

## Privacy Policy for the VideoBank service

Effective as of: 07 January 2025

### 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. and its subsidiaries** (collectively, the "Bank" or "Banking Group").

**Members of the Hungarian Banking Group** (for detailed information on the group members, see [this link](#)):

- Raiffeisen Bank Zrt. (registered office: 1133 Budapest, Váci út 116-118.)
- Raiffeisen Investment Fund Management Zrt. (registered office: 1133 Budapest, Váci út 116-118.)
- Raiffeisen Corporate Lízing 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](mailto:info@raiffeisen.hu)



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

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

### 2. Processing purpose

The purpose is to provide a possibility for online banking and for concluding contracts online for the Bank's existing customers in the advertised range, including:

- enabling the Bank to identify Customers through the new electronic channel called VideoBank using the personal security elements provided by the Customers previously, and in case the statutory requirements are met, to carry out customer due diligence in the case of new Customers,
- to record the customer's voice and facial image via VideoBank, his/her identity documents and the side of his/her address card including address data,

- c) to request the data necessary for the conclusion of the agreement and the making of legal statements, and other instruments and documents, and to give the required information to the Customer;
- d) in the case of the services available in the VideoBank platform, to perform the concluded agreements and ensure administrative tasks,
- e) to record the content and time of the legal statements, and the identity of the person making the statement in a retrievable manner, in compliance with the criteria concerning written form as per the rules of the civil law.

Considering that the content of the communication between the customer and the Bank or its representative becomes part of the contractual legal statement, and that the Bank is obligated to provide evidence of the provision of proper information during the communication, and of the occurrence of customer due diligence in the case of any official proceedings or a potential legal dispute, the Bank records the entire communication with the customer.

The Customer is free in each case to choose, and has freely chosen banking through the VideoBank platform. The Bank expressly points out that there is a way for in-person banking at branches, and in the case of certain services other sales channels are also available, subject to the relevant terms of contract.

When the connection is established, upon login to the VideoBank platform the Bank informs the Customer of the major data protection provisions, and where detailed information is available to the Customer.

Please take note that if there are several persons participating in the video conversation, e.g. co-debtors in order to hear the information jointly, the Bank shall process the data of these persons—where it follows from the nature of the service—jointly. If the Customer does not want this joint processing, the other persons are requested to do their banking in separate video calls. In order to achieve compliance with the legal requirements and the Bank's internal regulations, the Bank has the right to ask the customers to ensure that other persons—including especially persons not involved in the given transaction—do not participate in the video recording.

The Bank shall contact the customers and prospective customers using the contact data provided in the course of the use of the VideoBank application in case the Bank finds that technical difficulties have arisen in the use of the channel. Subject to the above processing purposes, the Bank provides technical assistance to its customers and prospective customers with a view to successful banking.

Please be informed that in the event our legal person customers wish to use the VideoBank channel for banking, the Bank shall process the data of the persons authorised to act on behalf of the company in accordance with the legal requirements concerning the protection of confidentiality and data protection. As regards the protection of the data of persons having power of representation, the Bank provides the same safeguards as are ensured in the case of natural person Customers. Please take note, however, that in case a natural person authorised to represent a legal person makes a legal statement on behalf of the legal person, the data shall also be processed as data belonging to that legal person, therefore the legal person shall have the right to access such data. The retention period of these data shall be adjusted to the retention periods governing for the legal relationship with the legal person and for the relevant data.

In the course of the banking transaction, and subsequently, the Bank will try to get feedback on the appropriateness of the channel used and of this way of administration. Customers may express their opinion anonymously as well as in a personalised manner on the appropriateness of the administration and the arrangement used. When processing such data, the Bank acts in compliance with the provisions of the [General Privacy Policy](#).

### 3. Legal basis of processing

Article 6 (1) b) of Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR): preparation, conclusion and performance of contract.

### 4. The categories of processed data

- Identification data of the natural person customer or prospective customer, data content of documents, customer's voice and facial image, contact details.
- Other documents and instruments made available by the customer or prospective customer.
- Content of the reconciliation between the customer or prospective customer and the Bank.
- Data of the service, order or transaction chosen by the customer or prospective customer.

### 5. Retention of data

The Bank shall process

- contractual declarations, and the related documentation (including image and voice recordings) for 8 years from the cessation of the contract or the claim arising from the contract, and
- the customer's identification data and contact details and the data related to customer due diligence for 8 years from the termination of the customer relationship,

in accordance with Art. 56-59 of Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing.

### 6. Data processing

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

- TechTeamer Kft. (registered office: 1095 Budapest, Lechner Ödön fasor 3. B. épület II/1., company registration number: 01-09-962028, tax number: 23362840-2-43)

### 7. Rights of data subjects

You shall have the right to request information through any of the above communication channels of the Bank at any time about the processing of your personal data, or access such data, and may furthermore request your personal data to be rectified, erased or restricted, and you are also entitled to the right to object to the processing of your personal data. For more details concerning your rights, see the Bank's [General Privacy Policy](#), in the chapter "Rights of the data subjects".

### 8. 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](mailto: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/illetekessegkereso>.

## **9. 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](http://www.raiffeisen.hu) under the heading [Legal declaration](#), 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.