

## Privacy Policy on the use of the GIRinfo Data Processing Service

Effective as of 14 June 2024

### 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.; company registration number: 01-10-041042; tax number: 10198014-4-44)

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



In writing in the form of  
a letter sent to the



In-person at any branch  
of Raiffeisen Bank



Electronically by an e-  
mail sent to the address



On the phone at phone  
number

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

### 2. Purpose of the processing

The purpose of the processing is that by retrieving data recorded in certified public records we help

- to conclude your contract online more conveniently and securely;
- the accurate recording of the information contained in your identity document and address card that are necessary for the contracting;
- your reliable identification in order to prepare customer due diligence tasks in accordance with the provisions of Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (the "Money Laundering Act").

To this end, the Bank uses the GIRinfo Data Processing Service (the "Service") of GIRO Zrt. (registered office: 1054 Budapest, Vadász u. 31., company registration number: 01-10-041159, the "Processor"). The Service is subject to your consent to the transfer of your personal data, as well as your data qualifying as banking and securities secret, to the Processor, so that the Processor can retrieve your personal data from the databases indicated in this policy and transfer the same to the Bank.

The query shall be performed by the GIRinfo Data Processing Service, through secure access to the databases operated by the database administrators identified below:

- Road Transport Register—Ministry of Interior Deputy State Secretariat for Data Registers ("BM NYHÁT");
- Register of travel documents—BM NYHÁT;
- Register of personal data and addresses—BM NYHÁT.

More information about the Service is available at [GIRO Zrt.](#)

The processing of data related to the above query is part of the Bank's online contracting process, which you are free to choose. If you do not wish to do this and do not agree to the query, we will not be able to proceed with the online account opening process; however, you can request a callback and choose to open the account in person at any of our branches. The Bank expressly points out that in the branches it is also possible to do the customer due diligence process in person, and conclude a contract, which does not include querying the databases indicated, or using the GIRinfo service.

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

The legal basis for the processing is your freely given consent pursuant to Article 6(1)(a) of the GDPR, with regard to the provisions concerning banking secrecy of Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises (the "Banking Act").

### **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 Bank's services.

### **5. Categories of processed data**

Family name and given name; date and place of birth; nationality; type of identity document; number of identity document; expiry date of identity document; photograph; address card number; date of issue of address card; permanent address; temporary address; copies of documents.

### **6. Retention of data**

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.

The withdrawal of consent will not affect the lawfulness of any earlier data processing performed under such consent.

### **7. Involvement of data processors**

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

- GIRO Zrt. (registered office: 1054 Budapest, Vadász u. 31., company registration number: 01-10-041159)

## **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. The lawsuit shall be adjudicated by the competent court having jurisdiction at the registered office of the defendant or, if you prefer, by the court having jurisdiction at your residential address or place of stay. 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 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](#).

If you need more 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 at 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.