

## Privacy Policy

### on the processing of data relating to contractual contact persons, representatives, and natural persons entering into a contractual relationship

Effective as of: 4 April 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 Corporate Lízing Zrt. (registered office: 1133 Budapest, Váci út 116-118.)
- Raiffeisen Investment Fund Management Zrt. (registered office: 1133 Budapest, Váci út 116-118.)

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



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

#### 2. General information about this processing

The purpose of this Privacy Policy is to provide information on the circumstances in which the personal data of the contact persons and representatives of legal persons who have a contractual relationship with the Bank (the "Partner") are processed. This policy also sets out in detail the conditions for the processing of the personal data of natural persons entering into a contractual relationship with the Bank.

This policy applies only to the processing of data in relation to contracts for the provision of non-banking services.

The way in which the information is communicated to the data subjects is defined in the contract between the parties or, in the case of non-concluded contracts, during the contractual negotiations.

### **3. Processing purpose**

- The purpose of the data processing is the full performance of the tasks related to the contract between the Bank and the Partner—including in particular the obligations arising from the services covered by the contract, the administration of the contract and the settlement of accounts between the parties—as well as communication related to the conclusion and performance of the contract and the fulfilment of the relevant notification obligations.
- In the case of natural persons, the purpose of the data processing is to establish the legal relationship between the parties in a contract, to ensure cooperation between the parties pursuant to Act V of 2013 on the Civil Code (the "Civil Code"), and to perform the service that is the subject of the contract.
- The purpose of data processing is the proper settlement of the legal claims arising from the contractual relationship.
- The purpose of the data processing is also to ensure compliance with the obligation set out in Article 169 (2)-(3) of Act C of 2000 on Accounting (the "Act on Accounting").

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

- The legal basis for the processing is the legitimate interest of the Bank in the full preparation, conclusion and proper performance of the contract, pursuant to Article 6 (1) (f) of the GDPR.
- In the case of natural persons, the legal basis for processing is the taking of steps at the request of the data subject prior to entering into the contract, and the performance of the contract pursuant to Article 6 (1) (b) of the GDPR.
- The legal basis for the processing is the legitimate interest of the Bank in the establishment, exercise and defence of its legal claims arising out of a contractual relationship, pursuant to Article 6 (1) (f) of the GDPR.
- Furthermore, the legal basis for the data processing is the fulfilment of the legal obligation of the Bank pursuant to Article 6 (1) (c) of the GDPR, as defined in Article 169 (2)-(3) of the Act on Accounting.

### **5. Data subjects**

- Contact persons: natural persons designated by the Partner as contact persons, who are not authorised to sign for the company.
- Representatives: the natural persons acting in the name of the Partner.
- Contracting parties: The natural persons entering into a contractual relationship with the Bank.

### **6. Source of the processed data**

The Bank collects personal data from the following sources: from the Partner and from the data subjects as defined in Section 4 of this Privacy Policy.

### **7. Categories of processed data**

Personal data necessary for identification (e.g. name, mother's name, place and date of birth), contact details, job title, job function, data necessary for issuing invoices (e.g. tax identification

number, bank account number), specimen signature, signature, personal data contained in documents that constitute accounting documents as per the Act on Accounting, and other personal data that may be associated with the data subject and that are generated in the context of the contractual service, and the conclusions that may be drawn from these.

## 8. Retention of data

- The Bank shall keep the contractual documents (and the personal data contained therein) until the termination of the contract.
- In the case of non-concluded contracts, personal data are processed for as long as a claim can be made in relation to the failure to conclude the contract, i.e. until the end of the general limitation period under the Civil Code, which is 5 years from the date of the failure to make the contract.
- After the termination of the contract, personal data will be processed until the expiry of the time limit for exhaustion of available remedies, where this is necessary to pursue a legal claim.
- The documents which are also considered accounting documents (and the personal data contained therein) are retained until the end of the 8 years' period from the termination of the contract, as defined in Section 169 of the Act on Accounting.

## 9. Recipients

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)
- Iron Mountain Magyarország Kft. (registered office: 1093 Budapest, Czuczor u. 10. 4. em.)

## 10. Rights of the data subjects

Please note that you have the following data subject rights under the GDPR.

Data subject right	Rights you are entitled to
<b>Right of access</b>	<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"> <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> <p>If you have not provided your personal data to the Bank, you may request information about the source of the data.</p>
<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 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</p>

Data subject right	Rights you are entitled to
<b>Right to erasure ("right to be forgotten")</b>	<p>the processing.</p> <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"> <li>- is mandatory 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 Bank is also obliged to delete personal data concerning you without undue delay if the conditions detailed in Article 17 of the GDPR prevail.</p>
<b>Right to restriction of processing</b>	<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"> <li>- you dispute the accuracy of the personal data, in which case the restriction shall last until the Bank is 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 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;</li> <li>- 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.</li> </ul>
<b>Right to data portability</b>	<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 Bank, in a structured, commonly used and machine-readable format;</li> <li>- 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;</li> <li>- have the personal data transmitted directly from one controller (such as the Bank) to another, where technically feasible.</li> </ul>

Data subject right	Rights you are entitled to
<b>Right to object</b>	You have the right to object at any time, on grounds relating to your particular situation, if you consider that the Bank is processing your personal data inappropriately for the purposes set out in this Privacy Policy. In such case, the Bank must demonstrate that the processing of the personal data is justified by compelling legitimate grounds which override the interests, rights and freedoms of the data subject or are related to the establishment, exercise or defence of legal claims.

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".

## 11. 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>.

## 12. 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.