

Privacy Policy for the Raiffeisen Loyalty Program

Effective as of: 4 May 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. 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 Investment Fund Management 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 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, and the data protection officer of the Subsidiaries is dr. Ildikó Dunár.

2. Purpose of the processing

The purpose of the processing is to enable the Bank to provide its customers (the "Customer") with various discounts in the course of the operation of the Raiffeisen Loyalty Program (the "Program") established by the Bank. Those Customers of Raiffeisen Bank are eligible to participate in the Program who meet the conditions set out in the General Terms and Conditions of the Raiffeisen Loyalty Program (the "Loyalty Program GTC"). The opportunity to participate in the Program is offered to Customers who are of legal age (the "Adult Participant") and minors over the age of 14 (the "Minor Participant") (collectively, the "Participant") in accordance with the rules set out in the Loyalty Program GTC.

About the participation and activation, the Bank will inform the Participant by e-mail or telephone, or via DirektNet or the MyRa application. For the registration, the Bank provides an interface that the Customers may access by clicking on the registration button in the websites <https://husegprogram.raiffeisen.hu/regisztraciokeres> or www.yelloklub.raiffeisen.hu. In the registration interface, the Participant can indicate his/her intention to join the Program by providing his/her e-mail address registered with the Bank (the "Registration"). A confirmation e-mail will be sent to the Participant's e-mail address for identification and activation. The information sent by e-mail does not require any further action or confirmation, and the Participant has become a member of the Program. With the Registration, the Participant consents to the processing of his/her personal data specified in Section 4 of this Policy, for the purpose of participating in the Program. The legal representative's authorisation required for a Minor Participant's consent is provided by the legal representative in the framework agreement for the provision of financial services concluded by the Minor Participant.

Participants may benefit from the discounts linked to the purchase of goods or the use of services and offered by one or more of the Bank's partners (the "Partner"), currently displayed in the [website of the Program](#).

The Participant may claim a discount in the case of in-store purchase by downloading the offer, printing the coupon and handing it over to the Partner, or showing the coupon from a mobile device, or showing his/her credit card, or in the case of online shopping by making the purchase in the online store. The Program will regularly send information about the Partners' currently available offers to the e-mail address provided by the Participant upon Registration.

3. Legal basis of the processing

Legal basis for the processing of data concerning an Adult Participant is the voluntary consent of the Adult Participant pursuant to Article 6(1)(a) of the GDPR.

Legal basis for the processing of data concerning a Minor Participant is the consent of the Minor Participant given with the permission of the legal representative pursuant to Article 6(1)(a) of the GDPR and Article 8(1) of the GDPR.

4. Categories of processed data

The Participant's family name and given name, gender, date of birth, e-mail address, and county of preference.

5. Retention of data

In the case of processing concerning the Participant, the Bank shall retain the data provided to it until the Participant's consent is withdrawn or for a maximum of 30 days after the Participant leaves the Program. The withdrawal of consent will not affect the lawfulness of any earlier data processing performed under such consent. The Participant is hereby informed that if he/she does not consent to the data processing or withdraws his/her consent, he/she will not be able to benefit from the services of the Raiffeisen Loyalty Program.

6. Involvement of data processors

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

- LEAD GENERATION Kft. (registered office: 1036 Budapest, Lajos utca 66.; company registration number: 01-09-911551; tax number: 14605842-2-41).

7. 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".

8. 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/illetekessegkereso>.

9. 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.