initiative (e.g. when using subscription services) without providing the Customer's card details.

3.2. Legal basis of the processing

Consent of the Customer as per Art. 6 (1) a) of the GDPR.

3.3. Data Subjects

The Customers.

3.4. Categories of processed data

Card number, cardholder's name, date of expiry of the card, CVV/CVC code (depending on the card type).

3.5. Retention period of the data

The Bank shall process the personal data processed until the withdrawal of consent, but not later than the last day of the validity period of the card.

4. Recipients

4.1. Processors

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

- Regional Card Processing Centre, s.r.o. (registered office: Námestie Mateja Korvína 1, 811 07 Bratislava - mestská časť Staré Mesto, Slovak Republic)

5. Rights of Data Subjects

Please note that you are entitled to the Data Subject rights under the GDPR, which are set out in the table below.

Data Subject right	Rights you are entitled to
Withdrawal of consent	You can amend or withdraw your consent at any time free of charge, without restrictions and without giving any reason. The withdrawal of your consent will not affect the lawfulness of any earlier data processing performed under such consent before the withdrawal.

Data Subject right	Rights you are entitled to
Right of access, right to information	<p>You may request information on whether the Bank processes your personal data and, if so, you may request that the Bank inform you regarding</p> <ul style="list-style-type: none"> - for what purpose, - what kind of personal data, - on what legal basis and - to whom are transmitted, and - for how long the data are processed. <p>If you have not provided your personal data to the Bank, you may request information about the source of the data.</p>
Right to rectification	<p>You have the right to request the rectification of inaccurate personal data relating to you and, upon your request, the Bank must rectify such inaccurate personal data without undue delay. The Bank may ask you to provide credible evidence of the accuracy of the personal data. You may also request the completion of incomplete personal data, taking into account the purpose of the processing.</p>
Right to erasure ("right to be forgotten")	<p>You have the right to request the deletion of your personal data, which the Bank must comply with without undue delay.</p> <p>The Bank is not obliged to delete your personal data even at your request if the processing of your personal data</p> <ul style="list-style-type: none"> - is required by an obligation under EU or Member State law (e.g. data processed under the Act on the Prevention of Money Laundering or the Act on Accounting); - is necessary for exercising the right of freedom of expression and information; - is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as erasure is likely to render impossible or seriously impair that processing; - is necessary for the establishment, exercise or defence of legal claims (e.g. the data are needed to be used as evidence in a judicial process). <p>In addition, the Bank is also obliged to delete personal data concerning you without undue delay if the conditions detailed in Article 17 of the GDPR prevail.</p>

Data Subject right	Rights you are entitled to
<p align="center">Right to restriction of processing</p>	<p>You have the right to ask the Bank to restrict the processing of your personal data, which means that you are required to clearly identify your personal data so that no further processing of your personal data can take place. Please note that you can request the restriction of your data if one of the following conditions is met:</p> <ul style="list-style-type: none"> - you dispute the accuracy of the personal data, in which case the restriction shall last until the Bank is able to verify their accuracy; - the processing is unlawful and you oppose the erasure of the data and request the restriction of their use instead; - the Bank no longer needs the personal data for the purposes of the processing, but you need them for the establishment, exercise or defence of legal claims; - you object to the processing, in which case the restriction will apply until it is established whether or not the Bank's legitimate grounds prevail over your legitimate grounds.
<p align="center">Right to data portability</p>	<p>You have the right to</p> <ul style="list-style-type: none"> - request the personal data concerning you, which you have provided to the Bank, in a structured, commonly used and machine-readable format; - transfer these personal data to another controller without the Bank having the right to obstruct this, provided that the processing is based on your consent or on a contract, and the processing is automated; - have the personal data transmitted directly from one controller (such as the Bank) to another, where technically feasible.

Please be further informed that you can find more details concerning the rights you are entitled to in the Bank's [General Privacy Policy](#), in the chapter "Rights of the Data Subjects".

6. 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: <http://birosag.hu/ugyfelkapcsolati-portal/illetekesegekkereso>.

7. 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 www.raiffeisen.hu/web/english under the heading [Data Processing](#), 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.