



PRIVACY NOTICE

DEPOSIT COLLECTION AND PAYMENT SERVICES

The purpose of this special notice (the “**Notice**”) is to provide transparent information, in plain language, on the processing of personal data collected by MKB Bank in connection with various account products and payment services and the circumstances of processing, in accordance with General Data Protection Regulation (EU) 2016/679 (“**GDPR**”).

Processing of personal data available for the Bank during the customer's use of account products and payment services is a necessary and indispensable precondition for the use of the products or services; a customer failing or refusing to supply such data cannot use the product or service concerned.

Please read the Notice carefully and be aware of the fact that it contains only the most important details relating to the specific data processing concerned. You have the right to review the complete detailed privacy notice (hereinafter: “**General Notice**”) as well, which you can access at www.mkb.hu/adatvedelmi-tajekoztatas.

DETAILS OF DATA CONTROLLER

Name of Data Controller

Registered office

Central contact details

Website

Company registration number

MKB Bank Nyrt.

(‘**Bank**’ or ‘**Controller**’)

H-1056 Budapest, Váci u. 38.

E-mail: ugyfelszolgalat@mkb.hu

Telephone: +36 (80) 350-350 (MKB TeleBANKár)

www.mkb.hu

01-10-040952

CONTACT DETAILS OF DATA PROTECTION OFFICER

Postal address

E-mail address

H-1134 Budapest, Kassák Lajos u. 16-18.

adatvedelem@mkb.hu

If you have any question to ask or any request or complaint to make regarding the protection of personal data or any request concerning the exercise of the right relating to the processing of personal data, feel free to contact MKB Bank Nyrt’s Data Protection Officer.



1. PURPOSE AND LEGAL BASIS OF PROCESSING PERSONAL DATA, THE PROCESSED DATA

The purposes of this specific data processing include, in particular:

- a) provision and use of the financial services specified in *Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises* (the "**Credit Institutions Act**");
- b) identification as specified in *Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing* (the „**AML Act**“);
- c) processing of the application for the product or service concerned – including the right to verify the data; communication with the person/customer affected by data processing;
- d) preparation of the contract relating to the product or service concerned;
- e) conclusion of the contract if the necessary conditions are met; and
- f) mutual performance and exercising of the obligations and rights relating to the use of the product and service concerned.

The data processed include data specified by the data subject during the conclusion of the contract, other data generated in the course of the use of the service that can be associated with the data subject, along with conclusions that can be drawn from them.

Information on the processed data and the legal bases of the processing of data for the various purposes of processing are contained in Appendix 1 to the Notice.

2. DURATION OF DATA PROCESSING (RETENTION PERIOD)

For general information on the duration of the processing carried out by the Bank, see Section 5 of the General Privacy Notice.

The retention periods pertaining to this special data processing are specified in Appendix 1 to the Notice.

3. WHO CAN ACCESS, WITH WHOM DO WE SHARE THE PERSONAL DATA OF THE DATA SUBJECTS

The Bank's employees can access the data for the purposes of the performance of their tasks and to the extent strictly necessary, on a need-to-know basis.

The data so processed may be transferred to other persons ('**Recipients**'). Recipients may include public authorities, other authorities or other bodies performing public duties as well as courts to which personal data have to be disclosed in order to fulfil statutory obligations [Article 6 (1) c) of the GDPR – 'Legal Basis'].

For further details on data access see Section 6 of the General Notice.

4. DATA PROCESSING AND OUTSOURCING

Recipients of processing may include third party processors processing personal data on the basis of contracts concluded with the Bank, on behalf of the Bank and for specific purposes prescribed by the Bank. The Bank engages only data processors who or which provide adequate guarantees for the protection of personal data. Data Subjects can ask for information on the processors involved in processing as part of their exercise of their access right.

The processor's activity is regarded as an outsourced activity under Section 68 (1) of Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises, if it is associated with the financial service or



auxiliary financial service provided by the Bank and is considered as a continuous or regular activity under the same act.

The list of service providers performing outsourced activities for the Bank is available in subsection 4.6 of [MKB Bank Nyrt's General Business Rules](#).

Your data will not be transferred in the course of processing to any third country or any international organisation outside the European Economic Area.

5. AUTOMATED DECISION MAKING AND PROFILING

In connection with data processing, the Bank makes no automated decisions and performs no profiling based on automated processing of personal data.

6. RIGHTS OF THE DATA SUBJECT

Pursuant to Articles 15 to 22 of the GDPR the Data Subject has the right to:

- request access to their personal data;
- request rectification of their personal data;
- request erasure of their personal data;
- request restriction on the processing of their personal data;
- request data portability;
- object to the processing of their data based on the Bank's legitimate interest; and
- request that no decision based exclusively on automated processing be applied to them.

Moreover, the Data Subject has the right to:

- withdraw their consent to processing if processing was based on their prior consent, and
- lodge a complaint with the Bank regarding processing; as well as
- lodge a complaint with the competent supervisory authority or turn to the court.

For more information on the essence of the above rights that can be exercised in regard to processing and details on their exercising, see Section 11 of the General Privacy Notice.

7. POSSIBILITIES OF LEGAL REMEDY

Data Subjects have the right to file complaints concerning data processing by the Bank as detailed in Section 13 of the General Privacy Notice.

The Bank suggests that the Data Subject should use the option of filing a complaint with the Bank for quick and efficient complaint management, before lodging a complaint with the authority or instituting court proceedings.

Data Subjects may submit complaints in relation to the processing of their personal data to the National Authority for Data Protection and Freedom of Information (**NAIH** - H-1055 Budapest, Falk Miksa utca 9-11.; postal address: H-1363 Budapest, Pf.: 9.; e-mail: ugyfelszolgalat@naih.hu; telephone: +36 (30) 683-5969, +36 (30) 549-6838; +36 (1) 391 1400; fax: +36 (1) 391-1410), and the **court** that has jurisdiction over their place of stay.



1. Appendix 1:

| PURPOSE OF DATA PROCESSING | PROCESSED DATA, DATA CATEGORIES | LEGAL BASIS OF DATA PROCESSING | DURATION OF DATA RETENTION |
|--|--|---|---|
| Fulfilling customer due diligence obligation under Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (" AML Act ") | The data specified in Sections 7 to 11 of the AML Act | Fulfilment of legal obligation Article 6 (1) (c) GDPR; Sections 7 to 11 of the Money Laundering Act | 8 years specified in the AML Act (or ten years in cases specified in the same) from the termination of the business relationship or the fulfilment of the transaction order |
| Keeping the registry as per Section 57 of the AML Act | The data, documents, and records generated in relation to the business relationship, as specified in Section 57 of the AML Act | Fulfilment of legal obligation Article 6 (1) (c) GDPR; Section 57 of the Money Laundering Act | 8 years (or 10 years in cases specified in the AML Act) from the termination of the business relationship or the fulfilment of the transaction order |
| Processing as required for the performance of the contract concluded with the Bank | In addition to the applicant's data required for customer identification as prescribed by the AML Act: payment account number, IBAN number, account opening date, mailing address data of related services: If the customer uses the TeleBANKár service, the telephone number to which the TeleBANKár ID and the TeleBANKár password are to be sent; If the customer uses the TeleBANKár service, the TeleBANKár ID; The type and number of the bank card, and the name of its holder, appearing on the card, and the telephone number to which it is to be sent. | Performance of the contract Article 6 (1) b) GDPR | In the case of accounting documents (including the documents proving the conclusion of the contract and its termination, and the contract itself); 8 years as specified in Section 169 (2) of Act C of 2000 on Accounting (Accounting Act), otherwise the general limitation period (5 years) as per the Hungarian Civil Code |
| Data recorded and processed in relation to the performance of the contract concluded with the Bank – | Documents considered as accounting documents under the Accounting Act, and the data held in them. | Fulfilment of legal obligation (Article 6 (1) (c) GDPR); | In the case of accounting documents (including the documents proving the conclusion of the contract and its termination, and the contract itself); 8 |



| PURPOSE OF DATA PROCESSING | PROCESSED DATA, DATA CATEGORIES | LEGAL BASIS OF DATA PROCESSING | DURATION OF DATA RETENTION |
|---|--|--|--|
| to ensure legal compliance, after the termination of the contract | | Section 169 (1)-(2) of the Accounting Act | years as specified in Section 169 (1)-(2) of Act C of 2000 on Accounting (Accounting Act). |
| Communication with the customer | Mailing address or address for service; fixed line or mobile phone number, electronic mailing address (e-mail address) | Performance of the contract during its term (Article 6 (1) b) GDPR) | Until the termination of the contract/service |
| Obtaining FATCA declaration | The data prescribed by the relevant act, appearing in the prevailing FATCA Declaration (Family name and given name; Type and number of ID document; Customer ID; U.S. citizenship status; Green Card status; Status of place of birth in the United States of America; Status of permanent address of residence or address of stay in the United States of America; Status of mailing address or post box in the United States of America; Status of mobile telephone or fixed line telephone subscription with a service provider in the United States of America; Status of standing transfer order to accounts kept in the United States of America; existence of persons with home addresses in the United States of America who are authorised to dispose over and sign regarding the Customer's account; Status of tax ID in the United States of America; Status of persons acting as intermediaries; Status of reception of remuneration for the provision of personal service in the United States of America; Status of income actually relating to trading or business activity performed in the United States of America, signature) | Fulfilment of legal obligation (Article 6 (1) (c) GDPR); Act XIX of 2014 (FATCA Act) | From the termination of the legal relationship, general limitation period under the Hungarian Civil Code (5 years) |



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|--|---|--|---|
| <p>Obtaining related supplementary FATCA declaration</p> | <p><u>W-8ECI declaration:</u> Family name and given name Permanent address of residence in the United States of America U.S. taxpayer identification number Date of birth Type of personal services performed in the United States of America Signature</p> <p><u>W-4 declaration:</u> Family name and given name Permanent address of residence in the United States of America U.S. social security number Family status Amount of revenue from personal service provided in the United States of America Start of employment Employer identification number (EIN) Number of people living in the same household Rate of family tax allowance Amount of other loan debt Amount of other revenues Signature</p> <p><u>W-8BEN declaration:</u> Family name and given name Permanent address of residence in the United States of America U.S. mailing address or address of residence U.S. taxpayer identification number Date of birth</p> | <p>fulfilment of legal obligation (Article 6 (1) (c) GDPR): Act CXC of 2015</p> | <p>From the termination of the legal relationship, general limitation period under the Hungarian Civil Code (5 years)</p> |



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|-------------------------------|---|---|---|
| | Amount of preliminary tax credit Signature | | |
| Obtaining CRS declaration | Family name and given name Permanent address of residence Type and number of identification document Date of birth Tax residency Tax number/code (to be filled out only in the case of foreign tax residency under the CRS regulation) Customer ID Signature | Fulfilment of legal obligation (Article 6 (1) (c) GDPR); Act CXC of 2015 | From the termination of the legal relationship, general limitation period under the Hungarian Civil Code (5 years) |
| Provision of payment services | Data required for or relating to the execution of payment transactions: direct debit authorisation: name of account holder, account number, name recipient, ID of recipient, name of consumer, address of consumer, ID of consumer at the beneficiary, one-time transfer: account number to be debited; name of account holder, beneficiary account number, name of beneficiary customer, comment, number of document regular transfer: name of account holder, bank account number of account holder, name of beneficiary, account | fulfilment of legal obligation (Article 6 (1) (c) GDPR): Act LXXXV of 2009 on the Pursuit of the Business of Payment Services Section II of Annex 3 to MNB Decree 35/2017, and relevant provisions of the AML Act | 8 years specified in the AML Act (or 10 years in cases specified in the same) from the termination of the business relationship or the fulfilment of the transaction order. |



| PURPOSE OF DATA PROCESSING | PROCESSED DATA, DATA CATEGORIES | LEGAL BASIS OF DATA PROCESSING | DURATION OF DATA RETENTION |
|---|--|---|---|
| | <p>number of beneficiary, comment, number of document</p> <p>one-time inter-account transfer:</p> <p>account number to be debited, name of account holder, beneficiary account number, name of beneficiary customer, comment, document number.</p> <p>standing inter-account transfer order:</p> <p>account number to be debited, name of account holder, beneficiary account number, name of beneficiary customer, comment, document number.</p> <p>cash deposit:</p> <p>account number, name, place of birth and date of birth of payer, comment attached to deposition</p> <p>cash withdrawal:</p> <p>number of account to be debited, comment on payment, ID data of person withdrawing the amount</p> | | |
| Processing of other data relating to payment transactions | <p>one-time transfer:</p> <p>name of person submitting order, customer ID of person submitting order, transferor's reference to the transaction</p> <p>direct debit authorisation:</p> | performance of the contract (Article 6 (1) b) GDPR) | 8 years specified in the AML Act (or 10 years in cases specified in the same) from the termination of the business relationship or the fulfilment of the transaction order. |



| PURPOSE OF DATA PROCESSING | PROCESSED DATA, DATA CATEGORIES | LEGAL BASIS OF DATA PROCESSING | DURATION OF DATA RETENTION |
|--|---|---|--|
| | <p>name and customer ID of person submitting order,</p> <p>regular transfer: name and customer ID of person submitting order, transferor's reference to the transaction</p> <p>one-time inter-account transfer: name of person submitting order customer ID of person submitting order</p> <p>standing inter-account transfer order: name of person submitting order, customer ID of person submitting order</p> <p>fixing and breaking of deposits contract number, fixing transaction ID, term, interest, date and amount of maturity</p> | | |
| Compliance with accounting rules in relation to depositing and payment of cash | reference number, bank account number, deposit/withdrawal amount and currency, | <p>fulfilment of legal obligation (Article 6 (1) (c) GDPR):</p> <p>Section 167 (1)-(2) of Act C of 2000 on Accounting</p> | 8 years as specified in Section 169 (1)-(2) of Act C of 2000 on Accounting (Accounting Act) |
| Retraceable documentation of the data subject's instructions regarding the service | name and address of residence of the customer, bank account number of the customer, account number/deposit ID, | performance of the contract (Article 6 (1) b) GDPR) | From the termination of the legal relationship, general limitation period under the Hungarian Civil Code (5 years) |
| Data of beneficiary upon death | name and ID data of beneficiary (family name and given name, family name and given name at birth, place and date of birth, citizenship, mother's name at birth, address of residence, type and number of | performance of the contract (Article 6 (1) b) GDPR) | From the termination of the legal relationship, general limitation period under the Hungarian Civil Code (5 years) |



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|--|---|--|--|
| | ID document), citizenship, type and number of ID document, permanent address of residence | | |
| Transfer of customer's declaration to their employer to enable transfer of wage | employer name, employer address, employee name, date of birth, mother's name, bank account number | performance of the contract (Article 6 (1) b) GDPR) | From the termination of the legal relationship, general limitation period under the Hungarian Civil Code (5 years) |
| Documentation of receipt of suspect counterfeit banknotes | Name, address of residence, name and number of ID document, | fulfilment of legal obligation (Article 6 (1) (c) GDPR): Section 1 of Annex 4 to MNB Decree 11/2011 | General limitation period as per the Hungarian Civil Code (5 years) |
| Ensuring withdrawal of cash free of charge as prescribed by law | ID data of natural person user, bank account number specified in their cash withdrawal declaration | fulfilment of legal obligation (Article 6 (1) (c) GDPR): Section 36/A (5) of the Payment Services Act | From the termination of the legal relationship, general limitation period under the Hungarian Civil Code (5 years) |
| Use of the Immediate Payment System (IMPS) (ensuring that the amount transferred is credited to the recipient's account within 5 seconds of receipt of the transfer order) | In addition to the ID data of the account holder or the person authorised to dispose over the account as specified in the AML Act, the secondary ID (email address, telephone number, tax ID) voluntarily provided at the discretion of the person concerned, for the use of the immediate payment service, which identifier is used for the identification of the payment account of the account holder as beneficiary in the case of an immediate payment order | consent of the person concerned (Article 6 (1) (f) DPR) | until withdrawal of consent or, in the absence of prolongation, 1 year from the date of granting |