

Privacy Policy

on the use of the Global Investor Gate Platform

Effective as of: 1 July 2025

1. General provisions

Dear Data Subject, please be informed that you can find detailed information on the data processing of Raiffeisen Bank Zrt. in our General Privacy Policy available in the Bank's website; however, we think it is also important that we describe the distinguishing characteristics of this peculiar process in this policy in detail.

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



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

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

2. General information about this processing

Through the Global Investor Gate platform (hereinafter: GIG Platform), the Bank provides investment services — primarily related to custody and execution — to its legal entity clients holding securities accounts with the Bank (hereinafter: Client). The Client is entitled to use the GIG Platform only if it has expressly entered into an agreement with the Bank for this purpose.

The GIG Platform is an online interface through which persons authorised by the Client (hereinafter: Authorised Persons) are granted access to the Client's securities account on behalf of the Client and thereby become entitled to access information related to the securities account (including, in particular: account balances, account transactions, settlement and execution orders, corporate actions) and to submit certain orders. The Bank provides direct information to the Client regarding the range of services currently available via the GIG Platform.

The Authorised Person is entitled to use the interface only if they have accepted the contractual terms and conditions of the Bank regarding the use of the GIG Platform and have thereby entered into an agreement with the Bank for the use of the GIG Platform.

3. Purpose of the processing

The purpose of data processing is to ensure the secure and reliable operation of the GIG Platform, to guarantee the availability of services provided through the GIG Platform to Clients, and to ensure that only persons authorised by the Client have access to the Platform.

4. Legal basis of the processing

The legal basis for data processing is the legitimate interest of the Bank pursuant to Article 6(1)(f) of the GDPR, in order to perform the agreement entered into between the Bank and the Client for the use of the GIG Platform, as well as to ensure the exercise of the Authorised Person's authorised rights.

5. Data subjects

The Authorised Persons.

6. Categories of processed data

Name, e-mail address, client ID.

7. Retention of data

The Bank will retain the processed data for 7 years following the termination of the Authorised Persons' access rights to the GIG Platform, in accordance with Section 55(10) of the Bszt.¹

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 122119m²)

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
Right of access, right to information	<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"> - 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. <p>If you have not provided your personal data to the Bank, you may request information about the source of the data.</p>

¹ Act CXXXVIII of 2007 on Investment Firms and Commodity Dealers, and on the Regulations Governing their Activities

² Registered by the Vienna Commercial Court

Data Subject right	Rights you are entitled to
Right to rectification	<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>
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 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). <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.

Data Subject right	Rights you are entitled to
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".

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) 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>.

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 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.