

## **Privacy Policy** **for advertising, research and lead collection activities**

Effective as of: 13 June 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.)

#### **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](mailto:info@raiffeisen.hu)



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

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

### **2. Purpose and legal basis of the processing, Data Subjects, categories of processed data, data retention period**

#### **2.1 Advertising activity**

##### **2.1.1 Processing purpose**

From time to time the Bank appears in the market with new products and services, and in relation to the use of its products and services it regularly offers benefits in the scope of diverse promotions and the Loyalty Program. The Bank has a substantial business interest in contacting retail customers who have a business relationship with the Bank, corporate customers who are natural persons for data protection purposes, and potential customers who do not yet have a business relationship with the Bank (collectively, the "Data Subject") for the purpose of direct marketing, in relation to the products sold and services provided by the Bank.

Data Subjects can choose the channels through which they wish to be contacted for direct marketing purposes. The Bank may contact the Data Subjects through the following channels, provided that the Data Subject has given his/her consent: via direct mail, telephone, SMS messages, e-mail messages or other electronic channels (e.g. internet banking, mobile application, push notification).

### **2.1.2 Legal basis of the processing**

The legal basis for the processing, pursuant to Article 6(1)(a) of Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation or GDPR), is your consent.

Such consent may be amended or withdrawn at any time free of charge, without restrictions and without giving any reason. The withdrawal of consent will not affect the lawfulness of any earlier data processing performed under such consent before the withdrawal.

### **2.1.3 Data Subjects**

Retail customers who have a business relationship with the Bank, corporate customers who are natural persons for data protection purposes, and potential customers who do not yet have a business relationship with the Bank (see Section 2.1.1).

### **2.1.4 Categories of processed data**

Name, e-mail address, mailing address, phone number. The source of personal data: Data Subjects and third parties.

### **2.1.5 Retention period of the data**

Until withdrawal of the consent to the processing.

## **2.2 Research activities**

### **2.2.1 Processing purpose**

The Bank conducts market research and public opinion research (customer satisfaction surveys) as part of its research activities. The purpose of market research is to examine the consumer habits of the Bank's customers, which help the Bank to understand its customers' needs and expectations. The purpose of opinion poll research (customer satisfaction surveys) is to enable the Bank to assess how satisfied its customers are with the service or products provided by the Bank, so that the Bank can provide services of the best possible quality and a better customer experience to them.

The Bank contacts Data Subjects in the course of its research activities by sending online questionnaires or by telephone enquiries.

### **2.2.2 Legal basis of the processing**

The legal basis for processing is your consent pursuant to Article 6(1)(a) of the GDPR.

Such consent may be withdrawn at any time free of charge, without restrictions and without giving any reason. The withdrawal of consent will not affect the lawfulness of any earlier data processing performed under such consent before the withdrawal.

### **2.2.3 Data Subjects**

Retail customers who have a business relationship with the Bank, corporate customers who are natural persons for data protection purposes, potential customers who do not yet have a business relationship with the Bank, and the Bank's former Customers.

#### **2.2.4 Categories of processed data**

Name, e-mail address, mailing address, phone number. The source of personal data: Data Subjects and third parties.

#### **2.2.5 Retention period of the data**

The data are processed until withdrawal of the consent to the processing, but for 3 months from the termination of the business relationship at maximum.

### **2.3 Lead collection activity**

#### **2.3.1 Processing purpose**

The purpose of the processing is for the Bank to provide the Data Subject with satisfactory information about the product or service of the Data Subject's interest using the contact details provided by the Data Subject.

#### **2.3.2 Legal basis of the processing**

The legal basis for processing is your consent pursuant to Article 6(1)(a) of the GDPR.

Such consent may be withdrawn at any time free of charge, without restrictions and without giving any reason. The withdrawal of consent will not affect the lawfulness of any earlier data processing performed under such consent before the withdrawal.

#### **2.3.3 Data Subjects**

Retail customers who have a business relationship with the Bank, corporate customers who are natural persons for data protection purposes, and potential customers who do not yet have a business relationship with the Bank.

#### **2.3.4 Categories of processed data**

Name, e-mail address, mailing address, phone number. The source of personal data: Data Subjects and third parties.

#### **2.3.5 Retention period of the data**

The data are processed until withdrawal of the consent to the processing, but for 2 years from the giving of the consent at maximum.

### **3. Recipients**

#### **3.1 Processors**

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

##### **3.1.1 Advertising activity**

- LEAD Generation Kft. (registered office: 1036 Budapest, Lajos u. 48-66.);
  - Bang Bang Ideas Kft. (registered office: 2096 Üröm, Tücsök köz 1/c. 2. em. 11.);
  - Nitro Communications Kft. (registered office: 1036 Budapest, Lajos utca 66.).

### 3.1.2 Research activities

- Scale Research Piackutató és Tanácsadó Kft. (registered office: 1132 Budapest, Váci út 18.);
  - HuCall Hungarian Call Center Kft. (registered office: 1238 Budapest, Templom utca 67.);
- NRC Marketingkutató és Tanácsadó Kft. (registered office: 1034 Budapest, Kenyeres u. 28.).

### 3.1.3 Lead collection activity

- LEAD Generation Kft. (registered office: 1036 Budapest, Lajos u. 48-66.);
  - Bang Bang Ideas Kft. (registered office: 2096 Üröm, Tücsök köz 1/c. 2. em. 11.);
  - Nitro Communications Kft. (registered office: 1036 Budapest, Lajos utca 66.);
  - Neowell Kft. (registered office: 1139 Budapest, Forgách utca 9. B. ép.).

## 4. 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  |
|---|---|
| <b>Withdrawal of consent</b>                      | 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.   |
| <b>Right of access, right to information</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>                     | 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.  |
| <b>Right to erasure ("right to be forgotten")</b> | <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 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> </ul> |

| <b>Data Subject right</b>                 | <b>Rights you are entitled to</b>   |
|---|---|
|   | <ul style="list-style-type: none"> <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 are met.</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>  |

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".

## 5. 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>.

## **6. 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.