

Privacy Policy concerning the internal whistleblowing system

Effective as of: 20 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 particular 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



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 an e-mail sent to the address info@raiffeisen.hu



On the phone, at phone number 06-80-488-588

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

Please be informed that the Bank ensures the possibility for anonymous reporting under Act XXV of 2023 on Complaints and Notifications of Public Interest and on the Rules for Reporting Abuse (the "Complaints Act"); however, for a more effective investigation of the circumstances and feedback, it is recommended that you report by name. All whistleblowing reports are treated confidentially.

Anonymised information is information relating to unidentified or unidentifiable natural persons, as well as personal data that have been rendered anonymous in such a way that the data subject is no longer identifiable, i.e. the link between the data and the natural person can no longer be restored in any way.

According to Recital 26 of the GDPR, the material scope of the GDPR does not cover the processing of anonymous data, which means that in the case of this type of whistleblowing no processing under the GDPR will take place, and therefore the provisions of this policy do not apply to whistleblowing reports made anonymously.

If the whistleblower becomes identifiable on the basis of the information provided by him/her, the whistleblowing will not be considered anonymous, and the processing of his/her personal data will be governed by the provisions of this policy.

2. Processing purpose

The purpose of the processing is, pursuant to Article 26 (1) of the Complaints Act, to investigate the whistleblowing and to remedy or eliminate the conduct that is the subject of the whistleblowing; and to subsequently verify the adequacy of these (and of the related measures).

3. Legal basis of the processing

The legal basis for the processing is, pursuant to Article 6 (1) (c) of the GDPR, the fulfilment of the legal obligation of the Bank under Article 26 (1) of the Complaints Act; and the legitimate interest of the Bank in pursuing legal claims and subsequently verifying compliance, pursuant to Article 6 (1) (f) of the GDPR.

4. Data subjects

The Bank collects personal data on the following data subjects pursuant to Article 26 (1) a) to c) of the Complaints Act:

- natural persons within the meaning of Article 20 (2) a) to f) of the Complaints Act and their representatives (collectively, the "Whistleblower");
- the persons concerned by the whistleblowing, about whom the report contains information, e.g. whose conduct or omission gave rise to the whistleblowing (the "Person Concerned");
- persons with substantial information about the subject matter of the whistleblowing report (the "Person with Relevant Information");
- natural persons who are not entitled to whistleblowing under the Complaints Act but who report nevertheless (the personal data of these data subjects will be deleted by the Bank after their lack of entitlement is established).

5. Source of the processed data

The Bank may collect personal data from the following sources.

- The Whistleblower may serve as a source of personal data in relation to him/herself, as well as the Person Concerned and the Person with Relevant Information.
- The Person Concerned may serve as a source of personal data in relation to him/herself, as well as the Whistleblower and the Person with Relevant Information.
- The Person with Relevant Information may serve as a source of personal data in relation to him/herself, as well as the Whistleblower and the Person Concerned.

6. Categories of processed data

Pursuant to Article 26 (1) of the Complaints Act, only such personal data as are indispensable for the investigation of the whistleblowing are processed.

Accordingly, the Bank processes, inter alia, identification and contact data; and any additional personal data provided for the purpose of investigating the whistleblowing report and strictly necessary for the purpose of the processing.

The personal data contained in the minutes prepared on the interviews conducted in the course of the investigation procedure are also processed (e.g. place and time of the interview; data concerning the name, legal status and department of the interviewee; in what capacity the interviewee is present at the meeting, whether he/she is biased in relation to the subject matter of the case; the

subject of the interview; the questions asked and answers given during the interview; signatures). If the interview takes place over a recorded telephone line, the personal data processed shall also include, inter alia, the following: the voice recording; the date and time of the recording; and the conclusions that can be drawn about the data subject from the recording.

7. Retention of data

The Bank shall process personal data processed in connection with the whistleblowing until the end of the general limitation period as per Act V of 2013 on the Civil Code (5 years) from the date of rejection of the whistleblowing report, the closing of the investigation, the closing of the proceedings initiated on the basis of the whistleblowing report, or the adoption of the related measures.

8. Recipients

Please be informed that no processor is involved by the Bank in the processing.

Pursuant to Article 6 (2) to (4) of the Complaints Act, the personal data of the data subject may only be disclosed to a body competent to conduct the proceedings initiated on the basis of the whistleblowing, provided that such body is entitled to process the data by law or if the data subject has consented to the disclosure of the data. The personal data of the data subject shall not be publicly disclosed without his or her consent.

If it has become apparent that the Whistleblower has provided false data or information in bad faith and

- this may indicate that a crime or offence has been committed, his or her personal data must be handed over to the body or person responsible for the procedure;
- there are reasonable grounds to believe that he or she has caused unlawful damage or other legal harm to another person, his or her personal data must be handed over to the body or person entitled to initiate or conduct the proceedings, upon their request.

9. Rights of Data Subjects

Please note that you have the following Data Subject rights under the GDPR.

Data Subject right	Rights you are entitled to
Right of access	<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 it is not you who have provided your personal data to the Bank, you may request information about the source of the data.</p> <p>Pursuant to Article 26 (4) of the Complaints Act, the personal data of the Whistleblower may not be disclosed to the Person Concerned under the exercise of the latter's right of access.</p>

Data Subject right	Rights you are entitled to
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 mandatory 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>
Right to restriction of processing	<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.</p> <p>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.
Right to object	<p>You have the right to object at any time, on grounds relating to your particular situation, if you consider that the Bank is processing your personal data inappropriately for the purposes set out in this Privacy Policy. In such case, the Bank must demonstrate that the processing of the personal data is justified by compelling legitimate grounds which override the interests, rights and freedoms of the data subject or are related to the establishment, exercise or defence of legal claims.</p>

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".

10. 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>.

11. Further information

Pursuant to Article 27(1) of the Complaints Act, personal data may only be accessed by persons involved in the investigation of the whistleblowing report. The persons investigating the report may, pending the conclusion of the investigation or the initiation of formal charges as a result of the investigation, share the contents of the report and information on the data subjects with other departments or staff of the Bank to the extent strictly necessary for the conduct of the investigation, in addition to informing the data subjects.

The Bank shall have the right at any time to change the content of this Privacy 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 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.