



PRIVACY NOTICE

Contact persons, representatives, contributors and natural person contracting parties

The purpose of this special notice (hereinafter: '**Notice**') is to provide transparent information, in plain language, for natural persons and legal entities concluding contracts with MKB Bank concerning the processing of personal data collected by MKB Bank in relation to the conclusion and maintenance of the contracts and the circumstances of processing, in accordance with General Data Protection Regulation EU No 2016/679 ('**GDPR**').

In the contract conclusion process the Bank and its contracted partner(s) (hereinafter collectively: Contracting Parties) mutually qualify as data controllers with regard to the processing of personal data of the natural persons specified in the contract concluded between them as contact persons, authorised to represent them and participating in the performance of the contract (hereinafter: Data Subject). The Bank's natural person contracting party shall also qualify as Data Subject for the purposes of data processing in relation to the contract conclusion procedure.

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	MKB Bank Nyrt. ('Bank' or 'Controller')
Registered office	H-1056 Budapest, Váci u. 38., Hungary
Central contact data	E-mail: ugyfelszolgalat@mkb.hu
Website	Telephone: +36 (80) 350-350 (MKB TeleBANKár)
Company registration number	www.mkb.hu 01-10-040952

CONTACT DETAILS OF DATA PROTECTION OFFICER

Postal address	H-1134 Budapest, Kassák Lajos u. 16-18.
E-mail address	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. THE PURPOSE AND LEGAL BASIS OF THE PROCESSING OF PERSONAL DATA AND THE PROCESSED DATA

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

- preparation, conclusion and performance of the contract between the Contracting Parties;



- b) liaising in relation to the person/customer affected by data processing;
- c) communication, administration and accounting settlements between the Contracting Parties during the contract;
- d) mutual performance and exercising of the obligations and rights relating to the use of the 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 durations of the various data processings performed by the Bank, see Section 5 of the General Privacy Notice.

The retention times 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**"). The 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.

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, PROFILING

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 15-22 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 (Hungarian acronym **NAIH** – H-1055 Budapest, Falk Miksa utca 9-11.; mailing 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.



Appendix 1:

DATA SUBJECT	PURPOSE OF DATA PROCESSING	PROCESSED DATA, CATEGORIES OF DATA	LEGAL BASIS FOR DATA PROCESSING	DATA RETENTION PERIOD
Natural persons identified as contact persons without authorisation to sign (contact persons)	Preparation, conclusion and performance of the contract between the Contracting Parties.	The controller's legitimate interest relating to contractual communication and administration.	Natural persons identified as contact persons without authorisation to sign (contact persons)	Preparation, conclusion and performance of the contract between the Contracting Parties.
The Parties' representatives signing the agreement (<i>Representatives</i>)	Preparation, conclusion and performance of the contract between the Contracting Parties.	The controller's <i>legitimate interest</i> relating to contractual communication and administration. (Article 6 (1) (f) of the GDPR)	Data required for identification (name), specimen signature, position at work likely underlying the power of representation.	Until the termination of the contract.
Employees participating in performance, and contributors in other relationships aimed at work (<i>third party providers</i>)	Preparation, conclusion and performance of the contract between the Contracting Parties.	The controller's legitimate interest relating to contractual communication and administration. (Article 6 (1) (f) of the GDPR)	Personal data strictly required for the performance of the contract (e.g. contact details, position, job)	Until the termination of the contract.
Natural person contracting party (<i>contracting parties</i>)	Preparation and conclusion of the contract between the Contracting Parties.	Taking steps before the conclusion of the contract at the data subject's request. (Article 6 (1) b) of the GDPR)	Data required for identification (name, mother's name, place and date of birth), contact details, invoicing details (e.g. tax identification code, bank account number), signature.	Until the termination of the contract.
AFTER THE TERMINATION OF THE CONTRACT				
Contact persons, representatives, third party providers, natural	Adequate settlement of contractual relationship between the Contracting Parties (claims	The controller's legitimate interest relating to the	Data specified in section II./A.	Until the end of the general period of



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person contracting parties.	stemming from the contract) after the termination of the contract.	establishment, pursuing and protecting of its legal claims stemming from the legal relationship. (Article 6 (1) (f) of the GDPR)		limitation (of 5 years) following the termination of the contract under Act V of 2013 on the Civil Code.
Contact persons, representatives, third party providers, natural person contracting parties.	Compliance with the provisions of <i>Act C of 2000 on Accounting</i> (hereinafter: Accounting Act).	<i>Fulfilment of the legal obligation</i> specified in Section 169 (2)-(3) of the Accounting Act. (GDPR Article 6 (1) (c))	Personal data qualifying as accounting documents under the Accounting Act.	Until the end of the retention time (of 8 years) specified in the Accounting Act.