Privacy Policy

on the joint processing of personal data in connection with the use of Raiffeisen Bank products and services offered as part of a joint promotion with Auchan

Effective as of: 4th November 2026

1. General provisions

The purpose of this Privacy Notice is to inform you about how **Raiffeisen Bank Zrt.** (registered office: 1133 Budapest, Váci út 116-118.; hereinafter: "**Raiffeisen Bank**") and **MH Magyarország Kereskedelmi Kft.** (registered office: 2040 Budaörs, Sport u. 2-4.; company registration number: 13-09-165237; hereinafter: "**Auchan**") (Auchan and Raiffeisen Bank hereinafter jointly referred to as the "**Parties**" or the "**Controllers**") process your personal data in connection with the provision of Auchan digital coupons earned through the use of Raiffeisen Bank products and services offered as part of a joint promotion with Auchan, and for certain data analysis purposes.

Please note that this Privacy Policy applies exclusively to the joint processing activities carried out in the course of the Parties' cooperation. The privacy policies concerning processing activities relating to the Auchan Bizalomprogram and Raiffeisen Bank products and services may be accessed and consulted via the referenced links.

1.1. Contact Details of the Data Protection Officers

If you have any questions concerning the Parties' joint data processing activities, please contact **Raiffeisen Bank's Data Protection Officer,** in writing in the form of a letter sent to Raiffeisen Bank Zrt., Budapest 1700; in person at any Raiffeisen Bank branch; by email to info@raiffeisen.hu; or by telephone at phone number 06-80-488-588. You may also contact **Auchan's Data Protection Officer** in writing in the form of a letter sent to 2040 Budaörs, Sport u. 2-4., or by email to adatvedelem@auchan.hu.

2. Joint Controllers and Details of the Joint Processing Activities

Your personal data are processed by Auchan and Raiffeisen Bank as joint controllers. Auchan and Raiffeisen Bank have entered into a joint controllership agreement (hereinafter: the "Agreement"), in which they have determined their respective rights and obligations in relation to the joint processing activities.

a) Processing purpose relating to participation in the promotion and the provision of digital coupons

In the course of processing, Raiffeisen Bank collects from you and subsequently processes your Bizalomkártya number, its active status, and your name. Raiffeisen Bank maintains a record of the number of digital coupons earned by you through the use of its products and services and transmits this information, together with your Bizalomkártya number, to Auchan for the purpose of issuing digital coupons. The Agreement does not restrict your right to submit a request concerning the joint processing activities to either Controller.

b) Data analysis purpose

Raiffeisen Bank analyses your transaction data arising from the use of a product applied for at an Auchan store and used subject to the conditions specified in the Promotion Description, and, on the basis of such analysis, provides data to Auchan in aggregated form, with all personal data removed. The data disclosed may comprise, at most, the following: age, sex, postcode/municipality of the place of purchase, store type (hypermarket, supermarket, discount store, convenience store), store category (e.g. clothing, groceries), purchase frequency broken down by month, and average basket value.

Raiffeisen Bank shall perform the analysis and provide its results to Auchan only if the number of customers – who have acquired a product at an Auchan store under the terms and conditions specified in the Promotional Description – reaches a threshold sufficient for data reporting based on the aforementioned filtering criteria, thereby ensuring that personal data relating to an individual data subject cannot be reconstructed from the analysis disclosed. Where the number of individuals within certain subgroups does not ensure anonymity, or does not adequately ensure anonymity, Raiffeisen Bank does not disclose the data to Auchan.

You are entitled to request further information concerning the processing of your data at any time. You also have the right to request and obtain human intervention, to express your point of view, to obtain an explanation of any decision that may have been taken on the basis of such assessment, and to raise objections. In particular, you may object to the analysis performed on your data.

c) Disclosure of data where digital coupons cannot be credited

If Auchan is unable to credit the number of digital coupons specified by Raiffeisen Bank to the data subject's Bizalomkártya because the card is inactive or has been terminated, Auchan provides Raiffeisen Bank with information concerning the fact that the crediting was unsuccessful and the reason for such failure.

3. Purposes of Processing

a) Purpose relating to participation in the promotion and the provision of digital coupons

We process your personal data to enable Raiffeisen Bank, in accordance with the contract concluded with you, to determine the number of digital coupons to which you are entitled in respect of products sold to you by Raiffeisen Bank at the Raiffeisen Financial Partner Points located in Auchan stores, and to transmit the relevant information to Auchan so that the digital coupons may be credited and displayed for you within the Bizalomprogram. Auchan's processing of your personal data contained in the statement transmitted by Raiffeisen Bank is necessary to enable Auchan to verify those data and take the measures required to issue, display and credit the digital coupons.

b) Data analysis purpose

As detailed in the preceding section, the purpose of processing is to provide aggregated data to Auchan through Raiffeisen Bank's analysis of your transaction data and information

constituting banking secrecy, taking into account the entire population in a manner that ensures anonymity, and not for the purpose of individual profiling. Auchan may use the disclosed data exclusively for lawful purposes, in particular to optimise its own operations. Auchan assumes responsibility for any further processing of the disclosed data and determines the purpose of such processing.

c) Disclosure of data to Raiffeisen Bank where digital coupons cannot be credited

This processing is necessary to ensure that Raiffeisen Bank is informed that the condition for crediting digital coupons is no longer satisfied.

4. Legal Bases for Processing

a) Purpose relating to participation in the promotion and the provision of digital coupons

The legal basis for the processing is the performance of the contract between Raiffeisen Bank and you pursuant to Article 6(1)(b) of the GDPR.

The provision of your personal data is necessary for the performance of the contract between Raiffeisen Bank and you. Without such data, we are unable to record and credit to you, within the Bizalomprogram, the digital coupons to which you are entitled in respect of your purchases.

b) Data analysis purpose

The legal basis for the processing is the legitimate interests of the Controllers pursuant to Article 6(1)(f) of the GDPR.

c) Disclosure of data to Raiffeisen Bank where digital coupons cannot be credited

The legal basis for the processing is the performance of the contract between Raiffeisen Bank and you pursuant to Article 6(1)(b) of the GDPR, having regard to the matters set out in point a).

5. Categories of Data Processed

a) Purpose relating to participation in the promotion and the provision of digital coupons

Yout Bizalomkártya number and its active status, as well as the value of the digital coupon issued to you – determined through an analysis of your transaction data, which is classified as bank secrecy.

b) Data analysis purpose

Transaction data arising from the use of a product provided by Raiffeisen Bank, applied for at an Auchan store and used subject to the conditions specified in the Promotion Description, which Raiffeisen Bank analyses and converts into analyses that do not constitute personal data.

Raiffeisen Bank provides the results of the analyses to Auchan. The data disclosed may comprise, at most, the following: age, sex, postcode/municipality of the place of purchase, store type (hypermarket, supermarket, discount store, convenience store), store category (e.g. clothing, groceries), purchase frequency broken down by month, and average basket value.

c) Disclosure of data to Raiffeisen Bank where digital coupons cannot be credited

The fact that Auchan is unable to credit the digital coupons because the Bizalomkártya is inactive or has been terminated.

6. Sources of Personal Data

a) Purpose relating to participation in the promotion and the provision of digital coupons

In the course of the processing operations carried out by Raiffeisen Bank, you provide your personal data directly to Raiffeisen Bank. We subsequently calculate the value of the digital coupons to which you are entitled on the basis of your spending. Auchan informs Raiffeisen Bank solely of the status of your Bizalomkártya so that we can perform your contract and generate the digital coupons in respect of an active card.

b) Data analysis purpose

The data used are transaction data generated in connection with your use of the product and relating to the performance of the service you have engaged. Accordingly, they originate from you and are generated through your activities. The analysis data does not contain personal data.

c) Disclosure of data to Raiffeisen Bank where digital coupons cannot be credited

The Controllers exchange the personal data with each other.

7. Data Retention Periods

a) Purpose relating to participation in the promotion and the provision of digital coupons

Your Bizalomkártya number and the digital coupons to be provided to you will be retained for eight years following the termination of the contract or the extinguishment of the claim, in accordance with Sections 56–59/A of Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing ("AML Act"). Please note, however, that the digital coupons provided may only be redeemed within one year of their date of issue. The retention

period is substantially longer because Raiffeisen Bank retains the data for an extended period in order to address potential claims and requests for the provision of data.

Data generated in connection with the Agreement that qualify as accounting records will be retained for eight years following the year in which the financial statements are approved, pursuant to Section 169 of Act C of 2000 on Accounting ("Accounting Act").

Please note, however, that the retention of transaction and customer data generated through the use of the product is governed by the provisions of Raiffeisen Bank's privacy notices applicable to the relevant product.

b) Data analysis purpose

The data underlying the analysis are subject to the retention periods specified in the privacy notices applicable to the relevant banking services and products. The data generated as a result of the analysis do not constitute personal data.

c) Disclosure of data to Raiffeisen Bank where digital coupons cannot be credited

Raiffeisen Bank retains information indicating that it is unable to make a credit and to make the funds covering the digital coupons available to the customer because the Bizalomkártya has an inactive or deleted status for eight years following the termination of the contract or the extinguishment of the claim, in accordance with Sections 56–59/A of Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing. Data qualifying as accounting records are, however, retained for eight years following the year in which the financial statements are approved, pursuant to Section 169 of Act C of 2000 on Accounting.

8. Recipients

8.1. Processors

Auchan does not engage any processors in connection with the processing.

Raiffeisen Bank engages the following processors in connection with the processing (hereinafter jointly referred to as the "**Bank Processors**"):

- Finance Sales Kft. (registered office: 1146 Budapest, Hungária krt. 140-144.; company registration number: 01-09-271449; tax number: 12804083-2-42)

- Raiffeisen Sales Partner Kft. (registered office: 1133 Budapest, Váci út 116-118.; company registration number: 01 09 453549; tax number: 32996793-4-41)

- Raiffeisen Bank International AG (registered office: 1030 Vienna, Am Stadtpark 9., Austria; company registration number: FN 122119m1)

Within the organisations of the Controllers and the Bank Processors, access to your personal data is granted exclusively, on a need-to-know basis, to employees who require such access for the performance of their duties and who are also required to maintain the confidentiality of your personal data.

8.2. Other recipients

We may disclose your personal data to courts, authorities and other public administrative bodies where necessary to comply with our legal obligations. We may also disclose your personal data to law firms and other external organisations involved where necessary to enforce or protect our rights and legitimate interests.

9. Data Subject Rights

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, 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.

Data Subject right	Rights you are entitled to
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 are met.
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 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.

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, to the data processing based on Art. 6(1)(f) of the GDPR, 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/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 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.