

Privacy Policy

On the processing of secondary account identifiers

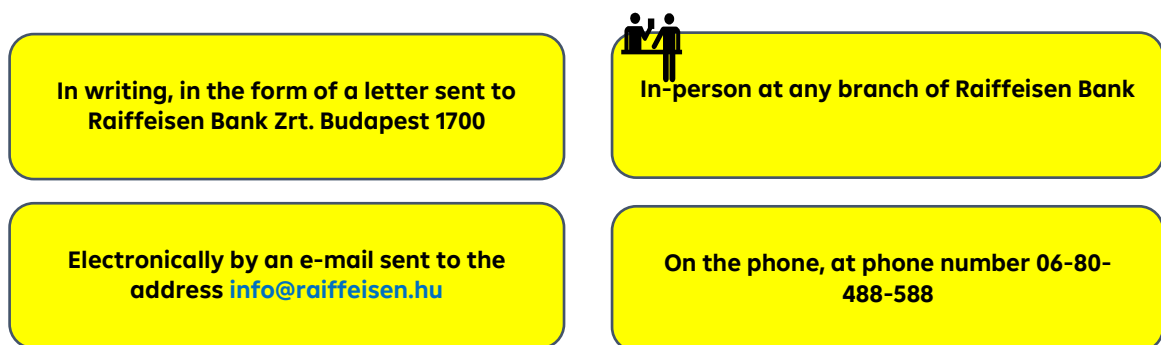
Effective as of: 26 March 2025

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



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

2. General information about this processing

Please be informed that the Bank does not act as a third party service provider in relation to the assignment of a secondary account identifier pursuant to Articles 4-4/A of MNB Decree 35/2017 (XII.14.) on the handling of payments (the "MNB Decree"), or the modification or deletion of an already notified secondary account identifier. This means that account holders who maintain their payment account with a payment service provider other than the Bank cannot initiate the assignment (modification, deletion) of a secondary account identifier at the Bank in order to identify their payment account held at such other payment service provider, and therefore no personal data processing is carried out in this context.

Account holders whose payment account is managed by the Bank—i.e. that are customers of the Bank—may initiate the assignment (modification, deletion) of a secondary account identifier directly with the Bank, but they are also entitled to initiate the assignment (modification, deletion) of a secondary account identifier through a third party service provider by means of a notification addressed to the Bank. The Bank carries out the assignment (modification, deletion) of secondary account identifiers on the basis of a notification initiated by its own customers in one of the ways specified above. The purpose of this notice is to describe in detail the circumstances of the data processing related to these tasks of the Bank.

3. Processing purpose

The purpose of data processing is the assignment pursuant to Art. 4 (1) of the MNB Decree of a secondary account identifier for the identification of the payment account, or the modification or deletion of an already notified secondary account identifier pursuant to Art. 4 (5) of the MNB Decree; in this context, also the verification of the right to use, modify or delete secondary account identifiers pursuant to Art. 4 (8) of the MNB Decree; and furthermore an annual reconciliation of data in order to ascertain the validity of secondary account identifiers pursuant to Art. 4/A (7) of the MNB Decree.

4. Legal basis of the processing

The legal basis for the data processing related to the assignment of a secondary account identifier, or the modification and deletion of an existing secondary account identifier [recording, verification of eligibility and data transfer to GIRO Elszámolásforgalmi Zrt. (1054 Budapest, Vadász utca 31., company registration number: 01-10-041159)], in accordance with Art. 4/A (1) of the MNB Decree, is the consent of the data subject pursuant to Art. 6 (1) (a) of the GDPR.

The consent of the data subject to the data processing must always be obtained by the authorised person who initiates the assignment, modification or deletion of the secondary account identifier (Art. 4/A (1)-(2) of the MNB Decree).

The legal basis for the data processing related to the data reconciliation aimed to verify the validity of the secondary account identifier, in accordance with Art. 6 (1) (c) of the GDPR, is compliance with the legal obligation defined in Art. 4/A (7) of the MNB Decree.

5. Data subjects

- Authorised person: the account holder, any person authorised by law to act on behalf of the account holder, and any other person authorised by the aforementioned persons to dispose of the account [Art. 2 (1) (16) of the MNB Decree].
- Account holder: the party that enters into an account contract with the payment service provider managing the account [Art. 2 (1) (17) of the MNB Decree].

6. Source of the processed data

The Bank may collect personal data from the following sources.

- The data subjects as defined in Section 4 of this notice.
- GIRO Elszámolásforgalmi Zrt. (1054 Budapest, Vadász utca 31., company registration number: 01-10-041159).
- The third-party service provider with whom the authorised person may initiate the assignment of a secondary account identifier pursuant to Art. 4 (1) of the MNB Decree.
- The persons entitled to initiate the assignment of a secondary account identifier.

7. Categories of processed data

- Name; IBAN of the payment account included in the notification and the secondary account identifier assigned to it, e.g. mobile phone number containing a country code referring to an EEA state as a geographical area, e-mail address, tax identification number established by

the state tax and customs authority, tax number (Art. 4/A (1) a), Art. 4 (1), and Art. 4/A (7) of the MNB Decree).

8. Retention of data

The personal data are processed until the consent is withdrawn (until the secondary identifier is deleted or modified), but not later than the termination of the payment account to which the secondary identifier has been assigned (Art. 4/A (9) of the MNB Decree). Data processing shall also cease if, in the course of the annual data reconciliation pursuant to Article 4/A (7) of the MNB Decree, the Bank determines that the secondary account identifier assigned to the payment account is no longer valid, and also in the event that the annual data reconciliation is unsuccessful pursuant to Article 4/A (8) of the MNB Decree.

9. Recipients

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

Please be informed that if the consent of the data subjects as defined in Section 5 of this notice is granted, the Bank will transfer the personal data of the data subjects to GIRO Elszámolásforgalmi Zrt. (1054 Budapest, Vadász utca 31., company registration number: 01-10-041159).

10. 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	You may request information on whether the Bank processes your personal data and, if so, you may request that the Bank inform you regarding <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. If it is not you who have provided your personal data to the Bank, you may request information about the source of the data. Pursuant to Article 26 (4) of the Complaints Act, the personal data of the Whistleblower may not be disclosed to the Person Concerned under the exercise of the latter's right of access.
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

Data subject right	Rights you are entitled to
	processing.
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 mandatory 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.
Right to data portability	<p>You have the right to</p> <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.

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".

11. 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/illetekesselkereso>.

12. Further information

Pursuant to Article 27(1) of the Complaints Act, personal data may only be accessed by persons involved in the investigation of the whistleblowing report. The persons investigating the report may, pending the conclusion of the investigation or the initiation of formal charges as a result of the investigation, share the contents of the report and information on the data subjects with other departments or staff of the Bank to the extent strictly necessary for the conduct of the investigation, in addition to informing the data subjects.

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.