

Privacy Policy

for the Merchant Portal used for card acceptance services

Effective as of: 01 September 2024

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.; company registration number: 10-041042; tax number: 10198014-4-44)

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 Bank's data protection officer is dr. Gergely Balázs.

2. Processing purpose

The Bank provides a card acceptance service to its Customers (the "Merchants"), which may be used in one of the following three forms: POS (physical card acceptance terminal), vPOS (web-based payment and card acceptance technology solution), and SoftPOS (mobile-based payment and card acceptance technology solution) (hereinafter collectively, the "Service"). In order to simplify and accelerate the process of applying for the Service, and to ensure the online manageability of the Services already used, the Bank provides Merchants with an online interface (the "Merchant Portal"). The Bank may request data and information from the Merchant through the Merchant Portal during the contracting process, and may send notifications and provide documents to the Merchant through the Merchant Portal after the contract has been concluded.

The Bank also provides the Service to such Merchants (e.g. farmers, sole proprietors, one-man companies) who are regarded as natural persons for the purposes of data protection law (hereinafter "Natural Person Merchant").

A Natural Person Merchant may use the Merchant Portal to select the Service forms that are suitable for him/her, to provide all the data required to use the Service (e.g. name, registered office, tax number, registration number, activities), to make declarations, to make an express legal statement for the conclusion of a contract with the Bank for the use of the Service, and to manage a Service already used.

In order to achieve the above purposes, the Bank processes the personal data as per Section 6 of the Natural Person Merchant for the purpose of facilitating the submission of the Natural Person Merchant's request for the conclusion of a contract for the use of the Service, and the conclusion of the contract for the Service.

In line with the above purposes, in order for the Bank to be in contact with the Merchant during the negotiations for the conclusion of the contract for the Service and, in the case of an already concluded contract, in connection with the performance of the contract, the Bank processes the personal data as per Section 6 of the persons identified by the Merchant as contact persons on the Merchant Portal (the "Contact Person").

On the Merchant Portal, an authorised third party (the "Representative") may also act on behalf of the Merchant on the basis of an appropriate legal title (e.g. power of attorney). The Bank shall process the personal data as per Section 6 of the Representative for the purpose of determining which person has acted on behalf of the Natural Person Merchant on the Merchant Portal, and what statements he/she has made and what data and information he/she has recorded.

3. Legal basis of the processing

- In the case of a Natural Person Merchant, the performance of a contractual obligation between the Bank and the Natural Person Merchant pursuant to Article 6(1)(b) of Regulation (EU) 2016/679 of the European Parliament and of the Council ("General Data Protection Regulation" or "GDPR").
- In the case of a Contact Person, the legitimate interest of the Bank in the performance of the obligation of cooperation and the obligation of providing information arising from the contract with the Service User pursuant to Article 6(1)(f) of the GDPR.
- In the case of a Representative, the legitimate interest of the Bank in verifying the representative's eligibility to act on behalf of the Merchant pursuant to Article 6(1)(f) of the GDPR.

4. Data Subjects

The persons concerned by the data processing are the Natural Person Merchants, Representatives and Contact Persons.

5. Categories of processed data

- In case of a Natural Person Merchant: name, registered office, tax number, registration number, address of the place of acceptance, business activity, previous year's sales revenue, merchant transaction history
- For Contact Persons: name, phone number, email address
- For Representatives: name, Raiffeisen DirektNet ID, Electra ID

6. Retention period of the data

The Bank shall retain the processed personal data—with the exception of the merchant transaction history processed in case of a Natural Person Merchant—in accordance with Articles 56-59/A of the Act on the Prevention and Combating of Money Laundering and Terrorist Financing (the "Money Laundering Act") and Act C of 2000 on Accounting (the "Act on Accounting"), for a period of 8 years from the termination of the customer relationship.

In the event that the conclusion of the contract fails, the Bank will retain the personal data processed for 5 years from the date of the failure.

Personal data relating to merchant transaction history will be kept by the Bank for 2 years from the date of origination of the data.

7. Involvement of data processors

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)

8. Rights of Data Subjects

Please note that you may be entitled to the rights of Data Subjects under the GDPR (e.g. rights of access, rectification, erasure, restriction, data portability and objection), taking into account the specificities of data processing, which rights are described in detail in the Bank's [General Privacy Policy](#), in the section Data Subject Rights.

9. 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>.

10. 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.