UniCredit Bank

ANNEX 2.
DATA CONTROLLING GUIDELINES (2TH NOVEMBER 2026)

I. Data of the Data Controller

Name	UniCredit Bank Hungary Zrt.
Registered office	1054 Budapest, Szabadság tér 5–6.
Postal address	1242 Budapest Pf. 386
E-mail address	info@unicreditgroup.hu
Website	www.unicreditbank.hu

Contact of the Data Protection Officer
adatvedelem@unicreditgroup.hu
1054 Budapest, Szabadság tér 5–6.

II. Data controlling guidelines

Definitions

processing: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

data transfer: ensuring access to the data for a predetermined third party.

data processing: performing technical tasks in connection with data processing operations, irrespective of the method and means used for executing the operations, as well as the place of execution, provided that the technical task is performed on the data.

data subject: any natural person directly or indirectly identified or identifiable by reference to specific personal data.

sensitive data: personal data revealing racial or ethnic origin, political opinion, religion or beliefs, trade union membership, as well as genetic data, biometric data used for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation

profiling: means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements

personal data: any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Purpose of processing

The purpose of data processing is the particular reason for which the collection, processing and controlling personal data is necessary. The purposes of the data processing cases implemented by the Bank are set out in section II of this Annex.

Processed personal data

The personal data processed by the Bank are set out in section II of this Annex.

Legal basis for processing

The Bank processes personal data only if data processing has a legal basis, that is, if

a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes,
b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract,
c) processing is necessary for compliance with a legal obligation to which the Bank is subject,
d) processing is necessary in order to protect the vital interests of the data subject or of another natural person,
e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Bank,
f) processing is necessary for the purposes of the legitimate interests pursued by the Bank or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

The legal bases for the data processing cases implemented by the Bank are set out in section II of this Annex.

Rights of the data subject

The Bank shall ensure enforcement of the following rights granted to data subjects, also cooperating with the data subjects in exercising their rights:

a) **right to information:**
the Bank shall – in line with the principle of fair and transparent data processing – provide the data subject, in compliance with the statutory regulations, with the information stipulated by law,

b) **right of access:**
the data subject shall have the right to obtain from the Bank confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the information specified by law. The Bank shall provide the data subject with a copy of the personal data undergoing processing. For any further copies requested by the data subject, the Bank may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form,

c) **right to withdraw a consent:**
if the legal basis for data processing is the data subject's consent, then data subject shall have the right to withdraw his or her consent at any time, although the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. After the consent has been withdrawn, the Bank may still process personal data in order to fulfill its legal obligations or to enforce its legitimate interests, provided that the interest enforcement is commensurate with the restriction on the right to personal data protection.

d) **right to rectification:**
the data subject shall have the right to obtain from the Bank without undue delay the rectification of inaccurate personal data concerning him or her, and to have incomplete personal data completed,

e) **right to erasure:**
the data subject shall have the right to obtain from the Bank the erasure of personal data concerning him or her without undue delay, which request may only be rejected in the cases stipulated by law, particularly if data processing is required for compliance with a legal obligation in Union or Member State law to which the Bank is subject, or if this is necessary for the establishment, exercise or defence of legal claims. If the data processing is stipulated by law, the Bank may not erase the data subject's data.

f) **right to be forgotten:**
this right requires that, where the Bank has made the personal data public and is obliged, pursuant to the right to erasure, to erase the personal data, then the Bank, taking account of available technology and the cost of implementation, shall take reasonable steps (including technical measures) to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

g) **right to restriction:**
the data subject shall have the right to obtain from the Bank restriction of processing, if
- the accuracy of the personal data is contested by the data subject (for a period enabling the Bank to verify the accuracy of the personal data),
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead,
- the Bank no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims, or
- the data subject objects to the processing, exercising his or her right to object (pending the verification whether the legitimate grounds of the Bank override those of the data subject),

h) **right to information on recipients who are notified of the rectification or erasure of personal data or restriction of processing:**
the Bank shall communicate any rectification or erasure of personal data or restriction of processing carried out at the data subject's request to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Bank shall inform the data subject about those recipients if the data subject requests it.

i) **right to data portability:**
if the legal basis for data processing is the data subject's consent or the performance of the contract, and processing is carried out by automated means, the data subject shall have the right to
- receive the personal data concerning him or her, which he or she has provided to the Bank, in a structured, commonly used and machine-readable format,
- and have the right to transmit those data to another controller without hindrance from the Bank,
- and, if technically feasible, they may request that their personal data be transferred directly between data controllers,

j) **right to object:**
The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data necessary in the Bank's or a third party's legitimate interest, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Bank, including profiling. The Bank shall no longer process the personal data unless the Bank demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. If the Bank processes personal data for direct marketing purposes (including profiling), then, in case of the data subject's objection, the personal data may no longer be processed for such purposes. The Bank agrees that the data subject shall have the right to object to his or her personal data for direct marketing purposes, at any time and free of charge,

k) **the data subject's right not to be subject to a decision based solely on automated processing:**
the data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her. This right shall not be granted to the data subject if the decision:
- is authorised by Union or Member State law to which the Bank is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests,
- is necessary for entering into, or performance of, a contract between the data subject and the Bank,
- is based on the data subject's explicit consent.
In the latter two cases the Bank shall grant the data subject the right to obtain human intervention on the part of the Bank, to express his or her point of view and to contest the decision

l) **rights related to audio recordings:**
the data subject may request that the audio-recorded phone conversation be replayed or a copy of it be provide to him or her, or, if the object of the conversation is a complaint, the issue of a certified report on the audio-recording.

m) **restriction or prohibition of data transfers within the bank group:**
the data subject may, by means of an explicit statement, at any time restrict or prohibit data transfer within the bank group (under Section 164/B of the Credit Institutions Act)

n) **right to judicial remedy:**
if the data subject considers that his or her personal data is controlled in breach of the statutory requirements, he or she may file a complaint with a data protection supervisory authority or seek effective judicial remedy. The data subject has the opportunity to contact the Bank's data protection officer before submitting the complaint or referring the matter to the court, and to inform him or her of the problem regarding the Bank's data processing.

Method of submitting the data subject's requests

The data subject may submit his or her requests related to processing
- by post, to the UniCredit Bank Hungary Zrt. 1242 Budapest Pf. 386 address,
- electronically, to the gdpr@unicreditgroup.hu e-mail address,
- by phone, on the +36(1/20/30/70) 325-3200 telephone number,
- personally, at the Bank's branch offices

Handling of the data subject's requests

The Bank shall inform the data subject of the action taken in response to his or her request within one month of receipt of the request submitted by the data subject. This deadline may be extended by two further months. The Bank shall inform the data subject of any such deadline extension within one month of receipt of the request, together with the reasons for the delay.

Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.

If the Bank does not take action on the request of the data subject, the Bank shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

Decision-making based on profiling

The Bank applies a profiling-based decision making process in the credit assessment, whereby it assesses creditworthiness against pre-defined criteria. In this process, a scoring system is used to process the data submitted during the application process to assess the applicant's willingness to repay and, in the case of an existing customer's application, financial information available to the Bank for a period of no more than 12 months in the form of a behavioural model.
Please note that our Bank monitors transaction data for credit management purposes, in particular with regard to the customer's repayment habits and the arrears of the transaction. The monitoring will include profiling, which may allow the Bank to review or modify the service.

Automated decision-making, including profiling

The Bank performs automated decision-making based on data processing (hereinafter referred to as "automated decision-making") during credit assessment process. In the course of the automated decision making, the Bank shall also carry out an assessment of the personal characteristics of the Applicant (profiling) in the course of the credit assessment in order to assess the risks related to the Applicant's ability to pay, on the basis of which it shall decide whether to conclude the credit agreement or reject the credit application.

During the profiling process, the Bank evaluates the creditworthiness of the Applicant on the basis of pre-defined criteria. The data provided at the time of application is processed in a scoring system to assess the applicant's willingness to repay, and the financial information available at the Bank is also evaluated on the basis of a behavioural model.

The purpose of automated decision making and profiling is to assess creditworthiness, perform risk analysis and evaluation.

As a result of the automated decision-making or profiling, the legal effect for you as Data Subject: conclusion of a credit agreement or rejection of the credit application.

You are informed that you have the right to request human intervention by the Bank against the decision, to express your views and to contest the decision using gdpr@unicreditgroup.hu e-mail address.

Profiling for direct marketing purposes

As part of its marketing and offer-preparation activities, the Bank may carry out profiling in order to provide customers with relevant and personalised offers and information.

Profiling is performed by analysing data related to the customer's product usage, service consumption, activity on digital channels, life situation and preferences. Profiling does not result in automated decision-making that would produce legal effects concerning the customer or significantly affect the customer in any similar way.

The processing of personal data for direct marketing purposes, including profiling, is based on the legitimate interest of the Bank.

The data subject may object to such processing at any time on grounds relating to his or her particular situation. In the event of an objection, the Bank will cease processing the personal data for these purposes in relation to the data subject until the objection is withdrawn.

Parties entitled to access data

The employees and agents of the Bank and of any other data controllers and data processors may access data to the extent required for the performance of the functions within their job responsibilities.

Recipients of the personal data

Recipients of the personal data are the data controller's agents and data processors. The parties involved in transferring personal data are listed in section III of these Data controlling guidelines.

Data processors

In relation to data processing, the Bank may use the services of a data processor. In this case the data processor performs processing on the Bank's behalf.
The Bank shall use only data processors providing sufficient guarantees to implement appropriate technical and organisational measures in such a manner that processing will meet the requirements of the statutory requirements and ensure the protection of the rights of the data subject.
The processor shall not engage another processor without prior specific or general written authorisation of the Bank.
The data processor listed in section V of these Data controlling guidelines.
The latest list of the data processors and the tasks performed by them will later be available on the www.unicreditbank.hu website and in the information notice available in the Bank's branches.

Data transfer within the bank group: (Section 164/B of the Hpt.)

The Bank and the financial institutions, payment institutions, electronic money institutions, investment firms, insurance companies, AIFMs and UCITS managers they control shall be allowed to exchange the personal data of clients they process, data classified as bank secrets, securities secrets, payment secrets and insurance secrets, and data classified as business secrets to the extent required in connection with their operations and for the provision of their services, in accordance with the standard contract terms of the data processors participating in such shared data processing, and they shall be permitted to transmit such data directly with a view to allowing access to their individual services, and to process the data thus received during the time period for setting up and during the existence of client relationships.

With regard to the Bank and other companies controlled by it, accessing and processing the data referred to above shall be allowed only to companies

a) such that are pursuing activities:
   aa) aiming to promote non-cash digital payment services and to provide consumers with such payment methods,
   ab) aiming to introduce digital applications to support the management of parties who are not consumers,
   ac) working to improve the financial awareness of consumers and to introduce digital financial means to them,

and

b) data processing is performed in the interest of setting up client relations in that context of services.

The current list of companies controlled by the Bank is as follows:

- UniCredit Jelzálogbank Zrt.
- UniCredit Leasing Hungary Zrt.

The client may, based on an express declaration, at any time restrict or prohibit the data transfer described above. Such declaration can be made

- by post, to the UniCredit Bank Hungary Zrt. 1054 Budapest, Szabadság tér 5-6 address,
- electronically, to the info@unicreditgroup.hu e-mail address,
- by phone, on the +36(1/20/30/70) 325-3200 telephone number,
- personally, at the Bank's branch offices.

Data protection

The Bank protects the controlled personal data by means of technical and organisational measures against unauthorised access, alteration, transfer, public disclosure, deletion or destruction, as well as damage and accidental loss, and ensures that the stored data cannot be corrupted and rendered inaccessible due to any changes in or modification of the applied technique.
For the protection of data sets stored in its different electronic filing systems, the Bank will introduce suitable technical solutions to prevent, unless this is permitted by law, the interconnection of data stored in these filing systems and the identification of the data subjects.

Liability, restitution

The Bank shall be liable for any damages caused to a data subject as a result of unlawful processing or by any breach of data security requirements, and, provided that the infringement has been recognised or established with legally binding effect, it shall pay compensation for damages. In the event of violation of the data subject's personality rights, the data subject may claim restitution (Section 2:52 of the Civil Code). The Bank shall also be liable for damage caused by the data processor whose services it is using. The Bank shall also bear liability for damages caused by a controller that is in a joint controller relationship with the Bank.
The Bank shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

Possibility for seeking judicial remedy or lodging a complaint

Regarding lawfulness of data processing, the data subject can initiate a procedure with the National Authority For Data Protection and Freedom of Information (1055 Budapest, Falk Miksa utca 9-11, postal address: 1363 Budapest, Pf.: 9., website: www.naih.hu, tel.: +36 (1) 391-1400, fax: +36 (1) 391-1410, central e-mail: ugyfelszolgalat@naih.hu) or he/she may take the matter to the court competent in the region where the Bank's head office or his or her (permanent or temporary) residence is located.
We recommend that you contact our data protection officer before turning to the National Authority for Data Protection and Freedom of Information or to the court.

III. Purposes of processing, legal bases, processed personal data, duration of data processing

Data processing cases

A) Data processing related to the provision of financial services
- A/1. New loan or new credit card application, loan administration, risk analysis and assessment, avoidance of future losses to the Bank
- A/2. Provision of credit and cash loans
- A/3. Financial administration of special schemes (e.g. state-subsidised loans, employer loans)
- A/4. Taking deposits and receiving other repayable funds from the public, in excess of equity
- A/5. Provision of payment services
- A/6 Commercial activities in foreign currency, foreign exchange, other than currency exchange services, bills of exchange and cheques on own account or as commission agents
- A/7. Provision of sureties and bank guarantees, or the assumption of other bankers' obligations.
- A/8. Provision of safe custody service and safe deposit box service
- A/9 Issuance of paper-based cash substitute payment instruments (e.g. paper-based traveller's cheques, bills of exchange) or provision of services related thereto that are not classified as payment services;
- A/10. Intermediation of financial services, and intermediation of insurance under the terms provided for in the Act on Insurance Companies and the Insurance Business
- A/11. Credit pre-screening where initiated, information about credit options and contacting the inquirer about credit options and credit pre-screening using the contact details provided in the case of telephone inquiries

B) Provision of auxiliary financial services
- B/12 Currency exchange activity

C) Investment and auxiliary investment services, and other services provided by the Bank on a professional basis
- C/13. Securities lending, nominee activities, investment services, services auxiliary to investment services, and intermediation and activities available to commodity dealers under Sections 111 to 116 of the Investment Services Act.
- C/14. Enabling the account holder to gain information on the actual data of the securities account and the customer account on the website of the National Bank of Hungary.

D) Other processing cases
- D/15. Market research, opinion polls, client satisfaction surveys
- D/16. Direct marketing, data controlling for marketing purposes, season's greetings, communication with individuals who use specific channels to inquire about the Bank's products
- D/17. Customer relations, arrangements for events, ongoing efforts to maintain data accuracy, complaints management, receivables management, other operational customer services
- D/18. Performance of the Agreement between the Government of Hungary and the Government of the United States of America to Improve International Tax Compliance and to Implement the FATCA
- D/19. Audio-recordings produced in the Bank's call center and other similar customer service / relevant sales areas operating on similar principles
- D/20. Monitoring, for property protection and security purposes, of entry to and exit from specific buildings and premises used by the Bank
- D/21. Production and retention of video recordings made, for the protection of confidential securities and business information, security, and the protection of human life and physical integrity, of natural persons intending to enter, for specific purposes, to the Bank's seat and establishments and other buildings used by the Bank as private areas open to the public
- D/22. Data controlling regarding to consumer clients of UniCredit Leasing Hungary Zrt.

Abbreviations

Taxation Act: Act CL of 2017 on Tax Administration Procedure

Investment Services Act: CXXXVIII of 2007 on Investment Firms and Commodity Dealers, and on the Regulations Governing Their Activities

GDPR: Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

FATCA Act: Act XIX of 2014 on the promulgation of the Agreement between the Government of Hungary and the Government of the United States of America to Improve

International Tax Compliance and to Implement FATCA and on the amendment of other related acts

Credit Institutions Act: Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises

CCIS Act: Act CXXII of 2011 on the Central Credit Information System

Act on Personal Data: Act LXVI of 1992 on the Registration of the Personal Data and Address of Citizens

AML Act: Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing

Personal Income Tax Act: Act CXVII of 1995 on Personal Income Tax

Accounting Act: Act C of 2000 on Accounting

Security and Investigators Act: Act CXXXIII of 2005 on Security Services and the Activities of Private Investigators

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
A) Data processing related to the provision of financial services				
A/1	**New credit card application, loan administration, risk analysis and assessment, avoidance of future losses to the Bank**			
1.	conclusion or performance of credit card contract	performance of contract	bank account number, details of the loan application (purpose and type of the loan, term, type of interest charged, loan amount, details of the housing loan, subsidies and preferential terms granted), details of the combined loan, personal data (name, birth name, place and date of birth, in case of mortgage loans the personal identification number, mother's birth name, residence, ownership of residence, mailing address, marital status, level of schooling), credit card data, the applicant's income and other details (confirmed regular monthly net income, other confirmed regular monthly income, regular monthly spending of the household, number of earners and dependent members in the household, type of legal relationship underlying the incomes), the loan applicant's regular financial commitments and debts, details of the collateral property (address, title number, type of property, means of construction, estimated market value)	8 years following the date on which the relevant contract ends (however arising) (Accounting Act), or a failed contract conclusion, the time that the claim related to the failed contract conclusion becomes enforceable
2.	credit card application/ conclusion of contract with biometric signature	consent	in case of application/contracting with biometric signature, the biometric data made available to the Bank with the signature on the sign pad	withdrawal of consent, or 8 years following the date on which the relevant contract ends (however arising)
3.	the client's identification in relation to a credit card contract	compliance with legal obligation (article 7 of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, mother's birth name, address of residence, or (in the absence of such) temporary residence, type and number of identification document, politically exposed person status, source of funds and assets in the case of politically exposed person	8 years from the termination of the business relationship or the execution of the transaction order
4.	identification of beneficial owner in relation to a credit or loan agreement	compliance with legal obligation (article 8 (2) of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, address of residence, or (in the absence of such) temporary residence, politically exposed person status	8 years from the termination of the business relationship or the execution of the transaction order
5.	Other business relationship information recorded in connection with the "Know your Customer" process	compliance with legal obligation (article 10 (1) of AML Act)	Type, duration and subject of the contract, level of risk of the client, circumstances of performance, other information on the purpose and intended nature of the business relationship	8 years from the termination of the business relationship or the execution of the transaction order
6.	verifying the authenticity and appropriateness of the personal data provided through the GIRinfO system	consent	name, address of residence, mother's name, number of identification document, photograph, signature	the contract's limitation period
7.	fulfilment of the obligation to retain accounting documents	compliance with legal obligation (Accounting Act)	data in the accounting document	8 years
8.	non-postal liaison	consent	e-mail address, phone number	withdrawal of consent / contract limitation period

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
A) Data processing related to the provision of financial services				
A/2	**Provision of credit and cash loans**			
1.	conclusion or performance of credit or loan contract	performance of contract	name, signature, name at birth, mother's birth name, place and date of birth, nationality, address of residence, ownership of residence, mailing address, in the case of mortgage loans the personal identification number, sex, marital status, legal status for currency purposes, politically exposed person status, fact of legal capacity, number of personal identity card (passport), number of other identification appropriate for identifying a person under the Act on Personal Data, in the absence of an address of residence the address of temporary residence, highest level of schooling, employer (including the place of work where different), position, income and method of payment (e.g. wire transfer), any garnishments (including reasons and amounts); sector of employment, (previous) employment relationship (including the beginning and end of the period of notice), term and type of entrepreneurship, participation in any undertaking from which income is derived, date of occupation of current residence; number of persons in the household, number of children under 14 in the household; net monthly income of partner or spouse, unconfirmed net monthly income, monthly spending, other (securities, cash, deposits), income and other details of the household (such as incapacity for work); monthly net income of any joint and several guarantors living in the same household; type of mobile phone (such as pre- or postpaid, company or private), data on the customer's rating for work-out purposes	8 years following the date on which the relevant contract ends (however arising) (Accounting Act); or a failed contract conclusion, the time that the claim related to the failed contract conclusion becomes enforceable / 45 days in case of electronic contracting
2.	credit or loan application / contracting with biometric signature	consent	in case of application / contracting with biometric signature, the biometric data made available to the Bank with the signature on the sign pad	withdrawal of consent, or 8 years following the date on which the relevant contract ends (however arising)
3.	conclusion or performance of credit or loan contract	compliance with legal obligation (Taxation Act, Personal Income Tax Act)	Tax ID number	contract limitation period / until the expiry of the right to tax determination
4.	identification of customer in relation to a credit or loan agreement	compliance with legal obligation (article 7 of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, mother's birth name, address of residence, or (in the absence of such) temporary residence, type and number of identification document, politically exposed person status, source of funds and assets in the case of politically exposed person	8 years from the termination of the business relationship or the execution of the transaction order
5.	identification of beneficial owner in relation to a credit or loan agreement	compliance with legal obligation (article 8 (2) of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, address of residence, or (in the absence of such) temporary residence, politically exposed person status	8 years from the termination of the business relationship or the execution of the transaction order
6.	Other business relationship information recorded in connection with the "Know your Customer" process	compliance with legal obligation (article 10 (1) of AML Act)	Type, duration and subject of the contract, level of risk of the client, circumstances of performance, other information on the purpose and intended nature of the business relationship	8 years from the termination of the business relationship or the execution of the transaction order

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
A) Data processing related to the provision of financial services				
A/2	**Provision of credit and cash loans**			
7.	providing for a more robust assessment of creditworthiness, and supporting the fulfilment of the conditions for responsible lending and reducing the credit risk, as well as the security of debtors and reference data providers through the Central Credit Information System	compliance with legal obligation (CCIS Act)	name, name at birth, place and date of birth, mother's birth name, number of personal identity card (passport), or the number of any another document suitable for verifying identity under the Act on Personal Data, address of residence, mailing address, e-mail address, contract data defined in the CCIS	the term specified in the CCIS Act (10 years in case of termination of contractual relationship or failed repayment, or, if the debt has been settled, 1 year following settlement, or 5 years, in case of fraud)
8.	in the context of the preliminary risk assessment required for the conclusion of the contract, the receipt of the data specified in the CCIS Act from the financial firm managing the CCIS.	consent (As per the CCIS Act)	name, name at birth, place and date of birth, mother's birth name, number of personal identity card (passport), or the number of any another document suitable for verifying identity under the Act on Personal Data, address of residence, mailing address, e-mail address, contract data defined in the CCIS	withdrawal of consent or termination of the contractual relationship
9.	verifying the authenticity and appropriateness of the personal data provided through the GIRinfO system	consent	name, address of residence, mother's name, number of identification document, photograph, signature	withdrawal of consent / contract limitation period
10.	fulfilment of the obligation to retain accounting documents	compliance with legal obligation (Accounting Act)	data in the accounting document	8 years
11.	non-postal liaison	consent	e-mail address, phone number	withdrawal of consent / contract limitation period
12.	verification of the consistency, authenticity and integrity of the sale and purchase agreement submitted electronically to the real estate registration authority and the document submitted to the Bank, as well as compliance with related document verification requirements	the Bank's legitimate interest	Personal data contained in the sale and purchase agreement; Personal data of other natural persons involved in the transaction, as set out in the sale and purchase agreement, in particular sellers, authorised representatives and witnesses; Data relating to the property that is the subject of the sale and purchase transaction (in particular the address, cadastral/land registry number, type of property, construction method and purchase price); In the case of electronic submission to the land registry authority, personal data and property-related data contained in documents evidencing submission via the e-Papír service, including in particular the e-Papír confirmation and the electronic file (electronic case file).	8 years from the termination of the business relationship or the execution of the transaction order
Based on the Bank's legitimate interest, the Bank processes the data of customers relating to foreign currency-denominated loan and credit agreements for an additional period of five years beyond the retention period prescribed by Act C of 2000 on Accounting, for the purposes of ensuring the proper management of potential legal disputes, the enforcement of legal claims, and the performance of related settlements and reconciliations.				

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
A) Data processing related to the provision of financial services				
A/3	**Financial administration of special schemes (e.g. state-subsidised loans, employer loans)**			
1.	conclusion or performance of credit or loan contract	performance of contract	name, signature, name at birth, mother's birth name, place and date of birth, nationality, address of residence, mailing address, personal identification number, sex, marital status, legal status for currency purposes, fact of legal capacity, number of personal identity card (passport), number of other identification appropriate for identifying a person under the Act on Personal Data, in the case of foreign nationals the address of residence in Hungary; highest level of schooling, employer, position, income; sector of employment, (previous) employment relationship, term and type of entrepreneurship, participation in any undertaking from which income is derived, date of occupation of current residence; number of persons in the household, number of children under 14 in the household; net monthly income of partner or spouse, unconfirmed net monthly income, monthly spending, other (securities, cash, deposits); names and positions of authorised representatives of legal persons and entities lacking the status of a legal person, identification data, as specified in the foregoing, of the agent for service of process and collateral provider, if a natural person, and those of other natural persons involved in the credit assessment	8 years following the date on which the relevant contract ends (however arising) (Accounting Act), or a failed contract conclusion, the time that the claim related to the failed contract conclusion becomes enforceable
2.	Credit or loan application / contracting with biometric signature	consent	in case of application / contracting with biometric signature, the biometric data made available to the Bank with the signature on the sign pad	withdrawal of consent, or 8 years following the date on which the relevant contract ends (however arising)
3.	identification of customer in relation to a credit or loan agreement	compliance with legal obligation (article 7 of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, mother's birth name, address of residence, or (in the absence of such) temporary residence, type and number of identification document, politically exposed person status, source of funds and assets in the case of politically exposed person	8 years from the termination of the business relationship or the execution of the transaction order
4.	identification of beneficial owner in relation to a credit or loan agreement	compliance with legal obligation (article 8 (2) of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, address of residence, or (in the absence of such) temporary residence, politically exposed person status	8 years from the termination of the business relationship or the execution of the transaction order
5.	Other business relationship information recorded in connection with the "Know your Customer" process	compliance with legal obligation (article 10 (1) of AML Act)	Type, duration and subject of the contract, level of risk of the client, circumstances of performance, other information on the purpose and intended nature of the business relationship	8 years from the termination of the business relationship or the execution of the transaction order

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
A) Data processing related to the provision of financial services				
A/3	**Financial administration of special schemes (e.g. state-subsidised loans, employer loans)**			
6.	providing for a more robust assessment of creditworthiness, and supporting the fulfilment of the conditions for responsible lending and reducing the credit risk, as well as the security of debtors and reference data providers through the Central Credit Information System	compliance with legal obligation (CCIS Act)	name, name at birth, place and date of birth, mother's birth name, number of personal identity card (passport), or the number of any another document suitable for verifying identity under the Act on Personal Data, address of residence, mailing address, e-mail address, contract data defined in the CCIS	the term specified in the CCIS Act (10 years in case of termination of contractual relationship or failed repayment, or, if the debt has been settled, 1 year following settlement, or 5 years, in case of fraud)
7.	in the context of the preliminary risk assessment required for the conclusion of the contract, the receipt of the data specified in the CCIS Act from the financial firm managing the CCIS	consent (as per the CCIS Act)	name, name at birth, place and date of birth, mother's birth name, number of personal identity card (passport), or the number of any another document suitable for verifying identity under the Act on Personal Data, address of residence, mailing address, e-mail address, contract data defined in the CCIS	withdrawal of consent or termination of the contractual relationship
8.	fulfilment of the obligation to retain accounting documents	compliance with legal obligation (Accounting Act)	data in the accounting document	8 years
9.	establishing entitlement to family housing allowance, and checking lawfulness of use	consent	the data determined in Government Decree 16/2016. (II. 10.) on housing-purpose state subsidies for the construction and purchase of new homes, and Government Decree No. 17/2016 (II. 10.) on the Family Housing Allowance for the Resale or Extension of Used Homes	until withdrawal of consent, or period required for establishing entitlement to family housing allowance, and checking lawfulness of use
10.	examination of the tax-free nature of the employer's housing allowance, issue of a certificate of disbursement of the employer's housing allowance	consent	name, name at birth, place and date of birth, mother's birth name, tax ID number, the data defined in Decree 15/2014 (IV.3.) of the Ministry for National Economy on the rules of payment of tax free employer housing subsidy	withdrawal of consent or termination of the contractual relationship
11.	When applying for CSOK Plusz loan, determining eligibility for interest subsidies and concluding the contract under the 518/2023. (XI. 30.) Government Decree	compliance with legal obligation (518/2023. (XI. 30. Government Decree)	In addition to the information provided in points A/2 1, 2, 3 and 4, the data required under Section 15. § (5) a) and the documents supporting them, in particular including the child's name, name at birth, address, notification address, mother's name at birth, place and date of birth, personal identification number, nationality, tax identification number, child's legal status, number of existing, dependent and adopted children, including the number of children over 12 weeks of gestation, and the expected date of birth of the adopted children, if any;	8 years from the termination of the business relationship or the execution of the transaction order

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
A) Data processing related to the provision of financial services				
A/3	**Financial administration of special schemes (e.g. state-subsidised loans, employer loans)**			
12.	examination of the request for the suspension of the repayment of the CSOK Plus loan, fulfilment of the request	compliance with legal obligation (518/2023. (XI. 30. Government Decree)	Natural person identification data; address, notification address; loan agreement number; natural person identification data and legal status of child(ren); address of child(ren); tax identification number of child(ren); adoption data; Documents to be attached to the request for suspension of repayment and the data processed by the Bank in them: The data used are: the date of the 12th week of pregnancy, the expected date of delivery, the number of foetuses, the data necessary to identify the person issuing the document, the date of presentation, the consent of the applicant to the processing of these data, the transfer of these data to specific public bodies. (ii) In the case of a blood child: birth certificate, on the basis of which the following data are processed: name, mother's name, place and date of birth, , and the data processed are those on the address page of the address card and the tax card. (iii) In the case of an adopted child: the final decision of the guardianship authority authorising the adoption, on the basis of which the following data are processed: identification data, the fact and date of presentation, the date on which the adoption decision became final, the name and file number of the guardianship authority authorising the adoption, the name, place and date of birth of the child, the name of the mother, the place and date of birth, and the data on the address page of the address card. (iv) A declaration of joint and several residence in the same household under criminal law. (v) In the case of death of the foetus, with certificate: personal data of the person requesting the certificate, date of death of the foetus and data, signature and stamp of the issuing obstetrician-gynaecologist. (vi) In the case of stillbirth of a foetus, the procedure for the examination of the deceased and the procedure for the dead pursuant to Decree 351/2013 (X.4 .) Government Decree No 3. ("Certificate of late fetal death"): The name, place and date of birth of the person using the certificate, the date of delivery of the stillborn foetus or the date of termination of the pregnancy, a certificate stating the week of pregnancy in which the person using the certificate gave birth to a stillborn foetus or the week of termination of the pregnancy, a certificate stating that a twin birth has taken place, the number of foetuses and the number of foetuses born alive and stillborn, the place and date of issue, the name of the establishment and the particulars necessary for identifying the person issuing the certificate. (vii) In the case of death of a live-born child, a death certificate, indicating the following data processed: name, name at birth, place and date of birth, name of mother, date of death.	8 years from the termination of the business relationship or the execution of the transaction order
13.	In the case of a CSOK Plusz loan examination of the application for childbirth grant, fulfilment of the conditions of the application and conclusion of the contract	performance of contract/ Explicit consent for sensitive personal data In relation to the information contained in the application:compliance with legal obligation (518/2023. (XI. 30. Government Decree)	Natural person identification; address, notification address; loan agreement number; natural person identification and legal status of child(ren); address of child(ren); tax identification number of child(ren) Documents to be attached to the application for assistance and the data processed by the Bank therein: identical to the above documents and data to be attached to the application for suspension of repayment	8 years from the termination of the business relationship or the execution of the transaction order

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
A) Data processing related to the provision of financial services				
A/3	**Financial administration of special schemes (e.g. state-subsidised loans, employer loans)**			
14.	Verification of the consistency, authenticity and integrity of the sale and purchase agreement submitted electronically to the real estate registration authority and the document submitted to the Bank, as well as the fulfilment of eligibility and document verification obligations related to the state-supported loan facility (CSOK Plus, the subsidised home creation loan programme for families).	compliane with legal obligation (Sections 22(2)-(3) and 28(8) of Government Decree No. 518/2023 (XI. 30.))	Personal data contained in the sale and purchase agreement; Personal data of other natural persons involved in the transaction and specified in the sale and purchase agreement, in particular sellers, authorised representatives and witnesses; Data relating to the property that is the subject of the sale and purchase transaction, in particular the address, cadastral (land registry) number, type of property, construction method and purchase price; In the case of electronic submission to the land registry authority, personal data and property-related data contained in the documents evidencing submission via the e-Papír service, including, in particular, the e-Papír confirmation and the electronic case file.	8 years from the termination of the business relationship or the execution of the transaction order
15.	Verification of the consistency, authenticity and integrity of the sale and purchase agreement submitted electronically to the real estate registration authority and the document submitted to the Bank, as well as the fulfilment of eligibility and document verification obligations related to the state-supported loan facility (Otthon Start Program).	Compliance with legal obligation (Article 8(2) (aa) and Sections 12(2)-(3) of Government Decree No. 227/2025 (VII. 31.))	Personal data contained in the sale and purchase agreement; In the case of electronic submission to the land registry authority, personal data contained in documents evidencing submission via the e-Papír service, including, in particular, the e-Papír confirmation and the electronic case file.	8 years from the termination of the business relationship or the execution of the transaction order
16.	fulfilment of the obligation to retain accounting documents	compliance with legal obligation (Accounting Act)	data in the accounting document	8 years
17.	non-postal liaison	consent	e-mail address, phone number	withdrawal of consent / contract limitation period

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
A) Data processing related to the provision of financial services				
A/4	**Taking deposits and receiving other repayable funds from the public, in excess of equity**			
1.	conclusion or performance of contract related to placement of deposits and other repayable funds	performance of contract	name, name at birth, mother's birth name, place and date of birth, nationality, address of residence, mailing address, number of personal identity card (passport), number of other identification appropriate for identifying a person under the Act on Personal Data, in the absence of an address of residence the address of temporary residence; politically exposed person status; names and positions of authorised representatives of legal persons and entities lacking the status of a legal person, identification data of the natural person agent for service of process; personal data of the beneficiary relevant to the nature of the investment service, as specified in the foregoing	8 years following the date on which the relevant contract ends (however arising) (Accounting Act)
2.	conclusion or performance of contract related to placement of deposits and other repayable funds with biometric signature	consent	in case of application / contracting with biometric signature, the biometric data made available to the Bank with the signature on the sign pad	withdrawal of consent / 8 years following the date on which the relevant contract ends (however arising) (Accounting Act)
3.	customer's identification in relation to a contract related to placement of deposits and other repayable funds	compliance with legal obligation (article 7 of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, mother's birth name, address of residence, or (in the absence of such) temporary residence, type and number of identification document, politically exposed person status, source of funds and assets in the case of politically exposed person	8 years from the termination of the business relationship or the execution of the transaction order
4.	beneficiary owner's identification in relation to a contract related to placement of deposits and other repayable funds	compliance with legal obligation (article 8 (2) of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, address of residence, or (in the absence of such) temporary residence, politically exposed person status	8 years from the termination of the business relationship or the execution of the transaction order
5.	Other business relationship information recorded in connection with the "Know your Customer" process	compliance with legal obligation (article 10 (1) of AML Act)	Type, duration and subject of the contract, level of risk of the client, circumstances of performance, other information on the purpose and intended nature of the business relationship	8 years from the termination of the business relationship or the execution of the transaction order
6.	fulfilment of the obligation to retain accounting documents	compliance with legal obligation (Accounting Act)	data in the accounting document	8 years
7.	non-postal liaison	consent	e-mail address	withdrawal of consent / contract limitation period

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
A) Data processing related to the provision of financial services				
A/5	**Provision of payment services**			
1.	conclusion or performance of contract for provision of payment services	performance of contract	name (e.g. cardholder's name, name on the card, in relation to cash withdrawal / deposit the name of the person performing the transaction, names of clients, beneficiaries and collectors of transfers and collections), name at birth, mother's name, place and date of birth, type and number of personal identification document, social security ID number, nationality, permanent address, mailing address, marital status, personal identification data, as listed above, of persons living at the same permanent address of residence, address card number, name(s) of the owner(s) of POS/VPOS/SOFTPOS trading organisations, natural person trader's name; name, position, contact data (phone, e-mail, URL) of contact persons in the retail premises, data (e.g. card number, expiry) required for executing card transactions (e.g. authorisation); account number of clients, beneficiaries and collectors of transfers and collections, personal data indicated in the notes or authorisation letters, in the case of bill-of-exchange collection, the personal data indicated on the bill of exchange	8 years following the date on which the relevant contract ends (however arising) (Accounting Act)
2.	conclusion or performance of contract for provision of payment services	the Bank's legitimate interest	place of work (employer), organisational unit, position, start of employment, mobil phone	loss of purpose/ interest, or successful objection
3.	conclusion or performance of contract for provision of payment services with biometric signature	consent	in case of application / contracting with biometric signature, the biometric data made available to the Bank with the signature on the sign pad	withdrawal of consent / 8 years following the date on which the relevant contract ends (however arising) (Accounting Act)
4.	conclusion or performance of contract for provision of payment services	compliance with legal obligation (Taxation Act, Personal Income Tax Act)	Tax ID number	contract limitation period / until the expiry of the right to tax determination
5.	customer identification related to contracts for provision of payment services	compliance with legal obligation (article 7 of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, mother's birth name, address of residence, or (in the absence of such) temporary residence, type and number of identification document, politically exposed person status, photo and video recording produced during the online identification (video call), source of funds and assets in the case of politically exposed person	8 years from the termination of the business relationship or the execution of the transaction order
6.	beneficial owner's identification related to contracts for provision of payment services	compliance with legal obligation (article 8 (2) of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, address of residence, or (in the absence of such) temporary residence, politically exposed person status	8 years from the termination of the business relationship or the execution of the transaction order
7.	Other business relationship information recorded in connection with the "Know your Customer" process	compliance with legal obligation (article 10 (1) of AML Act)	Type, duration and subject of the contract, level of risk of the client, circumstances of performance, other information on the purpose and intended nature of the business relationship	8 years from the termination of the business relationship or the execution of the transaction order

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
A) Data processing related to the provision of financial services				
A/5	**Provision of payment services**			
8.	Ensuring withdrawal of cash, free of any fee or charge, by means of cash-substitute payment instruments, from an automated teller machine located in Hungary	performance of contract	name, name at birth, place and date of birth, mother's birth name, payment account number	8 years following the date on which the relevant contract ends (however arising) (Accounting Act)
9.	fulfilment of the obligation to retain accounting documents	compliance with legal obligation (Accounting Act)	data in the accounting document	8 years
10.	non-postal liaison	consent	e-mail address, phone number	withdrawal of consent / contract limitation period
11.	Data transmit to Third-Party Provider (TPP)	performance of a contract	Account information (account details, balance, transactions), payment order details	Revocation of authorization to a Third Party Provider or termination of performance of contract for provision of payment services
12.	Conducting chargeback, dispute and pre-arbitration proceedings; investigating, asserting and defending the legitimacy of transactions, the performance of services, and claims or disputed matters affecting the Bank or the merchant; as well as processing and transmitting the information and documentation necessary for such purposes to the participants involved in the dispute resolution process (including Visa and MasterCard).	The Bank's legitimate interest in investigating complaints related to payment card transactions, resolving disputed claims, and protecting the rights, claims and legitimate interests of the Bank and its contractual partners.	Personal data, documents, statements, correspondence, agreements, invoices, receipts and other evidence used to substantiate the legitimacy of the transaction, the performance of the service or the investigation of the complaint, as well as any personal data contained therein.	5 years from the closure of the legal dispute, complaint or chargeback procedure, or from the date on which any related claims become time-barred.
13.	Processing and transmission of special categories of personal data, where necessary for the assessment of a claim or legal dispute, in the course of chargeback, dispute or pre-arbitration proceedings, to the participants involved in the dispute resolution process (including Visa and MasterCard).	The Bank's legitimate interest in investigating complaints related to payment card transactions, resolving disputed claims, and protecting the rights, claims and legitimate interests of the Bank and its contractual partners; and, with respect to special categories of personal data, processing necessary for the establishment, exercise or defence of legal claims pursuant to Article 9(2)(f) of the GDPR.	Special categories of personal data submitted in connection with the disputed transaction or service and necessary for the assessment of the dispute, in particular health data, expert opinions, medical records, statements, as well as any personal data contained therein.	5 years from the closure of the legal dispute, complaint or chargeback procedure, or from the date on which any related claims become time-barred.

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
A) Data processing related to the provision of financial services				
A/6	**Commercial activities in foreign currency, foreign exchange, other than currency exchange services, bills of exchange and cheques on own account or as commission agents**			
1.	trading in foreign currency, foreign exchange (other than currency exchange services)	performance of contract	name, address and account number of the natural-person beneficiary	8 years following the date on which the relevant contract ends (however arising) (Accounting Act)
2.	trading in bills of exchange	performance of contract	name, address and account number of the natural-person beneficiary	8 years following the date on which the relevant contract ends (however arising) (Accounting Act)
3.	trading in cheques	performance of contract	name, address and account number of the natural-person beneficiary, cheque data	8 years following the date on which the relevant contract ends (however arising) (Accounting Act)
4.	customer identification in relation to trading in foreign currency, foreign exchange (other than currency exchange services) bills of exchange and cheques on own account or as commission agents	compliance with legal obligation (article 7 of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, mother's birth name, address of residence, or (in the absence of such) temporary residence, type and number of identification document, politically exposed person status, source of funds and assets in the case of politically exposed person	8 years from the termination of the business relationship or the execution of the transaction order
5.	beneficial owner's identification related to relation to trading in foreign currency, foreign exchange (other than currency exchange services) bills of exchange and cheques on own account or as commission agents	compliance with legal obligation (article 8 (2) of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, address of residence, or (in the absence of such) temporary residence, politically exposed person status	8 years from the termination of the business relationship or the execution of the transaction order
6.	Other business relationship information recorded in connection with the "Know your Customer" process	compliance with legal obligation (article 10 (1) of AML Act)	Type, duration and subject of the contract, level of risk of the client, circumstances of performance, other information on the purpose and intended nature of the business relationship	8 years from the termination of the business relationship or the execution of the transaction order
7.	fulfilment of the obligation to retain accounting documents	compliance with legal obligation (Accounting Act)	data in the accounting document	8 years

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
A) Data processing related to the provision of financial services				
A/7	**Provision of sureties and bank guarantees, or the assumption of other bankers' obligations.**			
1.	conclusion or performance of contract for provision of sureties and bank guarantees, or the assumption of other bankers' obligations	performance of the contract	name, name at birth, place and date of birth, number and type of personal identification document, passport number, address of residence	8 years following the date on which the relevant contract ends (however arising) (Accounting Act), or a failed contract conclusion, the time that the claim related to the failed contract conclusion becomes enforceable
2.	customer identification related to a contract for provision of sureties and bank guarantees, or the assumption of other bankers' obligations	compliance with legal obligation (article 7 of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, mother's birth name, address of residence, or (in the absence of such) temporary residence, type and number of identification document, politically exposed person status, source of funds and assets in the case of politically exposed person	8 years from the termination of the business relationship or the execution of the transaction order
3.	beneficial owner's identification related to a contract for provision of sureties and bank guarantees, or the assumption of other bankers' obligations	compliance with legal obligation (article 8 (2) of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, address of residence, or (in the absence of such) temporary residence, politically exposed person status	8 years from the termination of the business relationship or the execution of the transaction order
4.	Other business relationship information recorded in connection with the "Know your Customer" process	compliance with legal obligation (article 10 (1) of AML Act)	Type, duration and subject of the contract, level of risk of the client, circumstances of performance, other information on the purpose and intended nature of the business relationship	8 years from the termination of the business relationship or the execution of the transaction order
5.	fulfilment of the obligation to retain accounting documents	compliance with legal obligation (Accounting Act)	data in the accounting document	8 years

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
A) Data processing related to the provision of financial services				
A/8	**Provision of safe custody service and safe deposit box service**			
1.	conclusion or performance of contract for provision of safe custody services	performance of contract	name, name at birth, place and date of birth, mother's birth name, address of residence, telephone number, number and type of personal identification document, mailing address, names and positions of the natural-person authorised representatives and contacts of legal persons and entities lacking the status of a legal person.	8 years following the date on which the relevant contract ends (however arising) (Accounting Act)
2.	conclusion of contract for provision of safe custody services with biometric signature	consent	in case of application / contracting with biometric signature, the biometric data made available to the Bank with the signature on the sign pad	withdrawal of consent / 8 years following the date on which the relevant contract ends (however arising) (Accounting Act)
3.	customer identification related to contracts for provision of safe custody service	compliance with legal obligation (article 7 of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, mother's birth name, address of residence, or (in the absence of such) temporary residence, type and number of identification document, politically exposed person status, source of funds and assets in the case of politically exposed person	8 years from the termination of the business relationship or the execution of the transaction order
4.	beneficial owner's identification related to contracts for provision of safe custody service	compliance with legal obligation (article 8 (2) of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, address of residence, or (in the absence of such) temporary residence, politically exposed person status	8 years from the termination of the business relationship or the execution of the transaction order
5.	Other business relationship information recorded in connection with the "Know your Customer" process	compliance with legal obligation (article 10 (1) of AML Act)	Type, duration and subject of the contract, level of risk of the client, circumstances of performance, other information on the purpose and intended nature of the business relationship	8 years from the termination of the business relationship or the execution of the transaction order
6.	conclusion or performance of contract for provision of safety deposit box services	performance of contract	name, name at birth, place and date of birth, mother's birth name, address of residence, number and type of personal identification document, mailing address, names and positions of the natural-person authorised representatives and contacts of legal persons and entities lacking the status of a legal person	8 years following the date on which the relevant contract ends (however arising) (Accounting Act)
7.	conclusion of contract for provision of safety deposit box services with biometric signature	consent	in case of application / contracting with biometric signature, the biometric data made available to the Bank with the signature on the sign pad	withdrawal of consent / 8 years following the date on which the relevant contract ends (however arising) (Accounting Act)
8.	customer identification related to contracts for provision of safety deposit box service	compliance with legal obligation (article 7 of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, mother's birth name, address of residence, or (in the absence of such) temporary residence, type and number of identification document, politically exposed person status, source of funds and assets in the case of politically exposed person	8 years from the termination of the business relationship or the execution of the transaction order
9.	beneficial owner's identification related to contracts for provision of safety deposit box service	compliance with legal obligation (article 8 (2) of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, address of residence, or (in the absence of such) temporary residence, politically exposed person status	8 years from the termination of the business relationship or the execution of the transaction order

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
A) Data processing related to the provision of financial services				
A/8	**Provision of safe custody service and safe deposit box service**			
10.	Other business relationship information recorded in connection with the "Know your Customer" process	compliance with legal obligation (article 10 (1) of AML Act)	Type, duration and subject of the contract, level of risk of the client, circumstances of performance, other information on the purpose and intended nature of the business relationship	8 years from the termination of the business relationship or the execution of the transaction order
11.	fulfilment of the obligation to retain accounting documents	compliance with legal obligation (Accounting Act)	data in the accounting document	8 years
12.	non-postal liaison	consent	e-mail address, phone number	withdrawal of consent / contract limitation period

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
A) Data processing related to the provision of financial services				
A/9	**The issuance of paper-based cash substitute payment instruments (e.g. paper-based traveller's cheques, bills of exchange) or the provision of services related thereto that are not classified as payment services**			
1.	conclusion or performance of contract related to the issuance of paper-based cash substitute payment instruments (e.g. paper-based traveller's cheques, bills of exchange) or the provision of services related thereto that are not classified as payment services	performance of contract	client's name, address, account number; natural-person beneficary's name, address, account number; cheque data; in the case of a cheque contract, the names and positions of the natural-person authorised representatives and contacts of legal persons and entities lacking the status of a legal person	8 years following the date on which the relevant contract ends (however arising) (Accounting Act), or a failed contract conclusion, the time that the claim related to the failed contract conclusion becomes enforceable
2.	customer identification related to the issuance of paper-based cash substitute payment instruments (e.g. paper-based traveller's cheques, bills of exchange) or the provision of services related thereto that are not classified as payment services	compliance with legal obligation (article 7 of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, mother's birth name, address of residence, or (in the absence of such) temporary residence, type and number of identification document, politically exposed person status, source of funds and assets in the case of politically exposed person	8 years from the termination of the business relationship or the execution of the transaction order
3.	beneficial owner related to the issuance of paper-based cash substitute payment instruments (e.g. paper-based traveller's cheques, bills of exchange) or the provision of services related thereto that are not classified as payment services	compliance with legal obligation (article 8 (2) of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, address of residence, or (in the absence of such) temporary residence, politically exposed person status	8 years from the termination of the business relationship or the execution of the transaction order
4.	Other business relationship information recorded in connection with the "Know your Customer" process	compliance with legal obligation (article 10 (1) of AML Act)	Type, duration and subject of the contract, level of risk of the client, circumstances of performance, other information on the purpose and intended nature of the business relationship	8 years from the termination of the business relationship or the execution of the transaction order
5.	fulfilment of the obligation to retain accounting documents	compliance with legal obligation (Accounting Act)	data in the accounting document	8 years
6.	non-postal liaison	consent	e-mail address, phone number	withdrawal of consent / contract limitation period

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
A) Data processing related to the provision of financial services				
A/10	**Intermediation of financial services, and intermediation of insurance under the terms provided for in the Act on Insurance Companies and the Insurance Business**			
1.	intermediation of financial services	performance of contract	name, name at birth, mother's birth name, place and date of birth, nationality, address of residence, mailing address, number of personal identity card (passport), number of other identification appropriate for identifying a person under the Act on Personal Data, sex, employment, in the the case of a foreign national the address of residence in Hungary; names and positions of authorised representatives of legal persons and entities lacking the status of a legal person, identification data, as specified in the foregoing, of the agent for service of process and collateral provider and other natural persons involved in the credit assessment	8 years following the date on which the relevant contract ends (however arising) (Accounting Act)
2.	conclusion of contract related to intermediation of financial services with biometric signature	consent	in case of application / contracting with biometric signature, the biometric data made available to the Bank with the signature on the sign pad	withdrawal of consent / 8 years following the date on which the relevant contract ends (however arising)
3.	intermediation of financial services	compliance with legal obligation (Taxation Act, Personal Income Tax Act)	Tax ID number	contract limitation period / until the expiry of the right to tax determination
4.	customer identification related to the intermediation of financial services	compliance with legal obligation (article 7 of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, mother's birth name, address of residence, or (in the absence of such) temporary residence, type and number of identification document, politically exposed person status, source of funds and assets in the case of politically exposed person	8 years from the termination of the business relationship or the execution of the transaction order
5.	beneficial owner identification related to the intermediation of financial services	compliance with legal obligation (article 8 (2) of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, address of residence, or (in the absence of such) temporary residence, politically exposed person status	8 years from the termination of the business relationship or the execution of the transaction order
6.	Other business relationship information recorded in connection with the "Know your Customer" process	compliance with legal obligation (article 10 (1) of AML Act)	Type, duration and subject of the contract, level of risk of the client, circumstances of performance, other information on the purpose and intended nature of the business relationship	8 years from the termination of the business relationship or the execution of the transaction order
7.	intermediation of insurance services	performance of contract	name, name at birth, mother's birth name, place and date of birth, nationality, address of residence, mailing address, number of personal identity card (passport), number of other identification appropriate for identifying a person under the Act on Personal Data, sex, employment, in the the case of a foreign national the address of residence in Hungary; names and positions of authorised representatives of legal persons and entities lacking the status of a legal person, identification data, as specified in the foregoing, of the agent for service of process and collateral provider and other natural persons involved in the credit assessment	the contract's limitation period
8.	conclusion of contract related to intermediation of insurance services with biometric signature	consent	in case of application / contracting with biometric signature, the biometric data made available to the Bank with the signature on the sign pad	withdrawal of consent / 8 years following the date on which the relevant contract ends (however arising) (Accounting Act)
9.	intermediation of insurance	compliance with legal obligation (Taxation Act, Personal Income Tax Act)	Tax ID number	contract limitation period / until the expiry of the right to tax determination

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
A) Data processing related to the provision of financial services				
A/10	**Intermediation of financial services, and intermediation of insurance under the terms provided for in the Act on Insurance Companies and the Insurance Business**			
10.	customer identification related to intermediation of insurance	compliance with legal obligation (article 7 of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, mother's birth name, address of residence, or (in the absence of such) temporary residence, type and number of identification document, politically exposed person status, source of funds and assets in the case of politically exposed person	8 years from the termination of the business relationship or the execution of the transaction order
11.	beneficial owner identification related to intermediation of insurance	compliance with legal obligation (article 8 (2) of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, address of residence, or (in the absence of such) temporary residence, politically exposed person status	8 years from the termination of the business relationship or the execution of the transaction order
12.	Other business relationship information recorded in connection with the "Know your Customer" process	compliance with legal obligation (article 10 (1) of AML Act)	Type, duration and subject of the contract, level of risk of the client, circumstances of performance, other information on the purpose and intended nature of the business relationship	8 years from the termination of the business relationship or the execution of the transaction order
13.	fulfilment of the obligation to retain accounting documents	compliance with legal obligation (Accounting Act)	data in the accounting document	8 years
14.	non-postal liaison	consent	e-mail address, phone number	withdrawal of consent / contract limitation period

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
A) Data processing related to the provision of financial services				
A/11	**Credit pre-screening where initiated, information about credit options and contacting the inquirer about credit options and credit pre-screening using the contact details provided in the case of telephone inquiries**			
1.	execution of credit pre-screening initiated by the customer	consent	name, e-mail, telephone number, year of birth, address of residence, period of residence under the same address, marital status, highest level of schooling, number of adults/children living in the same household, expenditure data, information on outstanding loan	withdrawal of consent / 5 years from the closing
2.	information about credit options if requested by the customer by phone	consent	name, e-mail, telephone number, year of birth, address of residence, period of residence under the same address, marital status, highest level of schooling, number of adults/children living in the same household, expenditure data, information on outstanding loan	withdrawal of consent / 5 years from the closing
3.	liaison using the contact details provided by the inquirer, regarding credit options and credit pre-screening	consent	name, e-mail, telephone number, year of birth, address of residence, period of residence under the same address, marital status, highest level of schooling, number of adults/children living in the same household, expenditure data, information on outstanding loan	withdrawal of consent / 5 years from the closing

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
B) Provision of auxiliary financial services				
B/12	**Currency exchange activity**			
1.	conclusion or performance of contract for provision of auxiliary financial services	performance of contract	name, number and type of identification document, customer's legal status for currency purposes	8 years following the date on which the relevant contract ends (however arising) (Accounting Act)
2.	fulfilment of the obligation to retain accounting documents	compliance with legal obligation (Accounting Act)	data in the accounting document	8 years

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
C) Investment and auxiliary investment services, and other services provided by the Bank on a professional basis				
C/13	**Securities lending, nominee activities, investment services, services auxiliary to investment services, and intermediation and activities available to commodity dealers under Sections 111 to 116 of the Investment Services Act.**			
1.	conclusion or performance of contract for securities lending	performance of contract	name, name at birth, mother's birth name, place and date of birth, nationality, address of residence, mailing address, number of personal identity card (passport), number of other identification appropriate for identifying a person under the Act on Personal Data, in the absence of an address of residence the place of temporary residence, number of residence permit, legal status for currency purposes; names and positions of authorised representatives of legal persons and entities lacking the status of a legal person, identification data of the natural person agent for service of process	8 years following the date on which the relevant contract ends (however arising) (Accounting Act)
2.	conclusion or performance of contract for securities lending	the Bank's legitimate interest	employment, name and address of employer, income status	loss of purpose/interest, or successful objection
3.	conclusion or performance of contract for securities lending	compliance with legal obligation (Taxation Act, Personal Income Tax Act)	Tax ID number	contract limitation period / until the expiry of the right to tax determination
4.	customer identification related to contracts for securities lending	compliance with legal obligation (article 7 of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, mother's birth name, address of residence, or (in the absence of such) temporary residence, type and number of identification document, politically exposed person status, source of funds and assets in the case of politically exposed person	8 years from the termination of the business relationship or the execution of the transaction order
5.	beneficial owner identification related to contracts for securities lending	compliance with legal obligation (article 8 (2) of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, address of residence, or (in the absence of such) temporary residence, politically exposed person status	8 years from the termination of the business relationship or the execution of the transaction order
6.	Other business relationship information recorded in connection with the "Know your Customer" process	compliance with legal obligation (article 10 (1) of AML Act)	Type, duration and subject of the contract, level of risk of the client, circumstances of performance, other information on the purpose and intended nature of the business relationship	8 years from the termination of the business relationship or the execution of the transaction order

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
C) Investment and auxiliary investment services, and other services provided by the Bank on a professional basis				
C/13	**Securities lending, nominee activities, investment services, services auxiliary to investment services, and intermediation and activities available to commodity dealers under Sections 111 to 116 of the Investment Services Act.**			
7.	conclusion or performance of contract for nominee activities	performance of contract	name, name at birth, mother's birth name, place and date of birth, nationality, address of residence, mailing address, number of personal identity card (passport), number of other identification appropriate for identifying a person under the Act on Personal Data, in the absence of an address of residence the place of temporary residence, number of residence permit, legal status for currency purposes; names and positions of authorised representatives of legal persons and entities lacking the status of a legal person, identification data of the natural person agent for service of process	8 years following the date on which the relevant contract ends (however arising) (Accounting Act)
8.	conclusion or performance of contract for nominee activities	the Bank's legitimate interest	employment, name and address of employer, income status	loss of purpose/interest, or successful objection
9.	conclusion or performance of contract for nominee activities	compliance with legal obligation (Taxation Act, Personal Income Tax Act)	Tax ID number	contract limitation period / until the expiry of the right to tax determination
10.	customer identification in relation to contracts for nominee activities	compliance with legal obligation (article 7 of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, mother's birth name, address of residence, or (in the absence of such) temporary residence, type and number of identification document, politically exposed person status, source of funds and assets in the case of politically exposed person	8 years from the termination of the business relationship or the execution of the transaction order
11.	beneficial owner's identification in relation to contracts for nominee activities	compliance with legal obligation (article 8 (2) of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, address of residence, or (in the absence of such) temporary residence, politically exposed person status	8 years from the termination of the business relationship or the execution of the transaction order
12	Other business relationship information recorded in connection with the "Know your Customer" process	compliance with legal obligation (article 10 (1) of AML Act)	Type, duration and subject of the contract, level of risk of the client, circumstances of performance, other information on the purpose and intended nature of the business relationship	8 years from the termination of the business relationship or the execution of the transaction order
13.	conclusion or performance of contract for provision of investment services	performance of contract	name, name at birth, mother's birth name, place and date of birth, nationality, address of residence, mailing address, number of personal identity card (passport), number of other identification appropriate for identifying a person under the Act on Personal Data, in the absence of an address of residence the place of temporary residence, number of residence permit, legal status for currency purposes; names and positions of authorised representatives of legal persons and entities lacking the status of a legal person, identification data of the natural person agent for service of process	8 years following the date on which the relevant contract ends (however arising) (Accounting Act)
14.	conclusion of contract for provision of investment services with biometric signature	consent	data on investment services agreement biometric data linked to the signature image on the signature pad in the case of biometric signature applications/contracts	withdrawal of consent / 8 years following the date on which the relevant contract ends (however arising) (Accounting Act)
15.	conclusion or performance of contract for provision of investment services	the Bank's legitimate interest	employment, name and address of employer, income status	loss of purpose/interest, or successful objection

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
C) Investment and auxiliary investment services, and other services provided by the Bank on a professional basis				
C/13	**Securities lending, nominee activities, investment services, services auxiliary to investment services, and intermediation and activities available to commodity dealers under Sections 111 to 116 of the Investment Services Act.**			
16.	conclusion or performance of contract for provision of investment services	compliance with legal obligation (Taxation Act, Personal Income Tax Act)	Tax ID number	contract limitation period / until the expiry of the right to tax determination
17.	customer identification related to contracts for provision of investment services	compliance with legal obligation (article 7 of AML Act)	absence of such) temporary residence, type and number of identification document, politically exposed person status, source of funds and assets in the case of politically exposed person	8 years from the termination of the business relationship or the execution of the transaction order
18.	beneficial owner identification related to contracts for provision of investment services	compliance with legal obligation (article 8 (2) of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, address of residence, or (in the absence of such) temporary residence, politically exposed person status	8 years from the termination of the business relationship or the execution of the transaction order
19.	Other business relationship information recorded in connection with the “Know your Customer” process	compliance with legal obligation (article 10 (1) of AML Act)	Type, duration and subject of the contract, level of risk of the client, circumstances of performance, other information on the purpose and intended nature of the business relationship	8 years from the termination of the business relationship or the execution of the transaction order
20	conclusion or performance of contract for provision of services auxiliary to investment services	performance of contract	name, name at birth, mother’s birth name, place and date of birth, nationality, address of residence, mailing address, number of personal identity card (passport), number of other identification appropriate for identifying a person under the Act on Personal Data, in the absence of an address of residence the place of temporary residence, number of residence permit, legal status for currency purposes; names and positions of authorised representatives of legal persons and entities lacking the status of a legal person, identification data of the natural person agent for service of process	8 years following the date on which the relevant contract ends (however arising) (Accounting Act)
21.	conclusion or performance of contract for provision of services auxiliary to investment services	the Bank’s legitimate interest	employment, name and address of employer, income status	loss of purpose/interest, or successful objection
22.	conclusion or performance of contract for provision of services auxiliary to investment services	compliance with legal obligation (Taxation Act, Personal Income Tax Act)	Tax ID number	contract limitation period / until the expiry of the right to tax determination
23.	customer identification related to contracts for provision of services auxiliary to investment services	compliance with legal obligation (article 7 of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, mother’s birth name, address of residence, or (in the absence of such) temporary residence, type and number of identification document, politically exposed person status, source of funds and assets in the case of politically exposed person	8 years from the termination of the business relationship or the execution of the transaction order
24.	beneficial owner identification related to contracts for provision of services auxiliary to investment services	compliance with legal obligation (article 8 (2) of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, address of residence, or (in the absence of such) temporary residence, politically exposed person status	8 years from the termination of the business relationship or the execution of the transaction order
25.	Other business relationship information recorded in connection with the “Know your Customer” process	compliance with legal obligation (article 10 (1) of AML Act)	Type, duration and subject of the contract, level of risk of the client, circumstances of performance, other information on the purpose and intended nature of the business relationship	8 years from the termination of the business relationship or the execution of the transaction order

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
C) Investment and auxiliary investment services, and other services provided by the Bank on a professional basis				
C/13	**Securities lending, nominee activities, investment services, services auxiliary to investment services, and intermediation and activities available to commodity dealers under Sections 111 to 116 of the Investment Services Act.**			
26.	conclusion or performance of contract for provision of services provided by the intermediary of an investment firm or commodity dealer	performance of contract	name, name at birth, mother's birth name, place and date of birth, nationality, address of residence, mailing address, number of personal identity card (passport), number of other identification appropriate for identifying a person under the Act on Personal Data, income status, in the absence of an address of residence the place of temporary residence, number of residence permit, legal status for currency purposes; names and positions of authorised representatives of legal persons and entities lacking the status of a legal person, identification data of the natural person agent for service of process	8 years following the date on which the relevant contract ends (however arising) (Accounting Act)
27.	conclusion or performance of contract for provision of services provided by the intermediary of an investment firm or commodity dealer	the Bank's legitimate interest	employment, name and address of employer, income status	loss of purpose/interest, or successful objection
28.	conclusion or performance of contract for provision of services provided by the intermediary of an investment firm or commodity dealer	compliance with legal obligation (Taxation Act, Personal Income Tax Act)	Tax ID number	contract limitation period / until the expiry of the right to tax determination
29.	customer identification related to a contract for provision of services provided by the intermediary of an investment firm or commodity dealer	compliance with legal obligation (article 7 of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, mother's birth name, address of residence, or (in the absence of such) temporary residence, type and number of identification document, politically exposed person status, source of funds and assets in the case of politically exposed person	8 years from the termination of the business relationship or the execution of the transaction order
30.	beneficial owner identification related to a contract for provision of services provided by the intermediary of an investment firm or commodity dealer	compliance with legal obligation (article 8 (2) of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, address of residence, or (in the absence of such) temporary residence, politically exposed person status	8 years from the termination of the business relationship or the execution of the transaction order
31.	Other business relationship information recorded in connection with the "Know your Customer" process	compliance with legal obligation (article 10 (1) of AML Act)	Type, duration and subject of the contract, level of risk of the client, circumstances of performance, other information on the purpose and intended nature of the business relationship	8 years from the termination of the business relationship or the execution of the transaction order
32.	conclusion or performance of contract for provision of services in the framework of activities available to commodity dealers	performance of contract	name, name at birth, mother's birth name, place and date of birth, nationality, address of residence, mailing address, number of personal identity card (passport), number of other identification appropriate for identifying a person under the Act on Personal Data, in the absence of an address of residence the place of temporary residence, number of residence permit, legal status for currency purposes; names and positions of authorised representatives of legal persons and entities lacking the status of a legal person, identification data of the natural person agent for service of process	8 years following the date on which the relevant contract ends (however arising) (Accounting Act)
33.	conclusion or performance of contract for provision of services in the framework of activities available to commodity dealers	the Bank's legitimate interest	employment, name and address of employer, income status	loss of purpose/interest, or successful objection

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
C) Investment and auxiliary investment services, and other services provided by the Bank on a professional basis				
C/13	**Securities lending, nominee activities, investment services, services auxiliary to investment services, and intermediation and activities available to commodity dealers under Sections 111 to 116 of the Investment Services Act.**			
34.	conclusion or performance of contract for provision of services in the framework of activities available to commodity dealers	compliance with legal obligation (Taxation Act, Personal Income Tax Act)	Tax ID number	contract limitation period / until the expiry of the right to tax determination
35.	customer identification related to a contract for provision of services in the framework of activities available to commodity dealers	compliance with legal obligation (article 7 of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, mother's birth name, address of residence, or (in the absence of such) temporary residence, type and number of identification document, politically exposed person status, source of funds and assets in the case of politically exposed person	8 years from the termination of the business relationship or the execution of the transaction order
36.	beneficiary owner's identification related to a contract for provision of services in the framework of activities available to commodity dealers	compliance with legal obligation (article 8 (2) of AML Act)	family name and first name, family name and first name of birth, nationality, place and date of birth, address of residence, or (in the absence of such) temporary residence, politically exposed person status	8 years from the termination of the business relationship or the execution of the transaction order
37.	Other business relationship information recorded in connection with the "Know your Customer" process	compliance with legal obligation (article 10 (1) of AML Act)	Type, duration and subject of the contract, level of risk of the client, circumstances of performance, other information on the purpose and intended nature of the business relationship	8 years from the termination of the business relationship or the execution of the transaction order
38.	fulfilment of the obligation to retain accounting documents	compliance with legal obligation (Accounting Act)	data in the accounting document	8 years
39.	non-postal liaison	consent	e-mail address, phone number	withdrawal of consent / contract limitation period
40.	MIFID aptitude test	Legal obligation (Bszt. 44–45. §)	Client's financial knowledge of securities, education, financial situation, risk-sensitivity responses, investment objectives	contract limitation period
41.	Monitoring trading activity to identify potentially abusive behaviour.	Legal obligation (Regulation (EU) No 596/2014)	Name of client, details of the order	The Bank shall keep the data relating to the notification, the investigation carried out in order to make the notification and the measures taken for a period of 5 years from the date of completion of the last investigative act or measure.

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
C) Investment and auxiliary investment services, and other services provided by the Bank on a professional basis				
C/14	**Enabling the account holder to gain information on the actual data of the securities account and the customer account on the website of the National Bank of Hungary**			
1.	providing information on the actual data of the securities account and the customer account on the website of the National Bank of Hungary	compliance with legal obligation (Investment Act)	entry identifier and password generated for securities account and customer account, securities account balance data, customer account balance data and other account data valid on the last day of the month concerned	5 years

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
D) Other processing cases				
D/15	**Market research, opinion polls, customer satisfaction surveys**			
1.	market research, opinion polls, customer satisfaction surveys	the Bank's legitimate interest	name, name at birth, mother's birth name, place and date of birth, nationality, address of residence, mailing address, number of personal identity card (passport), number of other identification appropriate for identifying a person under the Act on Personal Data, in the the case of a foreign national the address of residence in Hungary; names and positions of authorised representatives of legal persons and entities lacking the status of a legal person, identification data, as specified in the foregoing, of the agent for service of process, beneficiary's data, products and services used by the customer	loss of purpose/interest, or successful objection
2.	non-postal liaison	consent	e-mail address, phone number	withdrawal of consent / contract limitation period

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
D) Other processing cases				
D/16	**Direct marketing, data controlling for marketing purposes, communication with individuals who use specific channels to inquire about the Bank's products**			
1.	direct marketing, data controlling for marketing purposes, communication with individuals who use specific channels to inquire about the Bank's products	consent / the Bank's legitimate interest in the provision of financial services when transferring data pursuant to Section 164/B of the Hungarian Data Protection Act	name, name at birth, mother's birth name, place and date of birth, nationality, address of residence, mailing address, e-mail address, number of personal identity card (passport), number of other identification appropriate for identifying a person under the Act on Personal Data, in the the case of a foreign national the address of residence in Hungary; names and positions of authorised representatives of legal persons and entities lacking the status of a legal person, identification data, as specified in the foregoing, of the agent for service of process, beneficiary's data, products and services used by the customer In data processing for direct marketing purposes the bank performs profiling to form target groups.	withdrawal of consent, expiry of the term specified in the consent, loss of purpose/interest, or successful objection

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
D) Other processing cases				
D/17	**Customer relations, arrangements for events, ongoing efforts to maintain data accuracy, complaints management, receivables management, other operational customer services**			
1.	customer relations with natural person customer/ with business client	consent / the Bank's legitimate interest	name, name at birth, mother's birth name, place and date of birth, nationality, address of residence, mailing address, e-mail address, number of personal identity card (passport), number of other identification appropriate for identifying a person under the Act on Personal Data, in the the case of a foreign national the address of residence in Hungary; names and positions of authorised representatives of legal persons and entities lacking the status of a legal person, identification data, as specified in the foregoing, of the agent for service of process, beneficiary's data, products and services used by the customer	withdrawal of consent, loss of purpose/interest, or successful objection
2.	arrangements for events	consent	name, name at birth, mother's birth name, place and date of birth, nationality, address of residence, mailing address, e-mail address, number of personal identity card (passport), number of other identification appropriate for identifying a person under the Act on Personal Data, in the the case of a foreign national the address of residence in Hungary; names and positions of authorised representatives of legal persons and entities lacking the status of a legal person, identification data, as specified in the foregoing, of the agent for service of process, beneficiary's data, products and services used by the customer	withdrawal of consent
3.	complaint management (except for recording phone conversations related to the complaint)	compliance with legal obligation (Credit Institutions Act)	name, name at birth, mother's birth name, place and date of birth, nationality, address of residence, mailing address, e-mail address, number of personal identity card (passport), number of other identification appropriate for identifying a person under the Act on Personal Data, in the the case of a foreign national the address of residence in Hungary; names and positions of authorised representatives of legal persons and entities lacking the status of a legal person, identification data, as specified in the foregoing, of the agent for service of process, beneficiary's data, products and services used by the customer	5 years
4.	management of receivables related to the concluded contract (collection of receivables)	the Bank's legitimate interest	name, name at birth, mother's birth name, place and date of birth, nationality, address of residence, mailing address, number of personal identity card (passport), number of other identification appropriate for identifying a person under the Act on Personal Data, in the the case of a foreign national the address of residence in Hungary; names and positions of authorised representatives of legal persons and entities lacking the status of a legal person, identification data, as specified in the foregoing, of the agent for service of process, beneficiary's data, products and services used by the customer	loss of purpose/interest / successful objection
5.	non-postal liaison conducted for receivables-collection purposes (except for telephone conversations)	consent	telephone number, e-mail address	loss of purpose or withdrawal of consent
6.	fulfilment of the Bank's quality assurance objectives	consent	name, name at birth, mother's birth name, place and date of birth, nationality, address of residence, mailing address, number of personal identity card (passport), number of other identification appropriate for identifying a person under the Act on Personal Data, in the the case of a foreign national the address of residence in Hungary; names and positions of authorised representatives of legal persons and entities lacking the status of a legal person, identification data, as specified in the foregoing, of the agent for service of process, beneficiary's data, products and services used by the customer	loss of purpose or withdrawal of consent
7.	verifying the authenticity and appropriateness of the personal data provided, and, in line with Recommendation 14/2012. (XII.13.) of PSZÁF (Hungarian Financial Supervisory Authority), retrieving new address data through GIRinfO for establishing the liaison required in order to facilitate the debtor's performance or to avoid legal proceedings, or, if all this fails, to initiate a recovery process by means of legal proceedings	consent, the Bank's legitimate interest	name, address of residence, mailing address	withdrawal of consent / contract limitation period

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
D) Other processing cases				
D/18	**Performance of the Agreement between the Government of Hungary and the Government of the United States of America to Improve International Tax Compliance and to Implement the FATCA**			
1.	fulfilment of obligations under the FATCA	compliance with legal obligation (FATCA Act)	name, address, United States tax ID number, account number, account balance	5 years

D/19	Audio-recordings produced in the Bank's call center and other similar customer service / relevant sales areas operating on similar principles			
1.	audio-recording of phone conversation conducted in the context of complaint management	compliance with legal obligation (Credit Institutions Act)	time of audio-recording, time of call, caller's telephone number, minutes of audio-recording	5 years
2.	execution of an order submitted to the Bank, if the object of the telephone conversation is a specific order	performance of contract	time of audio-recording, time of call, caller's telephone number, transcript of the audio-recording, if any	8 years following the date on which the relevant contract ends (however arising) (Accounting Act)
3.	ensuring traceability of telephone conversations conducted with the customer (excluding complaints or specific orders), and fulfilment of the Bank's quality assurance objectives	consent	audio-recording, time of call, caller's telephone number, transcript minutes of the audio-recording, if any	loss of purpose or withdrawal of consent, but not more than 8 years
4.	in connection with collection of receivables ensuring traceability of telephone conversations conducted with the customer and fulfilment of the Bank's quality assurance objectives	the Bank's legitimate interest	audio-recording, time of call, caller's telephone number, called party's telephone number, transcript minutes of the audio-recording, if any	loss of purpose/interest / successful objection but not more than 8 years
5.	transcript of conversations with the AI assistant	the Bank's legitimate interest in the development and improvement of its AI assistant	transcripts of conversations, telephone numbers, and audio recording identifiers	successful objection but not more than 10 days

D/20	Monitoring, for property protection and security purposes, of entry to and exit from specific buildings and premises used by the Bank			
1.	personal, property, data security / protection	the Bank's legitimate interest	name, number of personal identification document, fact and time of passing checkpoints	in the the case of regular entry until termination of the entry authorisation, but not more than 6 months from the time of generation of the data in the case of casual entry, for 24 hours from departure / successful objection

	Purpose of processing	Legal basis for processing	Processed personal data	Duration of data processing (erasure of data)
D) Other processing cases				
D/21	**Production and retention of video recordings made, for the protection of confidential securities and business information, security, and the protection of human life and physical integrity, of natural persons intending to enter, for specific purposes, to the Bank's seat and establishments and other buildings used by the Bank as private areas open to the public**			
1.	protection of private but publicly used areas that are required for the fulfilment of the Bank's duties; personal, property and data security, protection	the Bank's legitimate interest	video-recording	60 days / successful objection

D/22	**Data controlling regarding to consumer clients of UniCredit Leasing Hungary Zrt.**			
1.	liaising with the clients of UniCredit Leasing Hungary Zrt. to make preliminary credit assessment and tailor-made loan offers	the Bank's legitimate interest	name, date and place of birth, mother's name, date of decision, net monthly income (HUF), monthly instalment of outstanding debt (HUF), new demand obligation, monthly household expenditure, education, profession, number of persons living in the household, number of dependents, employer's tax number / company registration number / KSH number, address, address type, current UniCredit Leasing delay (days, amount), maximum number of delayed days in the last 6/12 months, maximum overdue debt in the last 6/12 months, sold/written claim in the past 5 years, initial date of employment, sector of employment, date of occupation	loss of purpose/interest, or successful objection, but not more than 60 days of delivery of the data
2.	liaising with the clients of UniCredit Leasing Hungary Zrt. to make preliminary credit assessment and tailor-made loan offers	consent	telephone number, e-mail address	withdrawal of consent

IV. Data Transfer

The bank has the right to transfer data in relation to processing, based on the data subject's consent or to fulfil a legal obligation or a legitimate interest of the controller or a third party (recipients are other potential controllers outside the Bank), as follows:

Based on the data subject's voluntary consent:

- in the case of document verification and other retrieval, to the Central Office for Administrative and Electronic Public Services (1094 Budapest, Balázs Béla u. 35)
- in the case of income verification by the National Tax and Customs Administration (1054 Budapest, Széchenyi u. 2, www.nav.gov.hu) or by the employer
- to the Bank's Intermediary, in the reconciliation regarding the intermediation fee
- when digitizing a bank card into the Google Pay application via the UniCredit mBanking mobile application, the Bank transfers the following data to Google LLC: customer name, billing address, phone number, bank card number and expiry date.

Based on Articles 161–164 of the Credit Institutions Act on the release of bank secret and Articles 118–120 of the Investment Services Act on the release of securities secret:

- to the Bank's owner, UniCredit S.p.A. (20154 Milan, Italy, Piazza Gae Aulenti 3 – Tower A, www.unicreditgroup.eu), for purposes related to ownership control, to the fulfilment of the Bank's statutory tasks and obligations, to consolidation, risk analysis and sales of services, and to ensure compliance with requirements related to the consolidated supervision
- to UniCredit Bank Austria AG, as per Sections 5 and 6 of Annex 1 of the General Business Conditions on outsourced activities (hereinafter: Outsourcing Annex)
- to third parties, receivables managers engaged on receivables collection activities, in order to enforce the Bank's claims

Based on the legitimate interest in the economic activities of UniCredit's Hungarian subsidiaries pursuant to Section 164/B of the Hungarian Commercial Code:

- to UnCredit Leasing Hungary Zrt. (company registration number: 01 10 043137, registered office: 1054 Budapest, Szabadság tér 5–6.) the name of the private individual engaged in economic activity, the first 8 digits of the tax number, telephone number, postal address, email address of the individual customer, for the purpose of establishing a customer relationship.

Based on Article 5 (2) of the CCIS Act:

- to BISZ Zrt., when retrieving reference data from the CCIS or in the case of data transfer

Based on Article 142/A (2)-(3) of the Capital Market Act.

- to the National Bank of Hungary, in relation to the processing referred to in section I/C/14.

Pursuant to § 3 of Act LXVII of 2019 on the promotion of long-term shareholder engagement and the amendment of certain acts for the purpose of legal harmonisation:

- to the public limited-liability company or a third party designated by it, the details of the investment service contractor as set out in Table 2/C of the Annex to Regulation (EU) No 1212/2018

On the basis of Government Decree No. 518/2023 (XI. 30.) on the preferential CSOK Plus loan to support families in setting up a home:

- data subject to the obligation to provide data pursuant to Articles 53, 19, 37 (2) of the Government Decree; data referred to in Article 15 (5) of the Government Decree; data referred to in Article 15 (5) of the Government Decree
- Data subject to the obligation to provide data on the fulfilment of the obligation to have children; data under § 15 (5) of the Government Decree, fulfilment of the obligation to provide information under § 15 (10), § 19 (7) of the Government Decree, fulfilment of the obligation under § 27 (1), § 28 (6), § 33 (1), § 35 (4), § 36 (3), § 38 (1), § 50 (2) of the Government Decree.

V. Data processors

- in the case of retrieval from GIRinfO, to GIRO Zrt. (1054 Budapest, Vadász u. 31., info@mail.giro.hu, www.giro.hu)
- to the Bank's business partners contracted for purposes related to opinion polls, market research and direct marketing
- in the case of processing performed for property protection and security purposes (section I/D/D/21-22), Honeywell Szabályozástechnikai Kft. (1139 Budapest, Petneházy u 2-4. 3. em.), CRITERION Biztonsági Szolgáltatások Zrt. (1033 Budapest, Polgár u 8–10.)

The list of data processors and sub-processors acting as outsourcers pursuant to Section 68 of the Hungarian Data Protection Act is set out in Annex 1 to the General Business Conditions.