Privacy Policy

for the use of the Rea Virtual Assistant

Effective as of: 14 October 2026

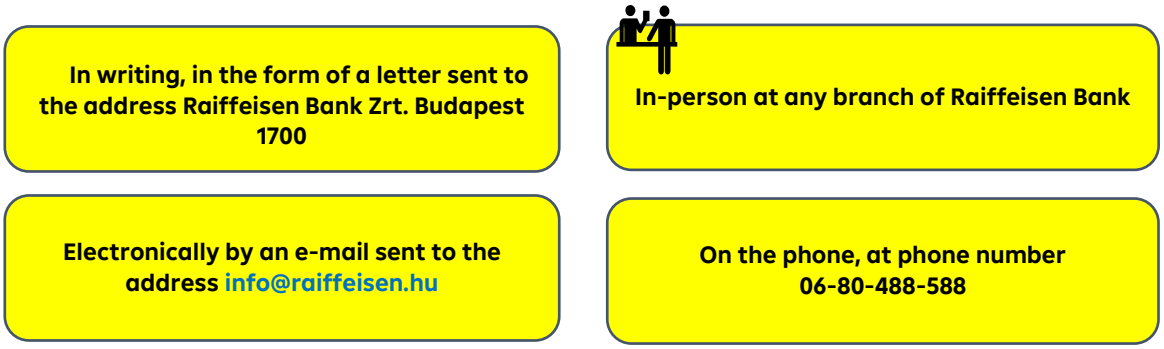
1. General provisions

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

2. Privacy policy regarding the Rea Virtual Assistant available on the MyRaiffeisen mobile app



2.1 General information about this processing

For those of its clients who are entitled to use the MyRaiffeisen and MyRaiffeisen Light mobile applications (hereinafter: the Client), the Bank provides an artificial intelligence-supported communication chat channel (hereinafter: Rea).

Rea has the following three main functionalities: segment-specific responses to questions raised by the Client without human involvement, directing within the application in order to access the services available there, and ensuring human communication, including real-time personal communication where required.

In the course of responses not requiring human involvement, with the support of artificial intelligence Rea automatically interprets and assesses the question, statement or problem raised by the Client in the conversation (hereinafter: the Request), on the basis of which it selects the most appropriate response to the Request, thereby providing Clients with a rapid, reliable and immediate source of knowledge and information. It may occur that Rea is unable to respond to the Request automatically without human involvement, or that the given information is not available in the application, or that the given instruction cannot be carried out. In such cases, Rea offers the assistance of a specialist colleague and directs the Client to the appropriate service channel, which, depending on the Request, may be a chat, an authenticated call or Raiffeisen Videobank. In the case of a Request that cannot be

answered via any of the channels listed above, it provides the possibility to book an appointment for branch administration.

When using the "Connect to an agent" feature, with the support of artificial intelligence, based on the interpretation of the Client's Request Rea may offer to the Client that live personal communication may be necessary and following the Client's specified request to this effect, Rea assigns a person acting on behalf of the Bank to conduct further communication with the Client. In this case, the Client has the possibility to give the instructions or make the statements defined in the contract in place for the use of the MyRaiffeisen or MyRaiffeisen Light mobile application (hereinafter: the Contract), and to submit complaints or data protection requests.

2.2 Purpose of the processing

The purposes of the processing are to ensure the proper, secure and reliable operation of Rea; to respond to Customers' questions; to record and handle Requests; to execute instructions in accordance with the Agreement and conclude any agreements made available through the channel; and to ensure the traceability of all such legal declarations.

Detailed information about the processing of personal data in connection with the services available is provided in the specific privacy notices published on the Bank's website (e.g. the Privacy Notice on the Provision of Payment Services, the Privacy Notice on the Provision of Credit, and the Privacy Notice on the Processing of Personal Data for the Prevention of Money Laundering and Terrorist Financing, Financial and Asset-Related Restrictive Measures, and International Tax Residence). These notices are available at the following link: **Data protection and privacy policy - Raiffeisen ENGLISH**.

2.3 Legal basis of the processing

The legal basis for the processing of the text and communications exchanged in the course of chats with Rea (i.e. the specific text entered) is the Bank's legitimate interests within the meaning of Article 6(1)(f) of Regulation (EU) 2016/679 of the European Parliament and of the Council (the "GDPR"). These legitimate interests consist of ensuring that the content of communications, instructions and contracts can be retrieved and used for the establishment, exercise or defence of legal claims.

The legal basis for the processing of personal data in connection with the provision of services is set out in the Bank's applicable specific privacy notices. As the range of matters that may be handled through the service is extensive and continues to expand, the relevant legal bases are not repeated in this Notice.

2.4 Data subjects

Customers.

2.5 Categories of processed data

Name; personal identification data; banking identification data; contact details; financial and payment data; contractual data; and any other personal data provided by the Customer during the conversation.**2.6 Retention of data**

The Bank shall retain the data (i.e. the specific text) processed in the course of chats with Rea for five years from the date on which the data are generated, in accordance with the limitation period set out in Section 6:22 of Act V of 2013 on the Civil Code.

Other data generated in connection with instructions given, contracts concluded or transactions carried out during the conversation shall be retained in accordance with the Bank's other privacy notices. Accordingly, the retention period applicable to the relevant instruction, contract or transaction may differ from the period specified above.

In this regard, we draw attention to the statutory data-retention obligations applicable to the Bank, which in certain cases require data to be retained for eight years from the termination of the relevant customer relationship (Sections 56–59/A of Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing).

2.7 Recipients

2.7.1 Data processors

Please be informed that in the scope of the processing of personal data the following processor is engaged by the Bank:

- Raiffeisen Bank International AG (registered office: 1030 Vienna, Am Stadtpark 9., Austria; registration number: FN 122119m[1])

3. Privacy policy regarding the use of the Rea Chatbot available on the website

Available on Raiffeisen Bank's website, the Rea Chatbot is a chatbot that uses artificial intelligence to answer general questions **without requiring the provision of personal information**, and is accessible to all website visitors without the need for identification. It can only assist with general questions regarding the Bank's products and services. **We expressly ask our customers not to provide any personal information or data classified as banking or trade secrets via the Rea Chatbot feature**, as this service operates without user authentication. Consequently, it is not possible to provide personal information or data classified as banking secrets or answer questions of this nature through this channel. For these reasons, the Bank does not consider the data stored in the Rea Chatbot to be personal data. We would also like to emphasise in this regard that the Bank is unable to link the conversations to specific individuals.

If you need personalised information, the Rea Chatbot can help you find the contact details of a relevant expert at the Bank; and if you are already a customer, you can use the personalised chat feature in the MyRaiffeisen mobile app to speak with Rea, the Bank's Virtual Assistant.

Since the Bank cannot rule out the possibility that visitors to the website may enter information classified as personal data into the Rea Chatbot's question field, we ensure—perhaps out of an abundance of caution—that any such data is protected as personal data. We retain these conversations for 5 years without linking them to specific individuals. In connection with the provision of the service, the Bank engages its parent company Raiffeisen Bank International AG (registered

[1] Registered with the Vienna Commercial Court

office: 1030 Vienna, Am Stadtpark 9, Austria; company registration number: FN 122119m[2]) as a subcontractor.

Please note that since the Rea Chatbot is not designed to send or receive personal information, the platform is not suitable for submitting complaints or requests either. The Bank offers several channels for this purpose, but the Rea Chatbot is not suitable for this.

4. Information on the VideoBank Service

If, while using Rea, the virtual assistant available through the MyRaiffeisen mobile application, it becomes necessary to handle the Customer's matter via an audiovisual channel, the Bank will, at the Customer's request and with the Customer's consent, direct the Customer to the VideoBank channel. Details of the processing of personal data are set out below.

4.1. Purposes of processing

The purpose of the processing is to provide online banking and a means of concluding contracts to the Bank's existing customers within the scope of services offered. At the Customer's express request, the Bank may direct the Customer from its virtual assistant service, Rea (within the MyRaiffeisen application), to the VideoBank service, where the Customer can handle banking matters remotely in a manner similar to in-person banking. In that case, an audio and video recording is made to record the details of the interaction in audio and visual form, ensure that the interaction can be traced and enable individual instructions to be evidenced.

Detailed information on the processing of personal data in connection with the services available through the VideoBank channel is provided in the specific privacy notices published on the Bank's website (e.g. the Privacy Notice on the Provision of Payment Services, the Privacy Notice on the Provision of Credit, and the Privacy Notice on the Processing of Personal Data for the Prevention of Money Laundering and Terrorist Financing, Financial and Asset-Related Restrictive Measures, and International Tax Residence). These notices are available at the following link: Data protection and privacy policy - Raiffeisen ENGLISH.

As the content of communications between the Customer and the Bank or its representative forms part of contractual declarations, and the Bank may be required to prove, in administrative proceedings or in the event of a dispute, that information was provided and customer due diligence was carried out, the Bank records the entire communication with the Customer.

The Customer may choose to use the VideoBank service voluntarily. The Bank expressly draws the Customer's attention to the fact that in-person banking services are available at its branches and that, subject to the applicable contractual terms, other banking channels may also be available for certain services.

When the Customer logs in to the VideoBank service, the Bank will provide information about the principal data protection provisions and explain where the Customer can find further details.

Please note that if more than one person takes part in a video call—for example, co-borrowers participating so that information can be provided to them jointly—the Bank will process those persons' data together during the video call where this follows from the nature of the service. If the Customer does not wish their data to be processed jointly in this way, they should handle their

[2] Registered with the Vienna Commercial Court

banking matters in separate video calls. To ensure compliance with applicable laws and the Bank's internal requirements, the Bank may ask Customers to ensure that no other person—particularly anyone not involved in the relevant transaction—appears in the video recording.

The Bank may use the contact details provided when using the VideoBank application to contact Customers or prospective customers if it identifies technical difficulties in using the channel. For the purposes described above, the Bank provides technical assistance to Customers and prospective customers to enable them to complete their banking matters successfully.

If a corporate customer wishes to use the VideoBank channel, the Bank will process the personal data of the representatives taking part in the interaction in accordance with the applicable confidentiality and data protection requirements. The Bank provides the representatives with the same safeguards for the protection of their personal data as it provides to individual Customers. Please note, however, that where a person authorised to represent a corporate entity makes a legal declaration on its behalf, the relevant data must also be processed as data of that corporate entity, which is entitled to access them. Those data will be retained for the period applicable to the Bank's relationship with the corporate entity and to the relevant data.

During and after the interaction, the Bank may seek feedback on the channel used and the quality of the service provided. Customers may provide feedback anonymously or in a form that identifies them. The Bank processes personal data for this purpose in accordance with its General Privacy Notice.

4.2. Legal basis for processing

The legal basis for making audio and video recordings is the data subject's explicit consent under Article 6(1)(a) of Regulation (EU) 2016/679 of the European Parliament and of the Council (the "GDPR"). The recording will not commence without such consent.

The legal bases for processing personal data in connection with the provision of services are set out in the Bank's applicable specific privacy notices. As the range of matters that may be handled through the service is extensive and continues to expand, those legal bases are not repeated in this Notice.

The legal basis for retaining audio and video recordings, in order to document individual Customer instructions and information provided to Customers and to ensure that they can be retrieved, is the Bank's legitimate interest under Article 6(1)(f) of the GDPR. This legitimate interest consists of being able to retrieve the content of communications and instructions and to use it, where necessary, for the establishment, exercise or defence of legal claims.

4.3. Categories of personal data processed

- The Customer's name, banking identification data, financial and payment data, and any other personal data provided by the Customer during the conversation;

- The Customer's voice and image, and contact details;

- Other documents and records provided by the Customer;

- The content of communications between the Customer and the Bank;

- Details of the service selected by the Customer, and of any instruction or transaction;

- Contractual data, instructions, and any other data or documents relating to the relevant product.

4.4. Data retention

The Bank retains:

- contractual declarations and related documentation, including audio and video recordings, for eight years after termination of the contract or of any claim arising from it; and

- data relating to the Customer's identity and contact details, and to customer due diligence measures, for eight years after termination of the business relationship with the Customer,

in accordance with Sections 56–59/A of Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing.

Unless the data processed through the use of VideoBank, including audio and video recordings, must be retained for a longer period for another reason, the Bank retains them for five years from the date they are created, in accordance with the limitation period set out in Section 6:22 of Act V of 2013 on the Civil Code.

Other data generated through instructions given, contracts concluded or transactions carried out during the conversation are retained in accordance with the Bank's other privacy notices. Accordingly, the retention period applicable to the relevant instruction, contract or transaction may differ from the period specified above.

In this regard, we draw attention to the statutory data-retention obligations applicable to the Bank, which in certain cases require data to be retained for eight years after termination of the relevant customer relationship (Sections 56–59/A of Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing).

4.5. Data processing

The Bank uses the following data processor in connection with the processing:

- Raiffeisen Bank International AG, registered office: 9 Am Stadtpark, 1030 Vienna, Austria; company registration number: FN 122119m.

5. 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 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.

Data Subject right	Rights you are entitled to
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, on grounds relating to your particular situation, at any time to the processing of your personal data based on Article 6(1)(f) of the GDPR, if you consider that the Bank is not processing your personal data appropriately for the purposes set out in this Privacy Notice. In such a case, the Bank must demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or which relate 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

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.

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 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.