

## Data Protection and Data Security Policy of Raiffeisen Bank Zrt. and its Subsidiaries

Effective as of: 28 November 2024

Raiffeisen Bank Zrt. and its subsidiaries (collectively, the "Bank" or "Banking Group") are committed to the protection of the personal data of their Customers and other data subjects, in the scope of which—in line with the <u>General Data Protection Regulation (GDPR)</u>—they pay special attention to the protection of the personal data of their Customers and other data subjects. In view of this, high-level data protection and data security measures have been introduced.

In accordance with the relevant laws, besides the protection of personal data the Bank ensures among others the protection of bank, securities, insurance, payment and business secrets, and any other secrets that are ordered by the law to be protected.

**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.).

## During the processing of personal data, the Bank always keeps in mind the basic principles of data processing, whereby it is ensured that

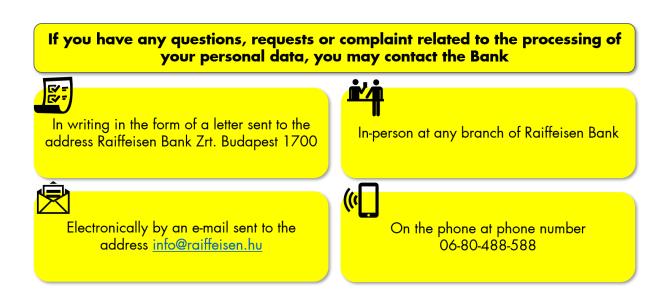
- personal data are processed lawfully and fairly, and transparently for the data subject;
- the data are collected only for specified, explicit and legitimate purposes;
- the collected data are adequate and limited to what is necessary in relation to the purpose of their collection;
- the data are accurate and, where necessary, kept up to date; in view of this, every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- the stored data enable the identification of the data subjects only as long as this is necessary to achieve the purpose of the processing of the personal data;
- appropriate security of the personal data is ensured, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures;
- the Bank is able to certify compliance with the above principles.



## The legal background of the processing of the data is constituted especially by the following laws:

- Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the "General Data Protection Regulation" or "GDPR");
- Act CXII of 2011 on Informational Self-Determination and Freedom of Information (the "Privacy Act");
- Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises (the "Banking Act");
- Act CXXXVIII of 2007 on Investment Firms and Commodity Dealers, and on the Regulations Governing Their Activities (the "**Investment Firms Act**");
- Act CXX of 2001 on the Capital Market (the "Capital Market Act");
  other Hungarian laws and binding legal acts of the European Union that concern the Bank's activity.

The **detailed rules and terms & conditions of the Bank's data processing** are included in the <u>General Business Conditions</u>, other rulebooks and terms of contract concerning the different business lines, and the privacy policies.



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) 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: <a href="http://birosag.hu/ugyfelkapcsolati-portal/illetekessegkereso">http://birosag.hu/ugyfelkapcsolati-portal/illetekessegkereso</a>.