

GENERAL DATA PROTECTION POLICY

1. Processing, groups of data subjects

1.1. OTP Bank Plc. as controller shall process — in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (hereinafter: “**General Data Protection Regulation**”), Act CXII of 2011 on the right to informational self-determination and on the freedom of information (hereinafter: “**Privacy Act**”) and any other applicable legislation, as detailed in the Business Regulations and its annexes, the division business regulations on specific financial services (including ancillary financial services), on investment services (including ancillary services), and on any other services that may be provided by OTP Bank Plc. under the applicable law (hereinafter: “**Services**”), as well as in the related privacy notices (for the purposes of processing issues, the business regulations governing the Services and the related privacy notices shall be hereinafter collectively referred to as “**Information on Processing**”) — the personal data of:

- a) natural persons using the Services of OTP Bank Plc.;
- b) natural persons (e.g. legal representatives, persons authorised for disposal, beneficial owners) establishing a relationship with OTP Bank Plc. on behalf of legal persons or organisations without legal personality (e.g. civil law partnerships, civil companies, condominiums, other organisations not registered by court) using the Services of OTP Bank Plc.;
- c) natural persons establishing a relationship with OTP Bank Plc. for the purpose of using its Services;
- d) natural persons specified in Point b) above acting on behalf of legal persons or organisations without legal personality (e.g. civil law partnerships, civil companies, condominiums, other organisations not registered by court) establishing a relationship with OTP Bank Plc. for the purpose of using its Services;
- e) natural persons (legal representatives, parents, guardians, conservators, authorised representatives, signatories) representing, or acting on behalf of, persons specified in Point a);
- f) heir(s) of the persons specified in Point a);
- g) any other natural persons involved in the provision of the Services (e.g. sureties, owners or usufructuaries of a real estate serving as collateral, relatives, dependents, other future co-habitants, beneficiaries, pledgers, obligors of collateral security);
- h) witnesses;
- i) professional translators, interpreters;
- j) other third parties defined in the Information on Data Processing (the parties listed in Points a)–j) above shall be hereinafter collectively referred to as “**the Data Subject(s)**”).

2. Groups of data processed

2.1. As detailed in the Information on Data Processing, OTP Bank Plc. processes the following main groups of the Data Subjects' personal data:

- a) data prescribed by law for personal identification and customer due diligence (see, in particular, the Public Announcement referred to in Section II.2 of the Business Regulations), including the Data Subject's signature;
- b) data required for liaising;
- c) data required for the conclusion and performance of a contract for the provision of the service concerned, including, in particular, data required for the amendment or termination of a contract for the provision of the given service, or for the enforcement or assignment of a claim, factoring (including data necessary for determining the risk) and data generated during the enforcement of a claim;
- d) data required for performing the tax liabilities of the Data Subject or of OTP Bank Plc. in relation to the Data Subject, or for investigating eligibility to state subsidies;
- e) data required for OTP Bank Plc. to fulfil its data reporting requirements in relation to the Data Subject;
- f) data related to complaint handling;
- g) data required for creating customer groups to ensure compliance with Recommendation No. 28/2018. (XII. 10.) of the Magyar Nemzeti Bank (Hungarian National Bank);
- h) identifying data of Data Subjects and their transactions indicated on a certificate returned or issued by debt managers, as well as information on the amount, recovery and current status of a claim.

2.2. As detailed in the Information on Data Processing, in addition to data submitted by the Data Subjects, OTP Bank Plc. may also collect the Data Subjects' personal data from the following sources:

- a) from filing systems containing data relevant to the Data Subject that are either public and/or accessible to anyone, subject to demonstration of their right or legitimate interest;
- b) from filing systems available to members of OTP Group which contain data required for the conclusion and performance of a contract for the provision of the services concerned. Members of OTP Group are listed in the Information on Processing;
- c) from organisations specified in the legislation on mandatory processing (Section 7 of this Annex);
- d) from other sources specified in the Information on Data Processing.

3. Purposes of processing

3.1. As detailed in the Information on Data Processing, OTP Bank Plc. processes the Data Subjects' personal data for the following main purposes or for one or more of those purposes:

- a) identification of the Data Subject;
- b) liaising;
- c) exercise of contractual rights and performance of obligations, including settlement of accounts in accordance with the legal relationship stipulated in the contract;

- d) direct marketing;
- e) OTP Bank Plc.'s fulfilment of its tax liability in relation to the Data Subject;
- f) OTP Bank Plc.'s fulfilment of its data reporting requirement in relation to the Data Subject;
- g) enforcement of the legitimate interest and interests of OTP Bank Plc. detailed in the Business Regulations and in the Information on Data Processing;
- h) other transaction-specific processing purposes detailed in the Information on Data Processing.

4. Legal bases for processing

4.1. In distributing its products and rendering its services (hereinafter collectively: "service provision") and in preparing for the service provision, OTP Bank Plc. shall process the Customers' data on the grounds of one (or more) of the following legal bases:

- a) preparing the conclusion of service contracts and the performance thereof, including the establishment, exercise or defence of pertinent legal claims;
- b) mandatory processing;
- c) OTP Bank Plc.'s legitimate interest, including processing for direct marketing purposes as defined in these Business Regulations;
- d) carrying out tasks in the public interest in which OTP Bank Plc. participates;
- e) consent of natural persons defined in Section 1.1 Points a) and c) of this Annex.

4.2. Primarily, OTP Bank Plc. processes the personal data of the Data Subjects specified in Section 1 on the legal basis of preparing the conclusion of contracts for service provision and performance thereof [Section 4.1 Point a)]. In any other cases, the Information on Data Processing shall specify the legal bases applied and the data group(s) processed on the grounds of the legal basis concerned.

5. Preparation of the conclusion and performance of contracts

5.1. For the purposes and on the grounds of preparing the conclusion of contracts for the provision of Services and the performance thereof, OTP Bank Plc. processes the following data:

- a) data to verify the contractual terms specified in business regulations on specific financial or investment services;
- b) personal data submitted on forms, data sheets and other documents submitted during the preparations for contract conclusion or communicated via other channels;
- c) personal data submitted to OTP Bank Plc. on any documents or communicated via other channels during the performance of the contract, or contained in documents prepared or otherwise obtained by OTP Bank Plc. during the performance of the contract; and
- d) information or notifications submitted in order to facilitate contract conclusion and performance as well as data supplied for the purposes of such notifications, with special regard to data pertaining to an approaching or missed payment deadline, notices on the possible negative consequences of failure to comply with the contractual terms or information on the requirements to be fulfilled in order to become eligible to an advantage offered in the contract.

5.2. Some business regulations on specific financial or investment services may require – for contract conclusion and performance – the provision of a phone number or email address for liaising purposes.

5.3. Pursuant to the General Data Protection Regulation, OTP Bank Plc. shall be entitled to search for the current contact details if they are incorrect or missing.

5.4. Where preparations for contract conclusion constitute the legal basis for processing, the duration of processing shall be identical with the period during which claims may be enforced in relation to the failure of concluding the contract. Unless prescribed otherwise by law or by a binding legal act of the European Union, claims shall lapse after five years, which means that, in cases specified in the Civil Code, the limitation period may be interrupted and recommence after such interruption or following the final conclusion of the proceedings interrupting the limitation period; or, if the obligee is unable to enforce a claim for an excusable reason, the limitation period shall be suspended. In this case, the claim shall remain enforceable within one year from the time when the said reason is eliminated even if the period of limitation has already lapsed or less than one year is remaining.

5.5. Pursuant to Section 57(1) of the Act on the Prevention and Combating of Money Laundering and Terrorist Financing, for contracts concluded on the grounds of preparing for the conclusion and of the performance of a contract, the period of processing shall be up to eight years after the end of the business relationship.

5.6. Since OTP Bank Plc. would be unable to prepare, conclude and perform a contract without the personal data required for the conclusion thereof, the Data Subject shall supply personal data for these purposes to OTP Bank Plc. In the absence of such data supply, OTP Bank Plc. shall be entitled to refuse concluding and performing the contract.

6. Recording of phone calls

6.1. OTP Bank Plc. shall be entitled to record phone conversations with the Data Subject and the displayed phone number in the following cases:

- a) calls received by or made from the call centre of OTP Bank Plc.;
- b) calls made for the purposes of OTP Bank Plc.'s telephone sales activity;
- c) calls made for the purposes of OTP Bank Plc.'s arrears management activity;
- d) calls for the purposes of data reconciliation relating to bank card and bank account transactions;
- e) calls relating to the reporting of personal data breaches;
- f) in any other cases specified in the Information on Data Processing.

6.2. In the cases defined in Points a), b) and c), the legal basis for processing, by default, shall be the verifiability of statements made in the course of performing the rights and obligations stipulated in the contract, and/or Article (6)1(b) of the General Data Protection Regulation in order to facilitate the enforcement of legal claims arising from the contract.

6.3. Where the caller is a person other than the Data Subjects listed in Section 1, in the cases defined in Points a), b) and c) the legal basis for processing shall include, in

accordance with Article (6)1(f) of the General Data Protection Regulation, the legitimate interest of OTP Bank Plc. to be able to provide exhaustive answers to the questions of persons establishing a relationship with it and to demonstrate the content and compliance of the communications with such Data Subjects if required.

6.4. OTP Bank Plc. shall be entitled to record phone conversations with the Data Subject and the displayed phone number — on the legal basis of compliance with a legal obligation in accordance with Article (6)1(c) of the General Data Protection Regulation — in the following cases:

- a) complaints relating to the relevant activities of OTP Bank Plc. as a financial institution and as an investment service provider;
- b) calls relating to transactions executed by OTP Bank Plc. as an investment service provider in the framework of own account trading and to the receipt, transmission and execution of orders on behalf of customers.

6.4.1. In the case specified in Point a), the legal basis for processing shall be Section 288 of the Act on Credit Institutions and Financial Enterprises and Section 121 of the Act on Investment Firms and Commodity Dealers, and on the Regulations Governing their Activities.

6.4.2. In the case specified in Point b), the legal basis for processing shall be Section 55 of the Act on Investment Firms and Commodity Dealers, and on the Regulations Governing their Activities, for the purposes of compliance with the record-keeping obligations related to contracts specified therein and for inspections under Article 76 of Commission Delegated Regulation (EU) 2017/565.

6.4.3. In the cases specified in Section 6.1 Points d) and e), the legal basis for processing shall be — in accordance with Article (6)1(f) of the General Data Protection Regulation — the legitimate interest of OTP Bank Plc.

6.5. In the case of contracts not concluded or in the case of calls recorded on the grounds of legitimate interests or compliance with a legal obligation, audio recordings shall be preserved by OTP Bank Plc. for a period of five years and, in the case of concluded contracts — in accordance with Section 57(1) of the Act on the Prevention and Combating of Money Laundering and Terrorist Financing — for up to eight years.

6.6. In order to maintain a balance between the position of the Data Subject and OTP Bank Plc., the Data Subject conducting the telephone conversation may also record the conversation. However, recording by the Customer shall serve the same purpose for which OTP Bank Plc. records the conversation. The Data Subject is required to inform OTP Bank Plc. of recording when commencing the conversation. The Data Subject shall not publish the voice recording made either by OTP Bank Plc. or by the Data Subject, and shall be limited to using it during a potential legal dispute with OTP Bank Plc. In the case of a dispute, voice recordings made by OTP Bank Plc. shall be taken into account in all cases.

7. Mandatory processing

7.1. OTP Bank Plc. shall process personal data on the legal basis of mandatory processing where the processing is prescribed by law or a binding legal act of the

European Union. The data categories to be processed, the purpose(s) of processing, the data retention period, potential recipients of the data transfer and any other conditions for the processing are detailed in the legislation prescribing such processing.

7.2. Pursuant to Section 57(1) of the Act on the Prevention and Combating of Money Laundering and Terrorist Financing, OTP Bank Plc. shall keep in its records the personal data processed in relation to business relationships (see, in particular, the Public Announcement referred to Section II.2 of the Business Regulations) for a period of eight years.

7.3. Pursuant to the provisions of the Act on Accounting, for the closing of books at the end of the financial year, for drawing up the financial report and to support the various balance sheet items, an inventory audit shall be completed and maintained by OTP Bank Plc., which also includes the inventory audit of the claims against Customers [Section I.2 of the Business Regulations, including the natural persons defined in Section 1.1 Point a) of this Annex].

7.4. Pursuant to the Act on Accounting, the accounting documents underlying the accounting records directly or indirectly (including general ledger accounts, analytical records and registers) — thus any personal data contained in the foregoing — shall be retained by OTP Bank Plc. for a minimum of eight years in a form that is legible and retrievable by means of the code of reference indicated in the accounting records.

7.5. In the case of credit products, pursuant to the Act on the Central Credit Information System (in Hungarian and hereinafter: “KHR”), after the conclusion of a contract subject to data provision, and where the conditions set out in that Act apply, OTP Bank Plc. as reference data provider shall submit in writing to the KHR the reference data of natural persons specified in the laws.

7.6. Moreover, various laws require the reporting of data to a number of public institutions, including the transfer of taxation-related data.

7.7. OTP Bank Plc. shall process the personal data necessary for the mediation of EU and state grants and subsidies specified in legislation on the grounds of compliance with legal obligations. This includes, as detailed in the Information on Data Processing, processing prescribed by legislation on housing subsidies.

7.8. The Information on Data Processing may specify additional mandatory processing operations along with their respective retention periods.

7.9. Given that OTP Bank has a legal obligation to record, store and disclose data — as required by separate legislation — subject to mandatory processing or to otherwise process personal data, failure to supply such data may lead to the refusal of the conclusion or the performance of a contract.

8. Legitimate interest as the legal basis for processing

8.1. In addition to these Business Regulations, the Information on Data Processing identifies the specific cases and data types where the legal basis for processing is OTP

Bank Plc.'s legitimate interest. The Data Subject may object to processing where the legal basis for processing is OTP Bank Plc.'s legitimate interest.

8.2. In accordance with the General Data Protection Regulation, OTP Bank Plc. shall be entitled to use the personal data of natural persons defined in Section 1.1. Points a) and c) of this Annex — subject to the application of necessary and adequate data security measures (such as pseudonymisation and encryption) — for the development and application of algorithms required for the purposes of analyses on product, service or process development or consumer habits.

8.3. In accordance with the General Data Protection Regulation, OTP Bank Plc. shall be entitled to use the personal data of Data Subjects — subject to the application of necessary and adequate data security measures (such as pseudonymisation and encryption) — for the purposes of statements or analyses on the business operations of OTP Bank Plc.

8.4. In accordance with the General Data Protection Regulation, OTP Bank Plc. shall be entitled to use the personal data of natural persons defined in Section 1.1. Points a) and c) of this Annex to dispatch paper-based consignments for direct marketing purposes and for this purpose, to conduct profiling by way of querying the data available on the natural persons above, if they did not object to processing for direct marketing purposes. Data Subjects may at any time object to the processing of their personal data for direct marketing purposes, and in such case, OTP Bank Plc. shall terminate the processing of their personal data for these purposes. Whenever OTP Bank Plc. contacts Data Subjects, it shall explicitly bring to their attention their right to object.

8.5. In accordance with the General Data Protection Regulation, OTP Bank Plc. shall be entitled to send to the natural persons defined in Section 1.1. Points a) and c) of this Annex messages for direct marketing purposes regarding its own, similar products via email or through any equivalent individual communication channel.

8.6. Sections 8.4 and 8.5 above govern processing aimed at the use of personal data for the purposes of backtesting the success or efficiency of direct marketing activities and of using the results thereof for the purposes of designing future campaigns.

8.7. In accordance with the General Data Protection Regulation, OTP Bank Plc. shall be entitled to use the personal data of Data Subjects for requesting their participation in research conducted for the purposes of product or business development. Participation in research shall take place in accordance with Section 10.

8.8. In accordance with the General Data Protection Regulation, OTP Bank Plc. shall be entitled to use the personal data of Data Subjects to create customer groups during the corporate lending processes of members of the Banking Group.

The purpose of data processing is to include natural persons qualifying as associated persons in the group of corporate customers to enable OTP Bank Plc. to manage the risks related to the foregoing as a single risk during its lending (approval, monitoring) processes to ensure compliance with the relevant legal obligations (under Regulation 575/2013/EU

and Recommendation No. 28/2018. (XII.10.) of Hungarian National Bank (Magyar Nemzeti Bank).

The sources of data processed to create customer groups are the Data Subjects and the data of natural persons involving retail or corporate lending transactions available from the IT systems of OTP Bank Plc., and any other data submitted therewith.

8.9. Pursuant to the General Data Protection Regulation, OTP Bank Plc. is entitled to use the personal data of Data Subjects and their transactions (identifying data, data on the amount, recovery and current status of a claim) for existing or future Services (such as conducting credit approval, verifying compliance with the conditions of account opening, etc.) for the risk assessment of Data Subjects, monitoring claims, preparing risk analyses, for Group-level provisions, calculating loan losses and for ensuring compliance with other obligations of the parent company.

The source of personal data is the Data Subject (for debt clearing certificates) or the data provision by OTP Factoring Ltd. The personal data processed are the identifying data of Data Subjects and their retail or corporate lending transactions, as well as any relevant recovery data and/or information about the current status of such transactions. The Controller shall process the data in a manner described above for eight years following termination of the legal relationship.

8.10. For bank security purposes, OTP Bank Plc. may make photo and video recordings upon the use of banking services on its premises open for Customers and at its automated teller machines. The relevant signs (stickers, pictograms, etc.) warning Data Subjects of the recording are located at the branch entrances and at the automated teller machines. OTP Bank Plc. processes such recordings to protect personal data, trade, bank and securities secrets, as well as the safety of individuals and property, in accordance with its legitimate interest in protecting such interests. In the course of such processing, the retention period of photo and video recordings is 60 calendar days for recordings made on OTP Bank Plc.'s premises open for customers, and 60 calendar days for recordings made at automatic teller machines, from the creation of such data.

8.11. In order, amongst others, to provide exhaustive answers to the questions of persons establishing a relationship with OTP Bank Plc. and to demonstrate the content and compliance of the communications with such persons if required, OTP Bank Plc. is entitled under the General Data Protection Regulation to process and retain for a period of five years the personal data contained in the messages submitted to its communication channels (thus, in particular, to its postal address, email address or its other online portals) by a sender who is not a Data Subject listed in Section 1 and submitted personal data during the exchange of messages.

9. Performance of tasks carried out in the public interest as the legal basis for processing

9.1. Where OTP Bank Plc. participates in carrying out tasks in the public interest based on legislation or on a binding legal act of the European Union, OTP Bank Plc. shall process the personal data specified by law or a binding legal act of the European Union governing such task for a duration and in accordance with the conditions defined therein.

- 9.2.** OTP Bank Plc. participates in tasks carried out in the public interest:
- a) as agent bank in the execution of payments charged to the National Deposit Insurance Fund (Országos Betétbiztosítási Alap);
 - b) in the execution of payments charged to the Investor Protection Fund (Befektetés-védelmi Alap)
- in accordance with the provisions of the laws governing the above-mentioned activities.

10. Processing based on consent

10.1. In addition to the provisions of this Annex to the Business Regulations, the Information on Data Processing identifies cases and data types where the legal basis for processing is the Data Subject's consent (their freely given, specific, informed and unambiguous indication of agreement). Consent may be given in a separate statement or, independent of any other statements, in the contract for the provision of services, by precisely stating the relevant personal data.

10.2. In the cases detailed in the Information on Data Processing and based on the Data Subject's explicit consent, OTP Bank Plc. may also process the Data Subject's personal data during automated decision-making and profiling.

10.3. Sensitive data relating to the disability of persons with disabilities under the Act on the Rights and Equal Opportunities of Persons with Disabilities (people with reduced mobility, blind/visually impaired, deaf/hard-of-hearing, persons unable to read/write) shall only be processed with the Data Subject's written consent exclusively for determining the method of contacting/providing customer information to the Customer and the special treatment required in the specific case; i.e. for the personalised handling of matters.

10.4. OTP Bank Plc. shall process the personal data of the persons listed in Section 1.1 Points a) and c) of this Annex based on explicit consent and for the following purposes:

- a) to communicate advertising messages via email or through any equivalent individual communication means in consideration of the provisions of the Act on the Basic Requirements and Certain Restrictions of Commercial Practices;
- b) to send analysis-based, personalised direct marketing offers.

10.5. Consent is given freely, and Data Subjects may withdraw their consent at any time, without limitation, in a notification addressed to OTP Bank Plc. Data Subjects may send the notification to any of the contact details listed in the Information on Processing.

10.6. A withdrawal of consent will entail no consequences with regard to the Data Subjects. However, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

11. Automated decision-making in individual cases

11.1. OTP Bank Plc. may also process personal data for the purposes of decision-making based on automated processing, which may result in decisions that have legal effects on the natural persons defined in Section 1.1 Points a) and c) of this Annex, or significantly affect them in a similar manner.

11.2. With respect to automated decision-making, including profiling, the Information on Data Processing shall determine:

- a) the cases in which such processing may be used;
- b) the legal basis for such processing (i.e. based on the Data Subject's explicit consent, to facilitate the conclusion and/or performance of a contract to be concluded with OTP Bank Plc., or based on the provision of any applicable law to which OTP Bank Plc. is subject);
- c) the categories of personal data involved;
- d) information about the logic on which the automated decision-making is based; and
- e) the envisaged consequences of the decision made on the basis of automated decision-making for the persons using the Services.

11.3. In relation to automated decision-making, OTP Bank Plc. shall safeguard the right of natural persons referred to in the first paragraph of this Section to:

- a) request the intervention of a person with appropriate competence and authorisation on the part of OTP Bank Plc. (human intervention) to inspect and potentially override the decision;
- b) express their point of view regarding the automated decision-making; and
- c) to contest the decision before OTP Bank Plc.

11.4. Moreover, OTP Bank Plc. shall ensure that the person performing the inspection evaluates all data and facts available, including any additional data submitted by the natural person defined in Section 1.1 Points a) and c) of this Annex.

12. Data transfers within the OTP Group

12.1. In addition to the cases specified by the laws or in a binding legal act of the European Union (such as data transmissions to the tax authority, tax authorities of other states, the Hungarian State Treasury and supervisory authorities), OTP Bank Plc. shall transfer data to individual members of the OTP Group for the following purposes:

- a) to determine the accuracy of the Data Subject's contact details;
- b) to perform creditworthiness assessment, risk assessment and risk evaluation as part of the preparations for the conclusion of contracts with the natural persons defined in Section 1.1 Point c) of this Annex;
- c) to monitor any material adverse changes in the collateral underlying the contract, the adequacy of the collateral or the Customer's circumstances during the performance of contracts with the natural persons defined in Section 1.1 Point a) of this Annex;
- d) to create customer groups for compliance with Recommendation No. 28/2018. (XII. 10.) of Hungarian National Bank (Magyar Nemzeti Bank);
- e) for creditworthiness assessment, risk assessment and risk evaluation purposes as part of the preparations for the conclusion of contracts with the natural persons establishing a relationship with OTP Bank Plc. on behalf of legal persons or organisations without legal personality specified in Section 1.1 Point b) of the present Annex using the Services of OTP Bank Plc., to monitor any material

adverse changes in the collateral underlying the contract, the adequacy of the collateral or the Customer's circumstances during the performance of contracts.

12.2. The Information on Data Processing shall determine what data and to which members of the OTP Group are transferred by OTP Bank Plc.

12.3. The legal basis for processing under this Section shall be the legitimate interest of OTP Bank Plc. and of specific members of the OTP Group to be able to contact with their customers or other Data Subjects during the conclusion and performance of the contract with such persons and to mitigate any risks arising from such contracts.

13. Data transfers to a third country

13.1. OTP Bank Plc. shall primarily transfer personal data to a third country or to international organisations in the cases defined in law or in a binding legal act of the European Union. Third countries are countries outside of the Member States of the European Union except Iceland, Lichtenstein and Norway.

13.2. Transfers to the Government of the United States of America with respect to the Account Holder's identity, account and account balance shall be based on legally binding international convention pursuant to the provisions of the Act 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 certain related Acts.

13.3. Moreover, OTP Bank Plc. is also obligated to transfer data with respect to the Account Holder's identity, account and account balance pursuant to the Act on International Administrative Cooperation in Matters of Taxation and Other Compulsory Payments and the Act on the Promulgation of the Multilateral Agreement between the Competent Authorities on the Automatic Exchange of Financial Account Information.

13.4. Data transfers to third countries or to international organisations shall be also permitted where:

- a) the Commission of the European Union has determined that the third country, a territory or one or more specified sectors within that third country, or the international organisation in question ensures an adequate level of protection (e.g. Switzerland, Israel);
- b) the transfer is based on a sample data protection agreement accepted or approved by the Commission of the European Union;
- c) the transfer is based on contractual clauses between OTP Bank Plc. and the recipient of the transfer approved by the National Authority for Data Protection and Freedom of Information;
- d) the transfer is based on a code of conduct approved by the Commission of the European Union to which the recipient of the transfer joined;
- e) the transfer is based on a certificate which is owned by the recipient and has been approved in accordance with the General Data Protection Regulation;

- f) the transfer is based on OTP Bank Plc.'s binding corporate rules approved by the National Authority for Data Protection and Freedom of Information.

13.5. If the conditions listed in the previous paragraph are not met, OTP Bank Plc. shall only transfer personal data to a third country or to an international organisation if:

- a) the Data Subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the Data Subject;
- b) the transfer is necessary for the performance of a contract between a Data Subject and the controller or the implementation of pre-contractual measures in response to the Data Subject's request;
- c) the transfer is necessary for the conclusion or performance of a contract concluded in the interest of a Data Subject, between the controller and another natural or legal person;
- d) the transfer is necessary on grounds of important public interest;
- e) the transfer is necessary for the establishment, exercise or defence of legal claims;
- f) the transfer is necessary in order to protect the vital interests of the Data Subject or of other persons, where the Data Subject is physically or legally incapable of granting consent;
- g) the transfer is made from a register which, pursuant to the laws or a binding legal act of the European Union, is intended to provide information to the public and which is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that the conditions laid down by such laws or binding legal act of the European Union for consultation are fulfilled in the particular case.

13.6. The Information on Data Processing shall determine whether data are transferred by OTP Bank Plc. to a third country or to an international organisation.

14. Use of a processor

14.1. OTP Bank Plc. shall be entitled to engage a processor for performing certain processing operations subject to notifying the Data Subjects. In the scope of its credit institution activities, OTP Bank Plc. engaged the individuals and organisations designated in Annex 2 of the Business Regulations to perform the processing activities and operations specified therein. The Information on Data Processing may designate sub-processors with respect to the processing activities regulated therein, specifying, at the same time, the processing activities and operations performed by the processors. Data Subjects shall be notified through the publication of Annex 2 of the Business Regulations and the Information on Data Processing on the website of OTP Bank Plc.

14.2. OTP Bank Plc., as controller, shall be responsible for the lawfulness of the instructions relating to processing operations. The processors, in turn, shall be responsible for compliance with OTP Bank Plc.'s lawful instructions and for performing their obligations specifically assigned to them under the General Data Protection Regulation.

15. Use of SWIFT

15.1. For the execution of domestic forint transactions in the Real Time Gross Settlement System ('RTGS') as well as interbank foreign currency and cross-border payment transactions, and for the execution and settlement (clearing) of international financial operations and for the purposes of any ancillary information exchange related to any of these transactions, in accordance with the international standards and banking practice, OTP Bank Plc. uses the services of SWIFT (Society of Worldwide Interbank Financial Telecommunication, Avenue Adèle 1, B-1310 La Hulpe, Belgium), a company incorporated in Belgium.

15.2. It shall be through the SWIFT network and by using SWIFT services that OTP Bank Plc. shall transfer and receive the data of financial transactions (including but not limited to the amount and currency of the credit transfer, value date, name, address, account number, payment service provider and other identifier of the initiator of the transaction, name, address, account number, payment service provider and other identifier of the beneficiary) between the Data Subjects involved in the execution and/or settlement (clearing) of the transaction, in the interest of performing the contract with the Customer and in relation to the other party involved in the payment transaction (payer or beneficiary of the credit transfer) who is a non-OTP Plc. customer, for the purposes of enforcing the legitimate interests of OTP Bank Plc., its Customer and the other party in the execution of the credit transfer. These market operators may include, but are not limited to, the following:

- in HUF, RTGS as a Hungarian market infrastructure;
- in EUR, EBA Clearing STEP2 SCT and EURO1/STEP1, as well as TARGET2 as Pan-European market infrastructures;
- in any other currency, correspondent banks which maintain a correspondent bank account relationship with OTP Bank Plc. and/or with the payment service provider of the other Party who is not a customer of OTP Bank Plc.; and
- any other intermediary payment service provider whose participation as correspondent banks is required for the execution and/or settlement (clearing) of the payment transaction initiated in the relevant currency.

15.3. SWIFT operates several operation centres, including two sites in the EU and one in the USA. Data related to information exchanges in the territory of the EU shall only be stored in operation centres located in the territory of the EU; however, data involving other countries may also be stored in the USA-based data centre. Therefore, transaction data stored in the USA are subject to US jurisdiction, thus the competent authorities of the USA may require access to data stored in the operation centre as part of their counterterrorism efforts. US law does not offer a level of protection for personal data equivalent to the European Union law. The adequate protection of personal data stored by SWIFT in the territory of the USA is governed by high-level declarations and conventions between the competent institutions of the USA and the EU.

15.4. For further information about the related data protection principles and practices, please visit SWIFT's website at

- <https://www.swift.com/about-us/swift-and-data#SWIFTpoliciesprinciplesandpractices>
<https://www.swift.com/about-us/legal/compliance/tftp>

16. Data retention period

16.1. OTP Bank Plc. shall store the data of Data Subjects for a period specified in the laws or the binding legal acts of the European Union, thus, in particular, in the legislation referred to in Sections 5 to 9 of this information document and for a period specified therein.

16.2. In the case of processing based on consent, OTP Bank Plc. processes the data for as long as necessary to achieve the purpose of the processing. In cases where consent is withdrawn, OTP Bank Plc. shall erase the data unless processing may continue on the grounds of another legal basis.

16.3. Personal data kept in the post book kept by OTP Bank Plc. to certify the dispatch of mail consignments (see Section III.13 of the Business Regulations) will be processed (stored) for as long as the data retention period specified for each data record in the post book has expired. Where stored in other, paper-based documents, OTP Bank Plc. will continue to store the Data Subjects' data after the expiration of the data retention period until the execution of the scrapping procedure defined in the relevant document management policies. With respect to the personal data in a post book or other paper-based document after the expiry of their respective retention periods, the legal basis for further processing shall be OTP Bank Plc.'s legitimate interest in preserving the integrity and probative force of its paper-based documents; moreover, the fact that erasing data records in paper-based documents one by one would constitute disproportionate cost and effort relative to the Data Subject's right to the protection of personal data. OTP Bank Plc. shall apply adequate data security measures to store and restrict access to such data.

17. Rights of the Data Subject

17.1. Data Subjects rights related to data processing — including legal remedies — shall be governed by the provisions of the General Data Protection Regulation and the Privacy Act.

17.2. Data Subjects may contact OTP Bank Plc. to:

- a) request information on the processing of their personal data (such as banking secrets qualifying as personal data), including a copy of their data being processed (right of access);
- b) request the rectification of inaccurate personal data and contest the accuracy of the personal data registered (right to rectification);
- c) request the erasure of their personal data on record (right to erasure);
- d) request the restriction of the processing of their personal data (right to restriction of processing);
- e) request the Bank to make available to them, in an electronic database in a structured, commonly used and machine-readable format, the personal data submitted to the Bank and processed by the latter (right to data portability);
- f) object to the processing of their personal data, if the purpose of data processing is the legitimate interest of the controller or of a third party (e.g. processing for direct marketing purposes), or the performance of a task in the public interest or the fulfilment of a public function, in both cases including profiling (exercise of the right to object);

- g) request human intervention on the part of the controller in the case of automated decision-making to express their point of view;
- h) contest the decision made with the application of automated decision-making;
- i) lodge a complaint with regard to the processing of personal data and the exercise of their rights under the General Data Protection Regulation.

17.3. Before a Data Subject's request is granted, OTP Bank Plc. may ask the Data Subject to clarify the request, or specify the requested information and the processing activities concerned.

17.4. OTP Bank Plc. shall notify the Data Subject of the measures taken in response to the request (objection) as soon as possible, but no later than one month following the submission of the request (objection). If necessary, the above deadline may be extended by two additional months, taking into account the complexity and number of requests.

17.5. In the event OTP Bank Plc. has a reasonable doubt concerning the identity of the party filing a request under this Section, OTP Bank Plc. may request additional information to confirm the Data Subject's identity.

17.6. Where OTP Bank Plc. is proven unable to identify a Data Subject, it shall be entitled to refuse the request of such Data Subject.

17.7. Where a Data Subject's request is manifestly unfounded or excessive under the General Data Protection Regulation, OTP Bank Plc. may charge a fee taking into account the following fee items:

- a) direct cost of the data carrier where a paper-based copy is provided;
- b) direct cost of the data carrier where a copy is provided on an optic data carrier;
- c) direct cost of the data carrier where a copy is provided on another data carrier which can be used by electronic means;
- d) postal service fees applicable to consignments sent via post with added service as a registered, certified mail with return receipt included;
- e) cost of labour input in relation to the execution of the data request (actual cost of labour required for searching for the data, consolidating and organising the data, copying the requested data from its data carrier, and rendering any data unrecognisable that cannot be disclosed to the requesting party), which is calculated by multiplying the time required for the execution of the data request by the sum of the hourly regular personal allowances of the persons participating in executing the request.

18. Right of access

18.1 Unless provided otherwise by law or by a binding legal act of the European Union, Data Subjects are entitled to access all personal data that OTP Bank Plc. processes concerning them.

18.2 At the Data Subject's request, OTP Bank Plc. shall also confirm whether it processes the Data Subject's personal data and if yes, it shall provide the Data Subject with a copy of the personal data processed along with the following information:

- a) the purpose of processing;
- b) the categories of the personal data processed;
- c) the recipients or categories of recipients to whom OTP Bank Plc. disclosed or may disclose the Data Subject's personal data;
- d) the envisaged period for which the personal data will be stored, or, if the provision of this information is not possible, the criteria used to determine that period;
- e) the Data Subject's right to request from OTP Bank Plc. the rectification or erasure of personal data or restriction of processing of personal data concerning the Data Subject or to object to such processing;
- f) the right to lodge a complaint, in accordance with Section 24 of this Annex to the Business Regulations, addressed to the National Authority for Data Protection and Freedom of Information;
- g) in respect of personal data that was not provided by the Data Subject, information on the source from which the personal data originate;
- h) where OTP Bank Plc. also processes a Data Subject's personal data for the purposes of automated decision-making, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the Data Subject;
- i) information on any safeguards to ensure the appropriate protection of the Data Subject's personal data in the event of transfer to a third country or to an international organisation.

18.3 Upon request — provided that the Data Subject is clearly identifiable by OTP Bank Plc. — OTP Bank Plc. shall make available to the Data Subject the voice recordings made in the cases referred to in Section 6 of this Annex within the shortest possible time after receipt of the request but within 30 days at the latest, if any of the following conditions apply:

- indication of the duration of the call in the case of calls identified and initiated under an OTP Direct contract;
- in the case of calls not initiated under an OTP Direct contract;
 - the name of the call centre agent, the precise duration of the call; or
 - the initiating phone number or the precise duration of the call; or
 - the caller ID of the phone conversation concerned.

18.4 Where a Data Subject requests multiple copies of the above information, OTP Bank Plc. may charge a reasonable fee for additional copies in proportion to the administrative costs involved, taking into account the cost items listed in Section 16 of this Annex.

18.5 Where a Data Subject's right to obtain information (right of access) would adversely affect the rights and freedoms — thus, in particular, the trade secrets or intellectual property — of others, OTP Bank Plc. may refuse to grant the Data Subject's request.

19. Right to rectification

19.1. At the Data Subject's request, OTP Bank Plc. shall rectify or complete any inaccurate or incomplete personal data concerning the Data Subject. After granting the Data Subject's request for the enforcement of their right to rectification, OTP Bank Plc. shall immediately inform the persons to whom such Data Subject's personal data have

been disclosed, unless this proves impossible or involves disproportionate efforts for OTP Bank Plc.

20. Right to erasure

20.1. The Data Subject shall be entitled to initiate the erasure of personal data concerning them in the following cases:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed by OTP Bank Plc.;
- b) the Data Subject withdraws the consent granted, and there is no other legal basis for processing by OTP Bank Plc.;
- c) the Data Subject objects to the processing and there are no overriding legitimate grounds for the processing other than processing for direct marketing purposes based on legitimate interest;
- d) OTP Bank Plc. unlawfully processed the Data Subject's personal data;
- e) OTP Bank Plc. is required to erase the personal data in order to comply with an obligation imposed on it by law or by a binding legal act of the European Union; or
- f) the personal data have been collected in relation to services offered to children in relation to the information society.

20.2. Where OTP Bank Plc. has previously disclosed the personal data of a Data Subject and has an obligation to erase them, OTP Bank Plc. shall take all reasonable steps — including the implementation of technical measures — required to ensure that controllers which obtained the Data Subject's personal data as a result of the public disclosure thereof are also notified of the mandatory erasure of such personal data. In its notification, OTP Bank Plc. is required to notify all other controllers of the Data Subject's request to erase all links to the Data Subject's personal data or the copies and duplicates thereof.

20.3. After granting a Data Subject's request for the enforcement of their right to erasure, OTP Bank Plc. shall immediately inform the persons to whom the Data Subject's personal data have been disclosed, unless this proves impossible or involves disproportionate efforts for OTP Bank Plc.

20.4. OTP Bank Plc. shall be under no obligation to erase personal data in cases where processing is required:

- a) for OTP Bank Plc.'s compliance with an obligation related to the processing of personal data imposed on it by law or by a binding legal act of the European Union;
- b) for a task carried out in the public interest;
- c) for the purpose of archiving documents of enduring value, scientific or historical research purposes or statistical purposes in so far as the exercise of the Data Subject's right to be forgotten is likely to render impossible or seriously compromise that processing;
- d) for the submission, enforcement or defence of legal claims.

21. Right to restriction of processing

21.1. The Data Subject shall have the right to obtain from OTP Bank Plc. the restriction of

processing where one of the following applies:

- a) the accuracy of the personal data is contested by the Data Subject, for a period enabling OTP Bank Plc. to verify the accuracy of the personal data;
- b) the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) OTP Bank Plc. 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;
- d) the Data Subject has objected to processing, pending the verification whether the legitimate grounds of OTP Bank Plc. override those of the Data Subject.

21.2. Where processing has been restricted in accordance with the above, such personal data shall, with the exception of storage, only be processed with the Data Subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

21.3. OTP Bank Plc. shall inform the Data Subject before the restriction of processing is lifted.

21.4. After granting a Data Subject's request for the enforcement of their right to restriction of processing, OTP Bank Plc. shall immediately inform the persons to whom the Data Subject's personal data have been disclosed, unless this proves impossible or involves disproportionate efforts for OTP Bank Plc.

22. Right to object

22.1. Where processing is necessary for enforcing the legitimate interests of OTP Bank Plc. or of a third party under the provisions of this Annex to the Business Regulations or the Information on Processing, Data Subjects shall be entitled to object to the processing of their personal data for these purposes. If OTP Bank Plc. is unable to demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms cited in the Data Subject's objection or the establishment, exercise or defence of legal claims, OTP Bank shall no longer process the personal data for these purposes and shall be required to erase them. Where a Data Subject objects to processing for direct marketing purposes, their personal data shall no longer be processed for such purposes.

23. Right to data portability

23.1. Data Subjects shall have the right to receive — in a structured, commonly used and machine-readable format — the personal data concerning them which they made available to OTP Bank Plc. The Data Subject may exercise their right to data portability in relation to data processed by OTP Bank Plc.:

- a) based on the consent of the Data Subject; or
- b) where the processing is necessary for the performance of a contract between the Data Subject and OTP Bank Plc. 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.

23.2. The right to data portability may be exercised by the Data Subject in person, at a branch of OTP Bank Plc., by credibly verifying their identity.

23.3. At the Data Subject's request, where technically feasible, OTP Bank Plc. shall transfer the personal data directly to another controller specified in the Data Subject's request. The above right to data portability shall not give rise to any obligation for OTP Bank Plc. and another controller to implement or maintain processing systems that are technically compatible with one another. Where a Data Subject's right to data portability would adversely affect the rights and freedoms — in particular, the trade secrets or intellectual property — of others, OTP Bank Plc. may refuse to grant the Data Subject's request.

24. Legal remedy

24.1. Data Subjects may contact OTP Bank Plc.'s Data Protection Officer (see Section 24 of this information document) with questions, objections or complaints related to the processing of OTP Bank Plc.

24.2. Where the Data Subject considers that their rights under privacy legislation, as applicable from time to time, have been violated, the Data Subject may lodge a complaint with the National Authority for Data Protection and Freedom of Information.

24.3. Contact details of the National Authority for Data Protection and Freedom of Information:

Website: <http://naih.hu/>;

Address: H-1055 Budapest, Falk Miksa utca 9-11.

Postal address: H-1363 Budapest, Pf. 9.;

Telephone: +36 1 391 1400;

Fax: +36 1 391 1410;

Email: ugyfelszolgalat@naih.hu

24.4. The Data Subject may also seek judicial remedy. The litigation procedure falls within the jurisdiction of the tribunal with territorial competence, which in this case is the Budapest-Capital Regional Court. The action may also be brought at the regional court having jurisdiction at the Data Subject's home address or temporary address (see <http://birosag.hu/torvenyszekek>).

24.5. Additionally, Data Subjects may also engage a non-profit organisation or association established under Hungarian law whose objectives, as set out in its statutes, include the service of the public interest, and the defence of the rights and freedoms of Data Subjects in terms of personal data, for filing a complaint on behalf of the Data Subject, representing the Data Subject in court proceedings, and — if permitted by law — enforcing claims for damages on the Data Subjects' behalf.

25. Details of the controller and the data protection officer

25.1. With respect to the processing activities specified in the Business Regulations and in the Information on Data Processing, the name and contact details of the controller and the controller's data protection officer are the following:

Controller's name: OTP Bank Plc. (*Hungarian name: OTP Bank Nyrt.*)

Registered office: H-1051 Budapest, Nádor utca 16.

Postal address: OTP Bank Nyrt., H-1876 Budapest

Email: informacio@otpbank.hu

Telephone: +36 (1/20/30/70) 3 666 666

Website: www.otpbank.hu

Details of the controller's data protection officer:

Name: Zoárd Gázmár

Postal address: H-1131 Budapest, Babér u. 9

Email: adatvedelem@otpbank.hu

25.2. Where the processing constitutes joint processing with another controller, the Information on Data Processing shall contain the details of the other controller(s) and the data protection officer(s) of the other controller(s).