

Privacy Policy for the Career Portal and job applications

Effective as of: 15 January 2025

1. General provisions

Dear Data Subject, please be informed that you can find detailed information on the processing of your personal data by Raiffeisen Bank Zrt. (the "Bank") as a controller in our [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 particular data processing.

1.1. Controller: Raiffeisen Bank Zrt. and its subsidiaries (collectively, the "Bank" or "Banking Group").

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.)

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 info@raiffeisen.hu



On the phone, at phone number 06-80-488-588

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

2. Processing purpose

In relation to the submitted job applications, the **Bank as a controller** collects and processes the personal data of natural person applicants—occasionally including special categories of personal data—in case the applicant contacts the Bank and submits a job application.

Each natural person who applies for an open job position advertised by the Bank shall be regarded as an applicant, irrespective of whether he/she is already employed by the Bank (an employee who applies for another position or wants to change his job within the Bank) or works for the Bank not in an employment relationship, but in another contractual arrangement similar to employment (e.g. in an agency relationship; collectively, the "**applicants**").

In order to support its recruitment and selection processes, advertise its open positions and ensure application to these and the use of the Bank's related services, the Bank operates a **Career Portal** online platform and database. The services of the Career Portal may only be used subject to registration, in the scope of which personal data are recorded and processed.

Registration is possible directly through the Career Portal, where the applicants provide their data directly to the Bank, and applicants may as well register using their Facebook, LinkedIn or Profession user profiles, through the social media platform of their choice. In case registration takes place through a social networking site, based on the applicant's consent the Bank may receive personal data concerning the applicant from the given social networking site; however, in the course of registration the applicants may enter in the Career Portal other data as well independently of the data provided for these sites. The applicants may apply for jobs advertised by the Bank through the Career Portal, in which case their data shall be processed as follows.

The purpose is primarily to search up and select potential employees with a view to providing for the necessary manpower, including

- evaluation of the job application (data processing related among others to the submission of the application, the selection process, the conduct of the recruitment procedure, and communication with the applicant),
- assessment of the professional qualifications and suitability of the selected applicants,
- checking compliance with the requirements of the position and the Bank's expectations connected to the job,
- assessment and evaluation of the (human) risks connected to the job application that the selected applicants may potentially entail, including examining whether or not the applicant meets the requirements and obligations entailed by the position applied for, as well as the Bank's general ethical and moral expectations on its employees and the Bank's values,
- checking the validity and authenticity of the identity documents submitted by the selected applicant in publicly available databases,
- in the case of a foreign applicant, checking the work permit submitted by the applicant at the competent authority,
- checking any jobs, other activities, positions and ownership interests that are incompatible with the applied-for job in publicly available databases.

Secondarily, the purpose is to rank the persons applying for the same position in an objective, impartial and non-discriminatory manner, and finally to notify them of the result of the application.

In the case of certain jobs, the Bank expects candidates applying for the given job successfully to present a certificate of good conduct, of which the data subject is informed in detail in the scope of the on-boarding process. Concerning those described in connection with human risks, and the fiduciary nature of the services provided by the Bank, the Bank checks whether its employees meet the requirements set out in the request for a certificate of good conduct, have no record of criminal offences, are not excluded from participation in public affairs, and are not excluded from employment or activities. The Bank as an employer wishes to call the attention of applicants to this expectation in the course of the application for the advertised job as well, i.e. in this Policy.

The Bank warrants that the personal data provided by the applicant or made available to or obtained in other ways by the Bank in the course of and in relation to the application procedure shall be processed by the Bank confidentially, in accordance with the data protection laws from time to time in effect and the laws governing for banking activities, as well as the provisions of the relevant

internal regulations of the Bank, and that the Bank shall protect these appropriately, taking all reasonable technical and organisational measures and having appropriate rules of procedure in place that are necessary for the enforcement of the relevant data protection and confidentiality rules.

All investigations, reviews and suitability tests conducted by the Bank are proportional to the significance of the risk entailed by the applied-for position, and the general and reasonable requirements and expectations the person filling the position is expected to meet, and are conducted with full respect for the candidate's privacy and personality rights, in each case within the framework set by the effective laws and the Bank's internal regulations.

The Bank endeavours to ensure that its staff selection process is as transparent for the applicants as possible, guaranteeing that they are able to exercise their related rights, including above all their personality and data protection rights, including the freedom of the applicant to make decision about the processing of his/her data in the course of the entire selection process.

The Bank reserves the right to close the evaluation process of job applications with the position remaining unfilled.

3. Legal basis of processing

The legal basis of the processing is the applicant's freely given and informed **consent** as per Art. 6 (1) a) of the GDPR.

If in connection with his/her application material the applicant provides special categories of personal data as well, the legal basis of the processing is the applicant's freely given, informed and **explicit consent** as per Art. 9 (2) a) of the GDPR. If in connection with his/her application material the applicant provides personal data relating to his/her disability, deterioration of health or health-related harm, the Bank shall process these data also in accordance with Art. 9 (2) a) of the GDPR, based on the applicant's **explicit consent**.

Please take note that you can **withdraw** your consent to the data processing at any time; this, however, will have no bearing on the lawfulness of any data processing executed under the consent prior to the withdrawal. After the withdrawal of consent, however, the Bank shall not have the right to process the applicant's data; it must be said that this at the same time makes it impossible to continue the application procedure in respect of the given applicant.

The legal basis for the verification of the authenticity of the data submitted by the applicant, comparison of the data with public databases, and any processing for the purposes of human risk assessment is the Bank's legitimate interest as per Art. 6 (1) f) of the GDPR.

4. The categories of processed data

- The applicant's identification data and the data of his/her identity documents (for example name, birth data, address, photo, etc.).
- Data concerning the qualifications and professional experiences of the applicant (for example certificates and diplomas testifying highest level of education, language proficiency certificates and certificates of special qualifications required to fill the job).
- Further data included in the applicant's CV (for example data concerning marital status, information concerning previous jobs and employers, facial image, contact information, the applicant's skills and hobbies, etc.).
- Data connected to the personal interview and the tests completed by the applicant.

- Where in his/her application material the applicant provides special categories of personal data as well, including data relating to his/her disability, deterioration of health or health-related harm, the processing shall also comprise these categories of data.

5. Retention of data

The applicant has an opportunity to request that the Bank processes his/her data in relation to the specific application only, in which case the data will be retained for 30 days after the closing of the application process.

The applicant may also request the Bank to process his/her data without any specific application, in which case the data will be retained for 1 year after the giving of the consent.

If the applicant withdraws his/her consent at any time, the data will be deleted within 30 days.

If the applicant withdraws his/her consent prior to the evaluation of the application, during the selection process—as a result of which the data will be deleted—the applicant will be regarded by the Bank to have withdrawn from the application.

6. Data processing

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

- Nexum Magyarország Kft. (registered office: 6726 Szeged, Temesvár körút 15., company registration number: 06-09-004861, tax number: 11398822-2-06)
- Captain Hungary Kft. (registered office: 2049 Diósd, Naphegy utca 7., company registration number: 13-09-082989, tax number: 11892326-2-13)

7. Rights of data subjects

Please note that you have the following Data Subject rights under the GDPR.

Data Subject right	Rights you are entitled to
Withdrawal of consent	You can amend or withdraw your consent at any time free of charge, without restrictions and without giving any reason. The withdrawal of your consent will not affect the lawfulness of any earlier data processing performed under such consent before the withdrawal.
Right of access, right to information	<p>You may request information on whether the Bank processes your personal data and, if so, you may request that the Bank inform you regarding</p> <ul style="list-style-type: none"> - for what purpose, - what kind of personal data, - on what legal basis and - to whom are transmitted, and - for how long the data are processed. <p>If you have not provided your personal data to the Bank, you may request information about the source of the data.</p>

Data Subject right	Rights you are entitled to
Right to rectification	<p>You have the right to request the rectification of inaccurate personal data relating to you and, upon your request, the Bank must rectify such inaccurate personal data without undue delay. The Bank 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>
Right to erasure ("right to be forgotten")	<p>You have the right to request the deletion of your personal data, which the Bank must comply with without undue delay.</p> <p>The Bank is 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"> - 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); - is necessary for exercising the right of freedom of expression and information; - 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; - 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). <p>In addition, the Bank is also obliged to delete personal data concerning you without undue delay if the conditions detailed in Article 17 of the GDPR are met.</p>
Right to restriction of processing	<p>You have the right to ask the Bank 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"> - you dispute the accuracy of the personal data, in which case the restriction shall last until the Bank is able to verify their accuracy; - the processing is unlawful and you oppose the erasure of the data and request the restriction of their use instead; - the Bank no longer needs the personal data for the purposes of the processing, but you need them for the establishment, exercise or defence of legal claims; - you object to the processing, in which case the restriction will apply until it is established whether or not the Bank's legitimate grounds prevail over your legitimate grounds.

Data Subject right	Rights you are entitled to
Right to data portability	<p>You have the right to</p> <ul style="list-style-type: none"> - request the personal data concerning you, which you have provided to the Bank, in a structured, commonly used and machine-readable format; - transfer these personal data to another controller without the Bank having the right to obstruct this, provided that the processing is based on your consent or on a contract, and the processing is automated; - have the personal data transmitted directly from one controller (such as the Bank) to another, where technically feasible.

Please be further informed that you can find more details concerning the rights you are entitled to in the Bank's [General Privacy Policy](#), in the chapter "Rights of the Data Subjects".

8. 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) 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/illetekesegekkereso>.

9. 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 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.

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. The version from time to time in effect is available in the Bank's Career Portal site.