

## Privacy Policy

### on the management of Tesco Clubcard points earned through the use of Raiffeisen Bank's products and services

Effective as of: 2 December 2024

#### 1. General provisions

The purpose of this Privacy Policy is to inform you about how **Raiffeisen Bank Zrt.** (registered office: 1133 Budapest, Váci út 116-118.; hereinafter "**Raiffeisen Bank**") and **TESCO-GLOBAL Zrt.** (registered office: 2040 Budaörs, Kinizsi út 1-3.; hereinafter "**Tesco**") (Tesco and Raiffeisen Bank hereinafter collectively the "**Parties**" or the "**Controllers**") process your personal data in the processing and crediting of the Tesco Clubcard points earned by you in connection with the use of Raiffeisen Bank's products and services.

Please note that this Privacy Policy applies only to the joint processing activities carried on in the cooperation between the Parties. You can access and familiarise yourself with the respective privacy policies applicable to the data processing activities related to the [Tesco Clubcard loyalty programme](#) and [Raiffeisen Bank's products and services](#) via the links provided.

##### 1.1. Contact details of the data protection officers

If you have any questions about the Parties' joint data processing activities, please contact **Raiffeisen Bank's** data protection officer, in writing in the form of a letter sent to Raiffeisen Bank Zrt. at Budapest 1700, in person at any Raiffeisen Bank branch, by e-mail to [info@raiffeisen.hu](mailto:info@raiffeisen.hu), or by telephone at phone number 06-80-488-588, or you may as well contact **Tesco's** data protection officer in writing in the form of a letter sent to the address 2040 Budaörs, Kinizsi út 1-3., or by e-mail to [ce.dpo@tesco.com](mailto:ce.dpo@tesco.com).

#### 2. Joint controllers and details of joint processing activities

##### Your personal data are processed by Tesco and Raiffeisen Bank as joint controllers.

Tesco and Raiffeisen Bank have signed a joint controller agreement (the "**Agreement**"), setting out their rights and obligations in relation to their activities as joint controllers. In the course of the data processing, Raiffeisen Bank collects your Clubcard number from you and keeps a record of the Clubcard points earned when you use Raiffeisen Bank products and services, which information is transferred by Raiffeisen Bank to Tesco so that the Clubcard points will be credited to your account. The Parties' joint controller agreement does not affect your right to contact either of the Data Controllers with a request regarding the joint processing activities.

#### 3. Processing purpose

Your personal data will be processed so that Raiffeisen Bank can determine the Tesco Clubcard points you have earned in relation to the products sold by Raiffeisen Bank at the Raiffeisen Financial Partner Points located in Tesco stores, in accordance with the contract concluded with you, and transfer them to Tesco so that they will be credited to your account. On the basis of the statement transmitted by Raiffeisen Bank, the processing of your personal data included in the statement by Tesco is necessary for Tesco to validate and credit your Clubcard points.

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

The legal basis for the processing is the performance of the contract between Raiffeisen Bank and you pursuant to Article 6 (1) (b) of the GDPR.

The provision of your personal data is necessary for the performance of the contract between Raiffeisen Bank and you, without which we will not be able to keep record of the Clubcard points you have collected and arrange that they are credited to your account.

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

Your Clubcard number, and the number of Clubcard points you have earned and which are to be credited to your account.

#### **6. The source of personal data**

You provide your personal data directly in the course of Raiffeisen Bank's processing operations.

In the course of the data processing activities carried out by Tesco for the purpose of crediting Clubcard points, the Clubcard points collected by you and to be credited to you, and the corresponding Clubcard numbers, are transferred by Raiffeisen Bank to Tesco.

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

Your Clubcard number and the Clubcard points to be credited to you will be retained until the expiry of the limitation period set out in Act V of 2013 on the Civil Code (the "Civil Code"), i.e. for 5 years from the termination of the contract between you and Raiffeisen Bank.

The data generated in connection with the Agreement and considered as accounting documents shall be retained for 8 years from the termination of the Agreement between Raiffeisen Bank and Tesco pursuant to Article 169 of Act C of 2000 on Accounting (the "Accounting Act").

#### **8. Recipients**

##### **8.1. Processors**

**Tesco** shall involve the following data processors (hereinafter collectively the "**Processors**") in the processing of data:

- TESCO Stores ČR a.s. (registered office: Vršovická 1527/68b, 100 00 Prague 10, Czech Republic; activity: IT systems support)
- TESCO STORES SR, a.s. (registered office: Cesta na Senec 2, 821 04, Bratislava, Slovakia; activity: IT systems support)
- Tesco PLC (registered office: Tesco Stores Ltd, Tesco House, Shire Park, Kestrel Way, Welwyn Garden City, AL7 1GA, United Kingdom; activity: IT systems support)
- Dunhum by Ireland Ltd. (registered office: Floor 3, Building 2, Harbour Square, Crofton Road, Dun Laoghaire, Co. Dublin, Ireland; activity: crediting of coupons and discounts)

No processors are engaged by **Raiffeisen Bank** in the processing.

Please be informed that within the organisations of the Controllers and the Processors, access to your personal data is only allowed on a "need-to-know" basis, to employees who are required to know such data for the performance of their job duties, and the same are obliged to respect the confidentiality of your personal data.

## 8.2. Other recipients

We may share your personal data with courts, public authorities and other administrative bodies where this is necessary to comply with our legal obligations. We may also share your personal data with law firms and other third party organisations if this is necessary to enforce or protect our rights and legitimate interests.

## 9. Rights of Data Subjects

Please note that you are entitled to the Data Subject rights under the GDPR, which are set out in the table below.

Data Subject right	Rights you are entitled to
<b>Right of access, right to information</b>	<p>You may request information on whether the Controllers process your personal data and, if so, you may request that the Controllers inform you regarding</p> <ul style="list-style-type: none"> <li>- for what purpose,</li> <li>- what kind of personal data,</li> <li>- on what legal basis and</li> <li>- to whom are transmitted, and</li> <li>- for how long the data are processed.</li> </ul>
<b>Right to rectification</b>	<p>You have the right to request the rectification of inaccurate personal data relating to you and, upon your request, the Controllers must rectify such inaccurate personal data without undue delay. The Controllers 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>
<b>Right to erasure ("right to be forgotten")</b>	<p>You have the right to request the deletion of your personal data, which the Controllers must comply with without undue delay.</p> <p>The Controllers are 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"> <li>- is required by an obligation under EU or Member State law (e.g. data processed under the Act on the Prevention of Money Laundering or the Act on Accounting);</li> <li>- is necessary for exercising the right of freedom of expression and information;</li> <li>- 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;</li> <li>- 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).</li> </ul> <p>In addition, the Controllers are also obliged to delete personal data concerning you without undue delay if the conditions detailed in Article 17 of the GDPR prevail.</p>

<p style="text-align: center;"><b>Right to restriction of processing</b></p>	<p>You have the right to ask the Controllers 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"> <li>- you dispute the accuracy of the personal data, in which case the restriction shall last until the Controllers are able to verify their accuracy;</li> <li>- the processing is unlawful and you oppose the erasure of the data and request the restriction of their use instead;</li> <li>- the Controllers no longer need the personal data for the purposes of the processing, but you need them for the establishment, exercise or defence of legal claims;</li> <li>- you object to the processing; in such case the restriction concerns the period until it is verified whether or not the legitimate grounds of the Controllers override those of yours.</li> </ul>
<p style="text-align: center;"><b>Right to data portability</b></p>	<p>You have the right to</p> <ul style="list-style-type: none"> <li>- request the personal data concerning you, which you have provided to the Controllers, to be released to you in a structured, commonly used and machine-readable format;</li> <li>- transfer these personal data to another controller without the Controllers having the right to obstruct this, provided that the processing is based on your consent or on a contract, and the processing is automated;</li> </ul> <p>have the personal data transmitted directly from one controller to another, where technically feasible.</p>

Please be further informed that you can find more details concerning the rights you are entitled to in Raiffeisen 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 Controllers' data protection officers and inform either of the Controllers of the problem related to the Controllers' data processing, as well as request information from them or ask for their opinion.

If you disagree with the opinion of the Controllers' data protection officers, 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>.

## 11. Further information

The Controllers shall have the right at any time to change the content of this Policy in their sole discretion, without giving any special notice. Such changes are not governed by the provisions of Chapter XIX of Raiffeisen Bank's [General Business Conditions](#).

For more detailed information on Raiffeisen Bank's data processing, 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 Raiffeisen Bank's [website](#), shall be governing.