

Privacy Policy for the myRaiffeisen mobile app

Effective as of: 11 April 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 Leasing Ltd. (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. 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](#).

2.1. Sales.UP

2.1.1. Purpose of the processing

- 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 the 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.

2.1.3. Data subjects

The data subjects are the Customers who have a contractual relationship with the Bank and use the Mobile App.

2.1.4. Duration of the processing

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**, otherwise—in accordance with Articles 56-59/A of the Money Laundering Act and Article 169 of the Accounting Act—for **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. Data processing

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., company registration number: 01-09-197531, tax number: 25062230-2-41)

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.

Countly

2.1.8. Purpose of the processing

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.

2.1.9. 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.

2.1.10. Data subjects

Customers who have a contractual relationship with the Bank and who are entitled to use the Mobile App on the basis of their contractual relationship and have completed the registration required for use of the Mobile App.

2.1.11. Duration of the processing

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

2.1.12. 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.

2.1.13. Data processing

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, tax number: GB168599344)

3. 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".

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) 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>.

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](#).

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.