

**Privacy Policy**  
**on the use of CCTV and access control systems**  
**in the Premises of RB Szolgáltató Központ**

Effective as of: 13 May 2024

## 1. General provisions

Dear Data Subject, please be informed that RB Szolgáltató Központ Kft. ("RBSC") is a wholly owned subsidiary of Raiffeisen Bank Zrt. (the "Bank"). You can find detailed information on the processing of your personal data by RBSC as a controller in the [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: RB Szolgáltató Központ Kft.** (registered office: 4400 Nyíregyháza, Órmester utca 4.; company registration number: 15-09-079787; tax number: 24096757-4-15)

### 1.2. Contact details of RBSC's data protection officer



In writing in the form of a letter sent to the address Raiffeisen Bank Zrt. Budapest 1700



In-person at the reception of the Premise



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

RBSC's data protection officer is dr. Gergely Balázs.

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

### 2.1. CCTV system

#### 2.1.1. Processing purpose

In order to ensure the smooth operation of its services, to protect human life, physical integrity, personal freedom and property, as well as to protect banking, securities, business and other legally protected secrets, and to prevent, detect and prove any internal abuse and fraud, RBSC installs and operates a CCTV system in its premises located at 4400 Nyíregyháza, Órmester utca 4. (the "Premises"), and uses it to capture and record images. Only authorised persons have access to the CCTV system and to the recorded footage, unauthorised persons cannot access such data. No data transfers are made to third countries or organisations.

#### 2.1.2. Legal basis of the processing

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

### **2.1.3. Data Subjects**

Persons entering and staying in the Premises. RBSC collects the personal data directly from the Data Subjects.

### **2.1.4. Categories of processed data**

The image of the Data Subject entering the area monitored by the CCTV system, his/her movements as shown in the footage, and any conclusions that can be drawn from these about the Data Subject, as well as the place and time of recording of the image.

### **2.1.5. Retention period of the of data**

RBSC will retain the personal data for 60 days after they have been recorded.

## **2.2. Access control system**

### **2.2.1. Processing purpose**

In order to ensure the smooth operation of its services, to protect human life, physical integrity, personal freedom and property, as well as to protect banking, securities, business and other legally protected secrets, and to prevent, detect and prove any internal abuse and fraud, RBSC installs and operates an access control system in the Premises.

RBSC determines the access rights to the Premises and to the individual rooms within the Premises according to the purpose of access—e.g. guest, contractual partner, employee—in a way that can be verified by the individual, therefore, prior to entering the Premises, RBSC asks the Data Subjects to identify themselves, and then an access card is made and given to the Data Subject, which allows him/her to enter the specified areas of the Premises.

In the access control system, we distinguish between two separate sets of data, one consisting of the personal data of the Data Subject, which are necessary for the operation of the access control system, and the other data set concerns movements; these data are generated during the operation of the access control system and are related to the Data Subject.

The access rights granted to the Data Subject may be temporary (e.g. guests) or permanent (e.g. contractual partners, employees).

Only authorised persons have access to the data recorded with the access control system, unauthorised persons cannot access such data. No data transfers are made to third countries or organisations.

### **2.2.2. Legal basis of the processing**

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

### **2.2.3. Data Subjects**

Data Subjects entering and staying in the area of the Premises protected by the access control system. RBSC collects the personal data directly from the Data Subjects.

#### **2.2.4. Categories of processed data**

Name, place and date of birth, mother's name and facial image of the Data Subject entering the Premises, his/her movements within the Premises, and any conclusions that can be drawn from these about the Data Subject.

#### **2.2.5. Duration of the processing**

The retention period for the personal data processed during the operation of the access control system varies for the different categories of Data Subjects.

- In the case of guests, RBSC keeps the data necessary for the operation of the access control system and generated during its operation for 90 days from the date of exit.
- In the case of employees and contractual partners, RBSC shall keep the data required for the operation of the access control system and generated in the course of its operation for 3 years from the termination of the employment or contractual relationship with the Bank or RBSC.

### **3. Involvement of data processors**

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

- Árgus-Security Kft. (registered office: 1024 Budapest, Lövőház utca 9. 1/11; company registration number: 01-09-367675; tax number: 12018066-2-41)

### **4. 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 Data Subject Rights.

### **5. Legal remedies**

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

If you disagree with the opinion of RBSC'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>.

## 6. Further information

RBSC shall have the right at any time to change the content of this policy in its sole discretion, without giving any special notice.

For more detailed information, please refer to the privacy policies available in the website [www.raiffeisen.hu](http://www.raiffeisen.hu) under the heading [Data protection and privacy policy](#), 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.