

## **Privacy Policy**

### **on the use of the GIRinfo Data Processing Service**

Effective as of: 06 August 2024

#### **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 kind of data processing.

**1.1. Controller: Raiffeisen Bank 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. The GIRinfo Data Processing Service**

The GIRinfo Data Processing Service (the "Service") is a service provided by GIRO Zrt. (registered office: 1054 Budapest, Vadász u. 31., the "Processor") with the purpose to enable data queries from certified public records.

The Service aims to

- reduce credit risks and the resulting losses,
- support quick lending decisions,
- help in the fight against money laundering,
- identify customers (natural and legal persons) reliably,
- verify the address and major documents of natural persons.

Through the Service, the Bank requests making queries of your personal data, as specified in Section 5 of this Policy, on the basis of which the Processor will perform an automated search in the certified public records, and transmit the result to the Bank.

For more information about the Service, please visit the website of [GIRO Zrt.](#)

### **3. Processing purpose**

The purpose of the data processing is customer due diligence in accordance with the provisions of Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (the "Money Laundering Act"), i.e. to reliably identify you. Customer due diligence is an obligation imposed on the Bank by the Money Laundering Act and is required, for example, when establishing a business relationship, when executing a transaction order exceeding a certain amount, but also when there is doubt about the authenticity, accuracy or adequacy of previously recorded customer identification data.

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

The legal basis for the processing of personal data in connection with the customer due diligence queries performed by the Bank is the fulfilment of the legal obligation as per Article 7 (3) and (8) (b) of the Money Laundering Act, in accordance with Article 6 (1) (c) of the GDPR.

### **5. Data Subjects**

The data subjects are those prospective customers of the Bank and those customers already having a contractual relationship with the Bank who use the Bank's services.

### **6. Categories of processed data**

Family name and given name; date and place of birth; nationality; type of identity document; number of identity document; expiry date of identity document; photograph; address card number; date of issue of address card; permanent address; temporary address.

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

The Bank shall retain the personal data processed—in accordance with Articles 56-59/A of the Money Laundering Act and Art. 169 of Act C of 2000 on Accounting—for 8 years from the termination of the customer relationship.

In the event that the conclusion of the contract fails, the Bank will retain the personal data processed for 5 years from the date of the failure.

### **8. Recipients**

#### **8.1 Processors**

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

- GIRO Zrt. (registered office: 1054 Budapest, Vadász u. 31.)

## 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 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 the processing.</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. 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>

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".

## 10. 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>.

## **11. 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 [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 the [Bank's website](#), shall be governing.