

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

Effective as of: 19 January 2023

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.; company registration number: 01-10-041042; tax number: 10198014-4-44; the "Bank").

1.2. Contact details of the Bank's data protection officers



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 or make a call to RB Szolgáltató Központ Kft. (registered office: 4400 Nyíregyháza, Órmester utca 4.; company registration number: 15-09-079787; tax number: 24096757-4-15; hereinafter "RBSC Contact Centre"), acting as a special services intermediary on behalf of the Bank, or the Bank's Collection Department. 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 60 days from the date of their origination.

7. Data processing

Please note that the Bank uses RBSC Contact Centre as a processor for the data processing.

8. Rights of data subjects

You shall have the right to request information through any of the above communication channels of the Bank at any time about the processing of your personal data, or access such data, and may furthermore request your personal data to be rectified, erased, or restricted, and you are also entitled to the right to object to the processing of your personal data. For more details concerning your rights, see the Bank's [General Privacy Policy](#), in the chapter "Rights of the data subjects".

Customers are reminded that they may object to the processing of their data by contacting the Bank through the communication channels provided in Section 1.2. If during the conversation the Customer objects to data processing, the call will be interrupted and the Customer redirected to another banking channel (e.g.: DirektNet, Myra application, bank branch, email, post office), where can continue the administration in full.

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. The lawsuit shall be adjudicated by the competent court having jurisdiction at the registered office of the defendant or, if you prefer, by the court having jurisdiction at your residential address or place of stay. 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>.

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](#).

If you need more 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 at 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.