Privacy Policy

on debt management

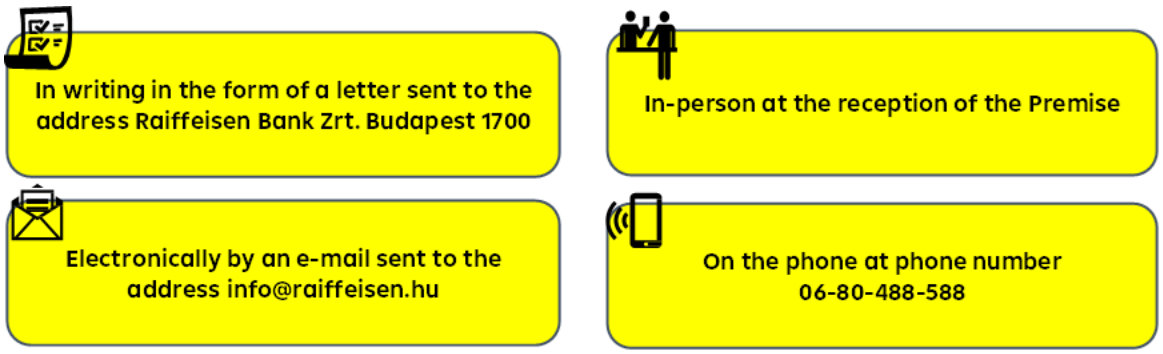
Effective as of: 10 November 2026

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.; company registration number: 01-10-041042; tax number: 10198014-4-44)

1.2. Contact details of the Bank's data protection officer



This Notice contains provisions relating to the processing activities carried out by the Bank in connection with debt management.

2. Debt collection activities relating to an existing contract

In the case of contracts currently in force, the purpose of the Bank's debt collection activities is to recover overdue and delinquent claims arising from the existing contract. In the course thereof, the Bank provides information on the outstanding debt to the obligors of the overdue debt — including the customer, co-debtor, guarantor, pledgor and any provider of security, as well as heirs, hereinafter collectively referred to as the "Obligor" — may contact them in person, and may collect information relating to the Obligors' cooperation in settling the debt, including, where applicable, information concerning bank accounts, security interests, claims, movable property or the condition of real property.

Where the Obligors cooperate, the Bank facilitates the restoration of their repayment capacity for the purpose of settling the debt. To this end, the Bank requests data in order to determine the following: the reasons for and expected duration of the Obligor's payment difficulties, possible solutions, repayment relief options, rescheduling options, and possibilities for performing the contract.

On the basis of the data made available by the Obligor, a new credit assessment decision and an amendment of the contract may take place.

2.1. Legal basis of processing

The legal basis under Article 6(1)(b) of the GDPR: processing is necessary for the performance of a contract to which the data subject is a party.

2.2. Categories of processed data

The identification data and contact details of the Obligor, as well as data relating to the contractual relationship in question and the performance thereof.

2.3. Duration of processing

The processing continues until the claim is settled or the contract is terminated. Following termination of the contract, the Bank retains the data for 8 years pursuant to Sections 56–58 of Act LIII of Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (the "Money Laundering Act").

3. Debt collection activities relating to a terminated contract

In the case of terminated contracts, the purpose of the Bank's debt collection activities is to recover overdue claims arising from the terminated contract. In the course thereof, the Bank provides information on the outstanding debt to the Obligors of the overdue debt, may contact them in person, and may collect information relating to the settlement of the debt, including, where applicable, information concerning bank accounts, security interests, claims, movable property or the condition of the real property serving as collateral. In the case of a terminated contract, if the debt is not settled, the Bank processes personal data in the course of enforcing its legal interests, with a view to maximising recovery of the claim.

3.1. Legal basis of processing

The legal basis under Article 6(1)(f) of the GDPR: processing is necessary for the purposes of the legitimate interests pursued by the controller; the Controller's legitimate interest is to enforce the claim.

3.2. Categories of processed data

The identification data and contact details of the Obligor, as well as data relating to the contractual relationship in question and the performance thereof.

3.3. Duration of processing

The processing continues until the claim is settled, but in any event no longer than the period justified by any judicial or administrative proceedings initiated against or by the data subject, including in particular until the final court decision is rendered in the relevant case or until successful enforcement proceedings have been conducted. Following settlement of the overdue claim, the Bank retains the data for 8 years pursuant to Section 169(1)–(2) of Act C of 2000 on Accounting ("Accounting Act").

4. Sale of claims

The Bank may sell its claim arising from a terminated contract by way of assignment. In the course of the assignment, the Bank transfers personal data to the assignee to the extent necessary to prove the existence of the claim and the related security interests, which data may also qualify as banking secret. Exemption from the obligation to maintain banking secrecy is provided by Section 161(1)(c) of Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises.

4.1. Legal basis of processing

The legal basis under Article 6(1)(f) of the GDPR: processing is necessary for the purposes of the legitimate interests pursued by the controller; the Controller's legitimate interest is to sell the claim. The processing is also based on Section 161(1)(c) of Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises, and Section 6:193 of Act V of 2013 on the Civil Code.

4.2. Categories of processed data

The identification data and contact details of the Obligor, data relating to the contractual relationship in question and the performance thereof, as well as data concerning the steps taken by the Bank to enforce the claim and data generated in connection with any legal proceedings.

4.3. Duration of processing

The processing continues until the data are transferred to the assignee. The Bank retains personal data relating to the sold claim for eight years following the end of the financial year in which the sale took place, on the basis of Article 6(1)(c) of the GDPR and pursuant to Section 169 (1)–(2) of the Accounting Act.

5. Telephone communications relating to debt collection

Communications between the Obligor and the Bank in connection with debt collection take place via recorded telephone lines in order to ensure that such communications can be reconstructed and are available during the administration of debt collection matters.

5.1. Legal basis of processing

Where the data subject provides the Bank with further information concerning the claim via the Bank's recorded telephone lines, the legal basis for the processing is the Controller's legitimate interest under Article 6(1)(f) of the GDPR in ensuring the comprehensive administration of matters relating to debt collection. In the case of special categories of personal data, processing is carried out with the explicit consent of the data subject pursuant to Article 9(2)(a) of the GDPR.

5.2. Categories of processed data

The data subject's telephone number, voice, and the content of the call.

5.3. Duration of processing

The Bank retains communications conducted via recorded telephone lines in its systems for a maximum period of 5 years. At the request of the data subject, the Bank prepares a copy of the voice recording and provides it to the requesting data subject within 30 days of receipt of the request.

6. Data transfers

For the purposes described in Sections 2 and 3 above, the Bank transfers personal data relating to the Obligors of the claim, which are necessary for the recovery of the claim and may also qualify as banking secret, primarily but not exclusively to intermediaries, external debt collection agencies, bailiffs, legal representatives and notaries public (hereinafter: "Third Parties"), for the purpose of the recovery of the claim by a third party.

Exemption from the obligation to maintain banking secrecy is provided by Section 161(1)(c) and Section 164(j) of Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises.

The legal basis for the data transfer is Article 6(1)(f) of the GDPR: processing is necessary for the purposes of the legitimate interests pursued by the controller; the Controller's legitimate interest is to ensure the recovery of the claim.

Where the claim is recovered by Third Parties, the processing continues for the duration of the legal relationship between the Bank and the Third Parties.

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	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

Data Subject right	Rights you are entitled to
	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). 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 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".

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 protection and privacy policy, 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.