

## **Privacy Policy** **for online banking and account opening services**

Effective as of 15 January 2025

### **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 describe the distinguishing characteristics of this peculiar process in this policy in detail.

**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 <a href="mailto:info@raiffeisen.hu">info@raiffeisen.hu</a>	 On the phone, at phone number 06-80-488-588

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

### **2. Purpose of the processing**

The Bank offers its prospective and existing Customers (hereinafter collectively referred to as the "Customer") the possibility of online banking and contract conclusion by video call. For the purpose of Customer identification and Customer due diligence, the Bank records the Customer's image, voice and an image of the Customer's identification document, and the address page of his/her address card by means of a so-called audited electronic means of communication (camera and related audited and closed systems), then compares the image on the document with the Customer's image, and in order to verify the authenticity of the extracted personal data compares these with the data contained in the certified public personal data and address records.

The Bank also records the audio of the conversation conducted by the customer or prospective customer in order to ensure the retrievability of the circumstances of the conclusion of the contract and the exact content of the contract.

The processing of data is also intended to enable the Bank, through the processing implemented within the framework of the online banking and account opening service, to negotiate with the Customer for the purpose of the preparation, conclusion and amendment of a contract, and to conclude the contract, where appropriate, as well as to comply with its legal obligations<sup>1</sup> related to the contract conclusion process, and to provide any other services requested by the Customer.

The Customer may voluntarily choose to use online services, but if he/she does not wish to use this channel, he/she may contact the Bank through other channels as well, provided that the service he/she wishes to use is also available that way, e.g. in person at any branch, by telephone, etc.

The Bank provides the online services through a cloud-based solution. Cloud service providers are outsourcers and they contractually guarantee compliance with the law, in particular with regard to the security, integrity, availability and confidentiality of the data.

If the Bank receives an indication that the Customer is stuck in the process, it will contact the Customer through one of the channels provided, and will provide technical assistance to facilitate the use of the online channel.

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

The legal basis for the processing is the preparation and performance of the contract between the Bank and the customer pursuant to Article 6(1)(b) of the GDPR, and the fulfilment of the legal obligations of the Bank in relation to the conclusion of the contract pursuant to Article 6(1)(c) of the GDPR.

### **4. Data subjects**

The data subjects are those prospective customers of the Bank and those customers already having a contractual relationship with the Bank who use the online banking and account opening service.

### **5. Duration of the processing**

The Bank shall retain the personal data processed—in accordance with Articles 56-59/A of the Money Laundering Act and Act C of 2000 on Accounting—for 8 years from the termination of the customer relationship.

In the event that the conclusion of the contract fails, the Bank will retain the personal data processed for 2 years from the date of the failure.

### **6. Categories of processed data**

Family name and given name; date and place of birth; gender; nationality; e-mail address; telephone number; type of identity document; identity document number; expiry date of identity document; address card number; address card issue date; postal address; copies of documents; photo; voice; data concerning tax residence; data indicating the capacity of the data subject as a politically exposed person; data on the service chosen; other documents and records provided by the prospective customer or customer, the content of the discussion between the prospective customer or customer and the Bank; data on the service, order or transaction chosen or used by the prospective customer or customer; answers given by the customer in the declarations.

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<sup>1</sup> Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (the "Money Laundering Act"); Act XIX of 2014 on the Improvement of International Tax Compliance between Hungary and the United States of America (the "FATCA Act"); Act CXC of 2015 on the Promulgation of the Multilateral Agreement between the Competent Authorities on the Automatic Exchange of Financial Account Information; Act XXXVII of 2013 on Certain Rules of International Administrative Cooperation in Relation to Taxes and Other Public Charges; Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises (the "Banking Act").

## 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)

## 8. 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".

## 9. 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/illeteksegkereso>.

## 10. Further information

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](http://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.