

Privacy Policy

regarding the handling of matters related to deceased customers


Effective as of: 01/06/2026

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 kind of 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

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 e-mail sent to info@raiffeisen.hu	On the phone, at phone number 06-80-488-588

The data protection officer of the Bank is dr. Ildikó Dunár.

2. General information about this processing

The purpose of this privacy policy is to provide information regarding the Bank's data processing activities in connection with the administration of matters involving the Bank's deceased customers. It is in the Bank's fundamental interest to be reliably informed of the death of its deceased customers, as this enables the Bank to update customer data and fulfil its legal and financial obligations related to the death.

The following are regarded as immediate family members: a spouse, any direct line relative, an adopted, step or foster child, an adoptive, step or foster parent, or a sibling, or a partner.

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

Processing purpose	Legal basis of the processing	Categories of processed data	Retention period
<p>Data processing related to the person reporting the death of a deceased customer</p> <p>The purpose of the data processing is to identify the person reporting the death of a deceased customer and to facilitate communication between the Bank and the reporting party, as well as to use the contact information provided to obtain documents certifying the fact of death.</p>	<p>The legal basis for data processing is the Bank's legitimate interest in obtaining reliable information regarding the deceased person and in performing the related administrative tasks, pursuant to Article 6(1)(f) of Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation, GDPR).</p>	<p>The data processed in connection with the report includes the reporting person's name, phone number, e-mail address, and home address. Source of the personal data is the Data Subject.</p>	<p>Retention period for the reporting person's data: the date of receipt of the grant of probate.</p>
<p>Data processing related to loans taken out and not repaid by the deceased customer and to leases that have not yet expired pursuant to Section 164 (y) of Act CCXXXVII of 2013 (the "Banking Act").</p> <p>In order to disclose such data, which are considered bank secrets, it is necessary to identify the immediate family member and verify his/her status as an immediate family member.</p>	<p>The legal basis for the data processing is the disclosure of data and information classified as banking secrets as specified in Section 164 (y) of the Banking Act at the request of an immediate family member pursuant to Article 6(1)(f) of the GDPR, and thus the Bank's legitimate interest in fulfilling the immediate family member's request.</p>	<p>Data required to identify the immediate family member are: name, birth name, place and date of birth, mother's name, type and number of identification document.</p> <p>Data for communication with the immediate family member are: address, phone number.</p> <p>Presentation of documents proving immediate family member status (e.g. identity document, marriage certificate).</p>	<p>Retention period for the reporting person's data: the date of receipt of the grant of probate.</p>
<p>Data processing regarding death beneficiaries</p> <p>A customer may give instructions for the event of his/her death regarding the disposition of specified accounts and their exclusion from the probate proceedings, and the Bank must comply with such instructions.</p>	<p>The legal basis for data processing is the data subject's legitimate interest, pursuant to Article 6(1)(f) of the GDPR, in designating a successor to his/her specific accounts for the event of his/her death, as well as the Bank's legitimate interest in fulfilling the data subject's designation of a beneficiary for the event of his/her death.</p>	<p>Identification and contact data of the death beneficiary</p>	<p>Until the execution of the testamentary disposition; the documents certifying the execution of the disposition shall be retained until the expiration of the general limitation period (5 years) specified in the Civil Code, calculated from the date of execution of the disposition.</p> <p>For the accounting documents evidencing payment, 8 years pursuant to Section 169 (2) of Act C of 2000 on Accounting.</p>

The following are regarded as immediate family members: a spouse, any direct line relative, an adopted, step or foster child, an adoptive, step or foster parent, or a sibling, or a partner.

Processing purpose	Legal basis of the processing	Categories of processed data	Retention period
Data processing related to the payment of the inherited assets to the heir of the deceased customer.	The legal basis for data processing, pursuant to Article 6(1)(f) of the GDPR, is the Bank's legitimate interest in ensuring that the accounts opened by its deceased customer during his or her lifetime are closed as soon as possible. or Compliance with a legal obligation (Article 6(1)(c) of GDPR). Documents as per Act C of 2000 (the Act on Accounting).	Identification and contact data of the data subjects	Until payment of the asset; the documents certifying the execution of the disposition shall be retained until the expiration of the general limitation period (5 years) specified in the Civil Code, calculated from the date of execution of the disposition. For the accounting documents evidencing payment, 8 years pursuant to Section 169 (2) of Act C of 2000 on Accounting.
Enforcement of the Bank's claim against the heir(s) during the probate proceedings regarding any loan debt	The legal basis for data processing is the Bank's legitimate interest in enforcing its contractual claims pursuant to Article 6(1)(f) of the GDPR.	Identification and contact data of the data subjects, as well as the information necessary to enforce the claim.	The general limitation period defined in the Civil Code (5 years)
Data processing regarding the deceased customer's payment protection insurance, and data transfer to the Insurer In the case of credit and loan transactions combined with payment protection insurance, the Bank as the Beneficiary must attempt to draw down the coverage amount within the claim period and, for this purpose, provide the insurer with the information necessary to identify and contact the heirs/immediate family members.	The legal basis for data processing is the Bank's legitimate interest in enforcing its contractual claims pursuant to Article 6(1)(f) of the GDPR.	Information necessary to identify the heirs or immediate family members and to contact them.	Until the purpose of the data processing ceases to exist, but no later than the expiration of the limitation period for claims arising from or related to the group insurance contract following the termination of the payment protection insurance relationship. For the accounting documents evidencing payment, 8 years pursuant to Section 169 (2) of Act C of 2000 on Accounting.

The following are regarded as immediate family members: a spouse, any direct line relative, an adopted, step or foster child, an adoptive, step or foster parent, or a sibling, or a partner.

4. Data Subjects

The person reporting the death, the death beneficiary named by the customer, the immediate family member requesting information regarding the deceased's loans, the person named as an heir or usufructuary in the grant of probate, the death certificate, the certificate of succession or European Certificate of Succession, the legal representative or guardian of a minor heir, or the legal representative (guardian, authorised representative) of an adult heir

5. Source of the processed data

5.1 In case the information is provided by the Data Subjects

Death certificate, grant of probate, certificate of succession, European Certificate of Succession, and, in the case of a loan secured by payment protection life insurance, the post-mortem examination certificate required for the insurer's claims settlement.

5.2 In case the information is obtained not from the Data Subject

Authorities (e.g. the Hungarian State Treasury, guardianship authority, police), a notary or public notary handling probate matters, a court, or a GRIinfo query regarding residential address information.

6. Recipients

6.1 Processors

The Bank does not use a third party data processor in the course of the data processing and does not disclose the provided data to any other recipients.

7. 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
Right of access, right to information	<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"> - for what purpose, - what kind of personal data, - on what legal basis and - to whom are transmitted, and - for how long the data are processed. <p>If you have not provided your personal data to the Bank, you may request information about the source of the data.</p>

Data subject right	Rights you are entitled to
Right to rectification	<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>
Right to erasure ("right to be forgotten")	<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"> - 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); - is necessary for exercising the right of freedom of expression and information; - 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; - 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). <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>
Right to restriction of processing	<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"> - you dispute the accuracy of the personal data, in which case the restriction shall last until the Bank is able to verify their accuracy; - the processing is unlawful and you oppose the erasure of the data and request the restriction of their use instead; - 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; - 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.

Data subject right	Rights you are entitled to
Right to data portability	You have the right to <ul style="list-style-type: none"> - request the personal data concerning you, which you have provided to the Bank, in a structured, commonly used and machine-readable format; - 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; - have the personal data transmitted directly from one controller (such as the Bank) to another, where technically feasible.
Right to object	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.

For more details concerning the rights of Data Subjects, see the chapter "Rights of the Data Subjects" in the Bank's [General Privacy Policy](#).

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. 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/illetekessegkereso>.

9. Further information

The Bank shall have the right at any time to change the content of this Privacy 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 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 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.