

**Privacy Policy**  
**for the myRaiffeisen mobile app**  
Effective as of: 7 October 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 particular 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



Írásban a Raiffeisen Bank Zrt. Budapest  
1700. címre küldött levél formájában



Személyesen bármelyik Raiffeisen  
bankfiókban



Elektronikus úton az [info@raiffeisen.hu](mailto:info@raiffeisen.hu)  
címmre küldött e-mailben



Telefonon a 06-80-488-588-as  
telefonszámon

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

## 2. The purpose and legal basis of processing, categories of processed data, retention period

### 2.1. Sales.UP

#### 2.1.1. Processing purpose

- a) In the Sales.UP application (hereinafter "Sales.UP") linked to the myRaiffeisen mobile application (the "Mobile App"), successful transactions and card blocks are stored with a view to the provision of the Transaction History service, and the same data are analysed by Sales.UP in order to provide the Analytics service. Such processing is necessary to enable the Bank to provide the Mobile App as a contractual service to the Customer in accordance with the contract concluded with the Customer.
- b) Sales.UP profiles the Customers who use the Mobile App and who have consented to the processing of the data concerned, according to certain parameters. Profiling is done on the basis of parameters that determine the Customer's purchasing habits and circumstances, such as the Customer's internal bank identifiers and certain specific elements of their transaction history, the location and amount of the purchase, the type/identity of the seller.

On the basis of the data thus determined and used, Sales.UP creates a customer profile (the "Customer Profile") of the Customers concerned, enabling the Bank to conclude what financial needs the Customers concerned have/may have, which banking services may be the most suitable to meet their needs.

The purpose of the use and processing of the personal data forming the basis of the Customer Profile is to enable the Bank to provide the Customer concerned with preferential offers and personalised advertising based on the conclusions drawn from the Customer Profile.

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

The legal basis for the processing under Section 2.1.1. a) is the performance of the contract between the Bank and the Customer concerned pursuant to Article 6(1)(b) of Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation or GDPR).

The legal basis for processing pursuant to Section 2.1.1. b) is the consent of the Customer concerned 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.

### **2.1.3. Data subjects**

Persons using the Mobile App.

### **2.1.4. Retention of data**

The Bank shall retain the personal data processed in accordance with Section 2.1.1. a)—in accordance with Articles 56-59/A of Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (the "Money Laundering Act"), and Article 169 of Act C of 2000 on Accounting (the "Accounting Act")—for 8 years from the termination of the customer relationship.

The Bank shall retain the personal data processed in accordance with Section 2.1.1. b) until consent is withdrawn, but for no longer—in accordance with Articles 56-59/A of the Money Laundering Act and Article 169 of the Accounting Act—than 8 years from the termination of the customer relationship.

### **2.1.5. Categories of processed data**

The Customer's date of birth, gender, the Customer's account numbers, card types, account opening date, bank account transaction history, CRM communication target group and personalisation data.

### **2.1.6. Recipients**

#### **2.1.6.1. Processors**

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

- Raiffeisen Bank International AG (registered office: Am Stadtpark 9, 1030 Vienna, Austria)
- Amazon Web Services Inc. (registered office: 410 Terry Avenue North, Seattle, WA 98109-5210)
- Finshape Hungary Kft. (registered office: 1027 Budapest, Ganz utca 16.)

### **2.1.7. Profiling**

In the course of data processing pursuant to Section 2.1.1 b), the Bank profiles the Customers who have consented thereto. Pursuant to Article 21(2) of the GDPR, the data subject may object to processing based on profiling serving direct marketing purposes and withdraw his or her previously given consent to the processing in relation to the processing in question, by contacting the Bank using one of the contact details specified in Section 1.2 or in the Mobile App under the menu My user account/Privacy and security/Consents.

## **2.2. Carbon footprint statement**

### **2.2.1. Processing purpose**

The Sales.UP app linked to the Mobile App analyses the shopping habits of Customer who has consented to the processing of data concerned under the Transaction History service by classifying each transaction into appropriate categories (e.g. food, housing, bills, utility charges, etc.). As a basis for the analysis, the Bank first defines a carbon dioxide equivalent index ("CO<sub>2</sub>e") for each category of banking transactions generated by the industry concerned, which may be considered as a measure of the carbon footprint. This index calculates the greenhouse gases that pollute the environment, such as carbon dioxide, methane, nitrous oxide and fluorinated gases. In the analysis, the Bank assigns the CO<sub>2</sub>e level corresponding to the relevant category to the transaction carried out by the Customer and classified in the appropriate category.

Based on the sum of the CO<sub>2</sub>e levels determined by the analysis for each transaction carried out, the Mobile App creates a monthly profile of the Customer, which allows the Customer to know the estimated approximate carbon footprint created as a result of his/her purchase behaviour (the "Carbon Footprint Statement").

The Mobile App will display the Carbon Footprint Statement to the Customer only if the Customer has made transactions totalling at least HUF 20,000 in the given month, and a sufficient number of transactions in the relevant categories (e.g. food, housing, bills, utility charges, etc.).

The purpose of the processing of data related to the Carbon Footprint Statement is to enable the Bank to inform the Customer, through the Mobile App, of the extent of his/her Carbon Footprint in relation to his/her purchasing habits.

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

The legal basis for processing is the consent of the Customer concerned, 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**

Persons using the Mobile App.

### **2.2.4. Retention of data**

The Bank will retain the personal data until consent is withdrawn, but not longer than the end of the second year counted from the year of origination of the data.

### **2.2.5. Categories of processed data**

The Customer's account numbers, card types, account opening date, bank account transaction history.

### **2.2.6. Recipients**

#### **2.2.6.1. Processors**

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

- Raiffeisen Bank International AG (registered office: Am Stadtpark 9, 1030 Vienna, Austria)

- Amazon Web Services Inc. (registered office: 410 Terry Avenue North, Seattle, WA 98109-5210)
- Finshape Hungary Kft. (registered office: 1027 Budapest, Ganz utca 16.)

### **2.2.7. Profiling**

The Bank shall create a profile of the Customer for the purposes and in the manner set out in Section 2.2.1. In particular, the Customer has the right to object to data processing based on profiling, which means that the Customer may object to the processing of data in connection with the Carbon Footprint Statement. The Customer may exercise his/her right to object to the processing through the Bank's communication channels specified in Section 1.2.

## **2.3. Count.ly**

### **2.3.1. Processing purpose**

The Countly application running on the Mobile App (hereinafter "Countly") uses the customers' internal bank identifiers to generate reports and collect information for problem and error management and application development purposes. Through Countly, the Bank also keeps track of whether or not each message or offer sent by the Bank has been opened by the Customer.

### **2.3.2. 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.

### **2.3.3. Data subjects**

Persons using the Mobile App.

### **2.3.4. Retention of data**

The Bank will retain the personal data for 1 year from the date of their origination.

### **2.3.5. Categories of processed data**

The Customer's bank ID, ID assigned to the Mobile App, customer segment, the customer's role (e.g. account holder, authorised representative, etc.), customer activity within the Mobile App.

### **2.3.6. Recipients**

#### **2.3.6.1. Processors**

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

- Raiffeisen Bank International AG (registered office: Am Stadtpark 9, 1030 Vienna, Austria)
- Countly Ltd. (registered office: 9th Floor 107 Cheapside EC2V 6DN, London, UK)

## **2.4. Fraud Monitoring system**

### **2.4.1. Processing purpose**

In order to protect Customers against fraud, a fraud prevention system (the "Fraud Monitoring system") is in place at the Bank to detect and prevent unauthorised or fraudulent payment transactions and to detect applications and related actions that may put the funds in the Customer's account at risk.

The Fraud Monitoring system is based on the analysis of payment transactions, taking into account elements that are specific to the payment service user under the circumstances of normal use of personal identification data.

In order to achieve the above objective, the Bank uses the Fraud Monitoring system to detect and filter malicious activities carried out with the Customer's mobile device, which requires the processing of the Customer's personal data as defined in Section 2.3.5. During the operation of the Fraud Monitoring system, data concerning the usage log of the Customers' device using the Mobile App and the non-standard usage of the mobile devices are examined.

### **2.4.2. 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.

### **2.4.3. Data subjects**

Persons using the Mobile App.

### **2.4.4. Retention of data**

The Bank will retain the personal data for 1 year from the date of their origination.

### **2.4.5. Categories of processed data**

Client activities within the Mobile App, list of applications installed on the used mobile device at the time the Mobile App is used.

### **2.4.6. Recipients**

#### **2.4.6.1. Processors**

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

- Raiffeisen Bank International AG (registered office: Am Stadtpark 9, 1030 Vienna, Austria)
- Feedzai – Consultoria e Inovação Tecnológica, S.A. (registered office: Rua Pedro Nunes, IPN – Edif. Instituto Pedro Nunes, 3030-199 Coimbra, Portugal)

## **2.5. Adjust**

### **2.5.1. Processing purpose**

The Adjust application running in the Mobile App ("Adjust") uses the identifier of the device of the Customer using the Mobile App (the "Device ID") to generate reports and collect information to analyse user behaviour so that the Bank can improve the user experience and display targeted, personalised content through advertising systems. By user behaviour, the activities carried on within the app by the customer using the Mobile App, what button, box, etc. he or she clicks on, is meant.

### 2.5.2. Legal basis of the processing

The legal basis for processing is the consent of the data subject (Customer) 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.

### 2.5.3. Data subjects

Persons using the Mobile App.

### 2.5.4. Retention of data

The Bank shall retain the personal data for 25 months from their origination, but no later than until the withdrawal of consent.

### 2.5.5. Categories of processed data

Device ID, Customer activities within the Mobile App.

### 2.5.6. Recipients

#### 2.5.6.1. Processors

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

- Raiffeisen Bank International AG (registered office: Am Stadtpark 9, 1030 Vienna, Austria)
- Adjust GmbH (registered office: Saarbrücker Str. 37a 10405 Berlin, Germany)

## 3. 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>	<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 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> <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 prevail.</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>



<b>Right to object</b>	<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>
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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".

#### 4. 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>.

#### 5. 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 <https://www.raiffeisen.hu/web/english> under the heading [Data Processing and Privacy Policy](#), 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.