

## Privacy Policy for the myRaiffeisen mobile app

Effective as of: 17 November 2021

### 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.)
- RB Service Centre Kft. (registered office: 4400 Nyíregyháza, Sóstói út 31/b)
- 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.)
- Raiffeisen Biztosításközvetítő Kft. (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](mailto: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. The purpose and legal basis of processing, categories of processed data, retention period

These details of the processing are included the Bank's [Privacy Policy for the Provision of Payment Services](#), which you can find among the privacy policies available in the [Bank's website](#) under the heading [Data Processing](#).

Please be informed that according to its General Business Conditions in the case of the function "Currency exchange at spot/special exchange rate" the Bank offers special buying rates to its Customers—using automated decision-making, adjusting the rate with a premium determined on the basis of the domestic foreign exchange demand, market behaviour, and other internal analyses—in its electronic channels, in case the Customer clicks on this function in one of the Bank's online platforms. With the acceptance of the offer, an agreement is created between the Bank and the Customer for the currency exchange at the accepted exchange rate, determined using automated decision-making. When the Customer uses this function for the first time, the Bank displays an information message for the Customer, which the Customer is required to accept to be able to use the function and conclude an agreement. The system files connected to the acceptance are handled by the Bank within a closed system.

### 3. Data processing

Entities entitled to access the data are Raiffeisen Bank International AG (RBI) as a data processor and the Bank's outsourcing partner and parent bank (registered office: Am Stadtpark 9, 1030 Vienna, Austria), and its sub-processors Amazon Web Services Inc. (AWS) (registered office: 410 Terry Avenue North, Seattle, WA 98109-5210), International Business Machines (IBM) (registered office: 1 New Orchard Road Armonk, New York 10504-1722 United States US: 914-499-1900), and Countly Ltd. (registered office: 9th Floor 107 Cheapside EC2V 6DN London United Kingdom, VAT number: GB168599344).

The services are used in the territory of the EEA, there is no data transmission to third countries.

Purpose of the data transmission	Legal basis for the transmission	Data categories affected by the transmission	Recipient
<p>RBI, and as sub-processors Amazon and IBM: a) successful transactions and card blockages are stored in a cloud, and the processors analyse these in the scope of the Zoom service</p> <p>b) in connection with the execution of each of the above types of data processing, certain data processing operations are done with the cooperation of the processors</p>	<p>Performance of the data processing contract between RBI and Raiffeisen Bank Zrt. and the contracts between RBI and the sub-processors (AWS and IBM), as well as performance of the customer's contract, and the Bank's legitimate interest.</p>	<p>Storage of the data of successful card transactions and card blockages and all the above processing operations are implemented with technical solutions that ensure that the data become accessible for the processors, but are not stored, and are transmitted only temporarily, with a view to the execution of the transactions</p>	<p>Raiffeisen Bank International AG (RBI)</p> <p>Amazon Web Services EMEA SARRL (AWS)</p> <p>International Business Machines (IBM)</p>
<p>Within the application, RBI and its sub-processor Countly Ltd.—using the customers' internal ID-s at the Bank—prepare reports and collect information for the purposes of complaint handling, problem and error management, and application development. Besides, the Bank monitors whether the customer has opened the different messages and offers sent by the Bank or not.</p>	<p>Performance of the data processing contract between RBI and Raiffeisen Bank Zrt. and the contracts between RBI and the sub-processors, as well as performance of the customer's contract, in the case of complaint handling the performance of legal obligation, and the Bank's legitimate interest</p>	<p>Data of the operations executed in the application, data of the customer's device, possibly location data, and technical parameters.</p>	<p>Raiffeisen Bank International AG (RBI)</p> <p>Countly Ltd.</p>

### 4. 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".

### 5. 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. 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/illetekesselkereso>.

## **6. 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](http://www.raiffeisen.hu) under the heading [Data Processing](#), the [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.