

Privacy Policy **on the use of a text recognition and analysis algorithm**

Effective as of: 17 June 2025

1. General provisions

Dear Data Subject, please be informed that you can find detailed information on the data processing of Raiffeisen Bank Zrt. in our [General Privacy Policy](#) available in the Bank's website; however, we think it is also important that we describe the distinguishing characteristics of this peculiar process in this policy in detail.

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



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

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

2. Purpose of the processing

The purpose of the processing is for the Bank to effectively monitor compliance with the rules of communication by evaluating as detailed below the telephone conversation between the data subject (the "Customer") and the Bank's employees, based on a text analysis of the conversation, as well as the communication to the Customer of the information specified in the legislation, the Bank's internal rules and other legal requirements, in order to improve the quality and accuracy of the service, and to ensure more effectively that the Customer has access to all the information specified in the legislation, the Bank's internal rules and other legal requirements during the conversation.

The Bank's data processing is also aimed at enhancing customer satisfaction and preventing complaints by using the most advanced solutions available in today's technology to ensure that its Customer facing employees comply as fully as possible with the law, internal regulations, other legal requirements and general communication standards in their dealings with Customers.

Using a copy of the recording of the conversation between the Customer and the employee, the Bank uses a text recognition algorithm (the "Application") to transcribe the recorded conversation according to predefined parameters (keywords, phrases), and analyses the same.

The Bank has specifically prepared the keyword database to filter out swear words, curses, Hungarian and generally used foreign language expressions, so that it can determine whether the information required by the legislation, internal rules and other legal regulations was delivered in a form of communication that is clear and understandable to the Customer and can be easily comprehended by him/her without any misunderstanding.

The Application recognises and marks the participants in the conversation, phases of simultaneous talking, waiting time and the place and time of music on hold in the flow of conversation, and marks the effective parts of the communication both in the audio recording and in the transcript.

The Application can identify the characteristic features of a conversation, including intonation, speech rate, volume, tone, articulation, silences, simultaneous talking, and variations in these parameters, based on a copy of the recorded audio file.

No Customer profiling is done during the use of the Application and the Customer is not subject to any detriment or negative legal consequences, nor is there any automated decision-making done entirely by a machine from start to finish. The Application is only meant to trigger human activity aimed at processing the text (transcription, text analysis according to different criteria), and the evaluation, the drawing of any conclusions, or the making of decisions is always done by a human.

3. Legal basis of the processing

The legal basis for processing is the legitimate interest of the Bank, pursuant to Article 6 (1) f) of the GDPR.

4. Data subjects

Customers who receive a call from the Bank's customer service or Collections Department, or who initiate a call to the Bank. The Bank collects the personal data directly from the data subject.

5. Categories of processed data

Customer name, call ID, call number, call direction, copy of original voice recording, identified keywords, text transcript of the call, IVR root data, speech characteristics.

6. Retention of data

The Bank will retain the personal data for 2 years from the date of their origination.

7. Data processing

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

- Xdroid Informatikai és Szolgáltató Kft. (registered office: 1031 Budapest Záhony u. 7.; tax number: 14213896-2-41; registration number: 01-09-172420)

8. 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
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>
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 prevail.</p>

Data Subject right	Rights you are entitled to
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.
Right to object	<p>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.</p>

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".

9. 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/illetekesselkereso>.

10. Further information

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. 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.