Raiffeisen Bank

Privacy Policy

on Data Processing Related to the Central Credit Information System (“KHR”)

Effective as of: 27 July 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 particular 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 an e-mail sent to the address 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. What is the purpose of data storage in the KHR?

The purpose of the transmission and storage of data to/at the KHR is to make a closed-system database available to the creditors, enabling a more informed assessment of creditworthiness, the fulfilment of the preconditions for responsible lending and the mitigation of credit risk, in view for the security of borrowers as well as of the credit institutions.

Besides a “negative” list including defaulted debtors having repayment obligations, the KHR stores the data of “positive” debtors as well, who perform their debts contractually as they become due. This data processing is regulated in detail in Act CXXII of 2011 on the Central Credit Information System (the “KHR Act”).

In view for the implementation of these objectives, financial institutions transmit data to, and receive data from, the KHR. In the KHR database, only and exclusively the data specified in the law may be stored, and these may be used only and exclusively for the purposes defined in the law.

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For the purposes of this Privacy Policy:

"**Reference data provider**" means Raiffeisen Bank Zrt.

Data of the financial enterprise operating the KHR: BISZ Zrt. (**registered office:** 1205 Budapest, Mártonffy utca 25-27., **website**: www.bisz.hu, **phone**: (+36 1) 421-2505, (+36 70) 462 8505)

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

Purpose of the processing	Legal basis of the processing	Categories of processed data	Retention period
Prior to the conclusion of the contract that is the subject of the data provision, the reference data provider (Bank) receives data from the financial institution operating the KHR (BISZ Zrt.)	If the natural person customer gives their consent: compliance with a legal obligation and the customer's consent in accordance with Art. 6(1)(a) and (c) of the GDPR If the natural person customer refuses to give consent: compliance with a legal obligation in accordance with Art. 6(1)(c) of the GDPR in the case of businesses: compliance with a legal obligation in accordance with Art. 6(1)(c) of the GDPR	If the natural person customer gives their consent: a) identification data, b) details of the contract that is the subject of the data provision, c) data related to the use of cashless payment instruments, d) and, where applicable, information regarding the debt settlement procedure. If the natural person customer refuses to give consent: a) information regarding the refusal to give consent (date of statement, identification information concerning the reference data provider, customer identification data, note indicating refusal to consent) b) data on the loan payment default c) information/facts related to the disclosure of false information that can be proven by a document d) the fact that the customer has been convicted with a	If a contract has been entered into, until termination of the contract in case of a natural person customer, after termination of the contract a) identification data b) details of the contract that is the subject of the data provision: - type and identifier (number) of the contract, - date of execution, expiry and termination of the contract, - customer role (debtor, co-debtor), - currency and amount of the agreement, currency and amount of the repayment, and the method and frequency of repayment Where no contract is concluded: In the event of denial, or in the event of an approval if the data subject does not

		final judgment by a court for a criminal offense specified by law, including the use of false or counterfeit documents or the use of cash substitutes e) the fact that the customer has been involved in debt settlement proceedings as a debtor, co-debtor, or obligor in the case of businesses: a) company identification information b) details of the contract that is the subject of the data provision c) data concerning the bank accounts where queuing claims are recorded d) data of the agreement concerning the honouring of cash substitute payment instruments	proceed with the application process, the general limitation period as per the Civil Code (5 years) Section 166/A of the Banking Act (2) A financial institution may process customer data and personal data constituting bank secrets related to an unconcluded service contract as long as a claim may be asserted in connection with the failure of the contract. (3) Unless otherwise provided by law, the general limitation period set forth in the Civil Code applies to the enforcement of claims.
Following the conclusion of the contract that is the subject of the data provision, the reference data provider (Bank) transfers data to the financial institution operating the KHR (BISZ Zrt.)	For natural person customers compliance with a legal obligation and the customer's consent in accordance with Art. 6(1)(a) and (c) of the GDPR in the case of businesses: compliance with a legal obligation in accordance with Art. 6(1)(c) of the GDPR	Natural person: a) identification data, b) details of the contract that is the subject of the data provision (Chapter II, point 1.2 a)-d) of the KHR Act) in the case of businesses: a) company identification information b) details of the contract that is the subject of the data provision	until termination of the contract
Statement on the retention of reference data for up to 5 years following the termination of the contract	on the basis of the customer's consent in accordance with Article 6(1)(a) of the GDPR	a) identification data, b) data concerning the contract and the customer's role, c) identification information regarding the statement and the reference data provider,	Until withdrawal of consent to the data processing, but not longer than 5 years from the termination of the legal relationship

		d) note indicating refusal to consent.	
Statement on e-communication	on the basis of the customer's consent in accordance with Article 6(1)(a) of the GDPR	e-mail address, phone number	until the consent is withdrawn, but no later than the termination of the contract
Data transfer obligation of the reference data provider (Bank) related to existing contracts to the financial institution operating the KHR (BISZ Zrt.)	compliance with a legal obligation in accordance with Art. 6(1)(c) of the GDPR	**regular:** a) currency and amount of the principal debt outstanding each month, currency and amount of the monthly instalment of the contractual amount; **ad hoc:** a) in the case of an early repayment, the fact of the early repayment, its date, the amount repaid, and currency and amount of the outstanding principal debt; b) in the event of a change in already submitted reference data, the modified reference data.	until termination of the contract
Data transfers related to certain events for which the natural person's consent to the data transfer is not required **Data provision related to certain events in the case of businesses**	compliance with a legal obligation in accordance with Art. 6(1)(c) of the GDPR Sections 11-13/A and Sections 14-14/B of the KHR Act	**In case of a natural person** *a) in cases of failure to make loan payments as defined by law:* reference data as per Chapter II points 1.1–1.2 of the KHR Act *b) disclosure of false information that can be proven by a document,* *c) in case of the use of a false or counterfeit document, the customer has been convicted by final judgment for a criminal offense specified by law* reference data as per Chapter II points 1.1 and 1.3 of the KHR Act *c) due to the use of a cashless payment instrument, the customer has been convicted by final judgment for a*	for 5 years from the data transfer

		criminal offense specified by law data as per Chapter II points 1.1 and 1.4 of the KHR Act *e) the customer has been involved in debt settlement proceedings as a debtor, co-debtor, or obligor* reference data as per Chapter II points 1.1 and 1.6 of the KHR Act **<u>in the case of businesses:</u>** *a) the customer fails to fulfil their payment obligation under the contract that is the subject of the data provision:* reference data as per Chapter II points 2.1–2.2 of the annex *b) the customer has breached their obligation under a contract for the acceptance of a cash substitute payment instrument, and as a result, the reference data provider has terminated or suspended the customer's contract for the acceptance of the cash substitute payment instrument:* reference data as per Chapter II points 2.1 and 2.4 of the annex, *c) with respect to the customer's payment account, claims totalling more than one million forints are recorded continuously for a period exceeding thirty days due to insufficient funds:* reference data as per Chapter II points 2.1 and 2.3 of the annex	

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Sending of information intended to protect customers by the reference data provider (Bank) to customers	compliance with a legal obligation in accordance with Art. 6(1)(c) of the GDPR	The information provided covers: the purpose of the KHR registry; the rights of the registered individual to decide which of their data are to be transferred, sample notice published by the National Bank of Hungary on its website, warning before data transfers related to specific events	until termination of the contract
Keeping records of the data transfers between the financial institution operating the KHR and the reference data provider	compliance with an obligation in accordance with Art. 6(1)(c) of the GDPR	the fact that data has been transferred, the date of the transfer, and the scope of the data transferred	for five years from the date specified in the KHR Act
Data transfer in the event the claim arising from the contract that is the subject of the data provision is assigned to another reference data provider	compliance with an obligation in accordance with Art. 6(1)(c) of the GDPR	all documents and information necessary for the performance of the reference data service	until termination of the contract 8 years for accounting certificates
Handling of objections regarding the processing and transfer of reference data	the customer's legitimate interest in accordance with Art. 6(1)(f) of the GDPR	the reference data on which the objection is based; the subject matter of the objection	Until the end of the 5-year limitation period as per the Civil Code

4. Recipients

4.1. Processors

Please be informed that no processor is involved by the Bank in the data processing.

5. Rights of the Data Subjects

Please note that you have the following data subject rights under the GDPR.

Data subject right	Rights you are entitled to
Withdrawal of consent	You can amend or withdraw your consent at any time free of charge, without restrictions and without giving any reason. The withdrawal of your consent will not affect the lawfulness of any earlier data processing performed under such consent before the withdrawal.
Right of access, right to information	You may request information on whether the Bank processes your personal data and, if so, you may request that the Bank inform you regarding - 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. If you have not provided your personal data to the Bank, you may request information about the source of the data.
Right to rectification	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.
Right to erasure ("right to be forgotten")	You have the right to request the deletion of your personal data, which the Bank must comply with without undue delay. The Bank is not obliged to delete your personal data even at your request if the processing of your personal data - 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

Data subject right	Rights you are entitled to
	(e.g. the data are needed to be used as evidence in a judicial process). 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.
Right to restriction of processing	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. Please note that you can request the restriction of your data if one of the following conditions is met: - 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.
Right to data portability	You have the right to - 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.

Please be further informed that you can find more details concerning the rights you are entitled to in the Bank's General Privacy Policy, in the chapter "Rights of the Data Subjects".

6. Legal remedies

If you believe that the data recorded about you in the KHR has been transferred unlawfully or incorrectly, **you may request the rectification or deletion of the data**. You may submit your objection to the financial institution (bank) that transferred the data or to BISZ Zrt. You will be **notified in writing** of the results of the review of your objection within 7 business days at the latest.

If you are not satisfied with the information you received regarding your objection, you may file a complaint with the district court with jurisdiction over your place of residence within 30 days of receiving that information.

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.

You have the right to file a consumer complaint with the MNB if you believe that the institution that transferred the data did not comply with the disclosure rules described above.

7. 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 Part 1, 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.

Further information on this subject is also available in the MNB's website https://www.mnb.hu/letoltes/kozponti-hitelinformacios-rendszer.pdf