

Privacy Policy

concerning advertising, lead collection and customer relationship management activities

Effective as of: 08 February 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.)
- 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



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. Processing purpose

It is an essential business interest of the Bank to communicate with the customers (both retail and corporate) that are already in a business relationship with the Bank in respect of the products and services sold or provided by the Bank, as well as with potential customers (both retail and corporate) who do not have a business relationship with the Bank yet, for the purpose of future cooperation and contracting, or after contact has been established successfully, to make offers to these persons for the Bank's services/products, in the range necessary to achieve the Bank's purposes.

From time to time the Bank appears in the market with new products and services, and in relation to the use of its products and services it regularly offers benefits in the scope of diverse promotions. It wishes to regularly inform its customers and prospective customers of its products and promotions, as well as the available benefits through direct mails, offers and newsletters concerning such matters.

Using the data processed by it—by means of the grouping of customers, profiling, and mathematical analyses—the Bank sends personalised offers, benefits and advertisements to customers and prospective customers who have consented to this. Using the customer data available to it—the types of which data are

included in the General Privacy Policy—the Bank arranges the data into groups according to various criteria, elaborates models, and applying these draws conclusions about which products and offers might be most useful for existing and prospective customers. This activity entails the analysis of the data available to the members of the Raiffeisen Banking Group, and seeking correlations among these.

The purpose of this activity is to enable the Bank to send such offers to its customers as will likely interest them, avoiding a situation where customers receive uninteresting offers. In the scope of this the customers may also determine in which channel they prefer to be contacted. This advertising arrangement does not narrow down the range of the Bank's available products and services, it is only an attempt to reduce the number of direct marketing contacts.

In newsletters—depending on their type—a subscribing customer or prospective customer receives information at regular intervals (e.g. daily, weekly or monthly) on the new services, products and promotions of the Bank and on other useful matters.

In order to establish contact, the Bank is allowed to use, subject to the data subject's consent—for the purposes of making contact via direct mail, on the phone, in SMS, by e-mail, via internet banking, on mobile application or other e-channel—any contact data provided by the customer or prospective customer, unless the customer or prospective customer has prohibited the use of specific (or all these) channels.

The primary purpose of the processing is to send newsletters, advertisements, offers and other communication to the customers and prospective customers, and in the scope of this to inform customers and prospective customers of the Bank's new products and services, and any benefits that may be used in respect of these, and thereby to acquire (new) active customers for the Bank.

Further purposes of the processing are to

- a) carry out market research and customer satisfaction surveys, the purpose of which is to enable the Bank to assess how satisfied its customers are with the service provided to them, and by means of this to provide the best service possible to them;
- b) manage the customer relationship;
- c) ensure high-quality and efficient customer service;
- d) maintain contact,
- e) as well as—where this is necessary according to the relevant laws, in that case under the express prior consent of the customer or prospective customer (so-called opt-in system)—to give business offers, communicate advertisements, send newsletters.

The Bank processes the personal data provided to the Bank by the customers, prospective customers and third parties.

You can also provide your personal data in the Bank's website, through so-called Lead Collection Forms, to express your request information about specific products and services of the Bank and to receive advertisements targeting those.

The Bank shall have the right to take over customer data from external sources or third party data controllers for the purposes of advertising.

In the case of any use for advertising purposes, the Bank shall ensure the opportunity for the customer or prospective customer to prohibit any use of his or her data for such purposes or to change or cancel his or her previous consent at any time free of charge, without restrictions and without any reason given.

The Bank shall have the right to use the data of a non-natural person customer or prospective customer for such purposes until this is expressly prohibited (so-called opt-out system).

The Bank shall have the right to transmit the data of the customer or prospective customer to other members of the Banking Group for the purpose of processing related to advertising.

3. Legal basis of processing

The legal basis of processing for the purposes described in detail in Section 2 is the data subject's freely given and informed consent as per Art. 6 (1) a) of the GDPR. In the case of any use for advertising purposes, the Bank shall ensure the opportunity for the customer or prospective customer to change or cancel his or her consent at any time free of charge, without restrictions and without any reason given.

4. The categories of processed data

- Identification and contact data, e.g. your name, e-mail address, telephone number, date of birth.
- Data necessary for the use of the services (e.g. information on your income and wealth, marital status, etc.).
- Data related to the products and services you have used previously from the Bank, members of the Banking Group, or the Bank's business partners or other persons or entities that are in a contractual relationship with the Bank.
- Additionally, the Bank may as well request you to provide other data relevant to the given product, e.g. personal data, data concerning employment relationship, household data, and data concerning banking relations and the product. These all serve to prepare the potential conclusion of the agreement and aim to simplify later processes, make them more convenient and customer-friendly for you, or to enable the Bank to provide more exact information related to the use of the product (e.g. preliminary filtering in the case of a loan).

5. Retention period of the of data:

In the case of any processing based on consent, the Bank shall retain the provided data until the withdrawal of your consent, but maximum until the end of the general prescription period as per the Civil Code, i.e. for 5 years.

Customers and prospective customers are entirely free to decide whether or not to give their consent to receiving advertising messages, therefore you may at any time change or withdraw your consent without limitation or without any reason given, free of charge.

The withdrawal of consent will not affect the lawfulness of any earlier data processing performed under such consent.

6. Data processing

The Bank has the right to engage processors for data processing. For detailed information on processors, see the [List of Data Processors](#) and [Annex No. 2 to the General Business Conditions \(Outsource List\)](#).

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 [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.