

## **Privacy Policy**

### **for the use of the Rea Virtual Assistant**

Effective as of: 16 April 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](mailto:info@raiffeisen.hu)



On the phone, at phone number 06-80-488-588

#### **2. 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 or an authenticated call. 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.

In the Contact centre function, 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.

### 3. Purpose of the processing

The purpose of the processing of personal data is to ensure the appropriate, secure and reliable operation of Rea and to provide responses to Customers' Requests in accordance with the Agreement.

### 4. Legal basis of the processing

The legal basis for the processing is the performance of the Contract between the Bank and the Customer concerned pursuant to Article 6(1)(b) of the GDPR.

### 5. Data subjects

Customers.

### 6. Categories of processed data

Name, banking identification details, financial and payment data, other personal data provided by the Customer during the conversation.

### 7. Retention of data

The Bank retains the processed data for a period of five years from the date of their creation.

### 8. Recipients

#### 8.1. 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<sup>1</sup>)

### 9. 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
<p><b>Right of access, right to information</b></p>	<p>You may request information on whether the Bank processes your personal data and, if so, you may request that the Bank inform you regarding</p> <ul style="list-style-type: none"> <li>- for what purpose,</li> <li>- what kind of personal data,</li> <li>- on what legal basis and</li> <li>- to whom are transmitted, and</li> <li>- for how long the data are processed.</li> </ul> <p>If you have not provided your personal data to the Bank, you may request information about the source of the data.</p>

<sup>1</sup> Registered by the Vienna Commercial Court

Data Subject right	Rights you are entitled to
<p><b>Right to rectification</b></p>	<p>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.</p>
<p><b>Right to erasure ("right to be forgotten")</b></p>	<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"> <li>- 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);</li> <li>- is necessary for exercising the right of freedom of expression and information;</li> <li>- 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;</li> <li>- 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).</li> </ul> <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>
<p><b>Right to restriction of processing</b></p>	<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> <p>you dispute the accuracy of the personal data, in which case the restriction shall last until the Bank is able to verify their accuracy;</p> <p>the processing is unlawful and you oppose the erasure of the data and request the restriction of their use instead;</p> <p>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;</p> <p>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.</p>

Data Subject right	Rights you are entitled to
<p><b>Right to data portability</b></p>	<p>You have the right to</p> <ul style="list-style-type: none"> <li>- request the personal data concerning you, which you have provided to the Bank, in a structured, commonly used and machine-readable format;</li> <li>- 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;</li> <li>- have the personal data transmitted directly from one controller (such as the Bank) to another, where technically feasible.</li> </ul>

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".

## 10. 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](mailto: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>.

## 11. 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](http://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.