

Annex No. 2 – Retention periods

service type	legal background of service	mandatory retention period
core banking activities	Hpt.: Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises	8 years from cessation of contract (having regard to the Pmt. + Szv. tv.)
financial services provided through the internet	MNB recommendation: MNB recommendation No. 15/2015	messages and data concerning electronic transaction for 8 years according to the Pmt. + Szv. tv., and for at least 5 years according to the MNB recommendation
insurance intermediary activity	Bit.: Act LXXXVIII of 2014 on Insurance Activity	as an insurance intermediary, the Bank is a processor, and has access to the data in this capacity 1. 8 years from the expiry or cessation of the insurance policy or contract 2. 8 years from the closure of the loss: customer data related to personal injuries 3. 8 years from the closure of the litigation 4. images made with imaging diagnostic procedures, data of the consultation of records kept for the purposes of scientific research: 10 years 5. health care documentation, findings made on the basis of images made with imaging diagnostic procedures: 30 years 6. final reports, information from the National Registry of Congenital Anomalies, the National Registry of Cardiac Infarctions, or the Central Implant Register: 50 years
	KGFB tv.: Act LXII of 2009 on Vehicle Liability Insurance	
complaint management	Art. 288 of Hpt., Art. 159 of Bit.	5 years
unrealised contracts (service demand based on the Hpt.)	Ptk.: Art. 6:22 of Act V of 2013 on the Civil Code of Hungary Art. 166/A of Hpt. Infotv.: Art. 6 (1) of Act CXII of 2011 on Informational Self-Determination and Freedom of Information	5 years the general limitation period defined in the Ptk. is governing
customer due diligence measures	Pmt.: Art. 56-59 of Act CXXXVI of 2007 on the Prevention and Impeding of Money Laundering and Terrorist Financing	1. in the case of transaction orders: 8 years from transaction 2. in the case of business relationship: 8 years from the cessation of the contractual relationship

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identification of US relation	FATCA tv.: Act XIX of 2014 on the Improvement of International Tax Compliance between Hungary and the United States of America	1. in the case of transaction orders: 8 years from transaction 2. in the case of business relationship: 8 years from the cessation of the contractual relationship
accounting certificates related to services	Szám. tv.: Art. 169 of Act C of 2000 on Accounting	8 years from the issue of the accounting certificate
certificate for tax payment related to service	Art.: Art. 202-205 of Act CL of 2017 on the Rules of Taxation	limitation period of the right to determine the amount of payable tax is 5 years
payment services	Pft.: Act LXXXV of 2009 on the Pursuit of the Business of Payment Services	8 years from cessation of contract (Pmt.)
investments	Bszt.: Act CXXXVIII of 2007 on Investment Firms and Commodity Dealers, and on the Regulations Governing Their Activities	8 years from cessation of contract (Pmt.)
capital market transactions	Tpt.: Act CXX of 2001 on the Capital Market	8 years from cessation of contract (Pmt.)
debt management	in the absence of any concrete law relevant to the industry, Infotv.: Art. 6 (1) of Act CXII of 2011 on Informational Self-Determination and Freedom of Information based on services provided under the Hpt. + Bit.	8 years from the latest of the cessation of the contract or the debt (Pmt.)
marketing a) direct marketing	Grt.: Art. 6 of Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities	1. no statutory obligation for retention period, therefore no time limit as long as the consent is maintained 2. however, upon the cancellation of the consent the record must be immediately deleted from the list
b) research and direct marketing	Kkt.: Act CXIX of 1995 on the Processing of Name and Address Information Serving the Purposes of Research and Direct Marketing	1. no statutory obligation for retention period, therefore no time limit until the objection of the data subject 2. in the case of objection, deletion immediately after the fact becomes known 3. in the case of data transmission, the register on deliveries and receipts must be retained until the end of the 5th year following the transmission

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	<p>Nytv.: Act LXVI of 1992 on Keeping Record on the Personal Data and Addresses of Citizens</p>	<p>1. no statutory obligation for retention period, therefore no time limit until the objection 2. in the case of objection, deletion immediately after the fact becomes known</p>
d) e-commerce services	<p>Ekertv.: Act CVIII of 2001 on Certain Issues of E-Commerce Activities and Information Society Services</p>	<p>1. for the fulfilment of e-services: a) if the contract fails to realise, 5 years due to legitimate interest (Ptk.) b) immediately upon cessation of contract and the last invoice 2. in the case of contact due to the increase of efficiency, or market research: a) immediately after cessation of the purpose of processing b) in the case of the data subject's objection, immediately after the declaration of objection becomes known</p>
security services	<p>Szvtv.: Act CXXXIII of 2005 on the Rules for the Protection of People and Property and Private Investigation Activities</p> <p>Vhr.: Ministry of Interior Decree 22/2006 (IV.25.) on the implementation of Act CXXXIII of 2005</p>	<p>unless used, camera recordings shall be retained for no longer than the following term from the recording date: 60 days (regulations for financial institutions, Art. 31 (4))</p>
legal representation, processing for lawyers and attorneys	<p>Ütv.: Art. 53 of Act LXXVIII of 2017 on Attorneys-at-Law.</p> <p>Btk.: Act C of 2012 on the Criminal Code</p> <p>Pmt. Chamber regulations</p>	<p>1. 10 years after the cessation of legal representation 2. 10 years after the final closure of lawsuit or out-of-court proceedings</p>