

PRIVACY NOTICE
ACCORDING TO IDENTIFICATION OF SHAREHOLDERS UNDER THE ACT OF SRD II

Data processing is governed by EU Regulation 2016/679 (General Data Protection Regulation) 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 and the freedom of information and freedom of information. CXII of 2011 (Infotv.).

Data subject acknowledges that OTP Bank Plc. uses his/her personal data defined in the present privacy notice in a way and for the purpose and duration specified below.

The below chart summarizes the main features of the data processing:

PURPOSE OF THE DATA PROCESSING	LEGAL BASIS OF THE DATA PROCESSING AND CONDITION OF THE DATA TRANSFER	SCOPE OF THE PROCESSED DATA	DURATION OF THE DATA PROCESSING
Identification of shareholders under the Act of SRD II	<p>Act no. LXVII of 2019 § 4. (1) The personal data of a natural person shareholder are processed by the company in order to enable the company to identify its existing shareholders in order to communicate with them directly with the view to facilitating the exercise of shareholder rights and shareholder engagement with the company and to enforce the provisions restricting the exercise of voting rights under the Articles of Association.</p> <p>There will be no data transfer.</p>	<p>Shareholder (natural or legal person, if he/she is private entrepreneur): owner type, citizenship, name, address / in case of private entrepreneur seat, e-mail address, ISIN code of OTP ordinary share, name of the custodian bank / unique identifier / KELER sub-account number, initial date of shareholding, number of shares, type of shareholding, name/unique identifier of third party nominated by the shareholder</p>	<p>Act no. LXVII of 2019 § 4. (1) The company has the right to store the personal data of a natural person shareholder for not longer than 12 months after it has become aware that the person concerned has ceased to be a shareholder.</p>

1. Data controller, data of the data protection officer

Name of data controller: OTP Bank Plc. (registered seat: H-1051 Budapest, Nádor utca 16.; registry number: 01-10-041585; address: OTP Bank Plc., H-1876 Budapest; e-mail: informacio@otpbank.hu; telephone: (+36 1/20/30/70) 3 666 666; website: www.otpbank.hu)
Name of data protection officer: Gázmár Zoárd (address: H-1131 Budapest, Babér u. 9.; e-mail: adatvedelem@otpbank.hu)

2. Data processing and purpose of processing

According to the Identification of shareholders under the Act no. LXVII of 2019 on the encouragement of long-term shareholder engagement and amending certain laws for the purpose of legal harmonization (further as Act of SRD II) the company has the right to identify their shareholders.

On the request of the company or of a third party nominated by the company, the intermediaries – with content and form provided by the EC Implementing Regulation (EU) 2018/2012 as of

3 September 2018 laying down minimum requirements implementing the provisions of Directive 2007/36/EC of the European Parliament and of the Council as regards shareholder identification, the transmission of information and the facilitation of the exercise of shareholders right - communicate to the company the information regarding shareholder identity.

The personal data of a natural person shareholder are processed by the company in order to enable the company to identify its existing shareholders in order to communicate with them directly with the view to facilitating the exercise of shareholder rights and shareholder engagement with the company and to enforce the provisions restricting the exercise of voting rights under the Articles of Association.

3. Legal bases of data processing

Legal bases of data processing is the Act of SRD II § 4(1).

4. Transfer of data

There will be no data transfer.

5. Rights and remedies related to the data processing of the person affected (data subject)

The person affected – based on the Articles 12-21 of General Data Protection Regulation – has right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject and to object to processing as well as the right to data portability.

In case of the infringement of the rights of personal affected determined in the General Data Protection Regulation the person affected has the right to lodge a complaint to data protection officer (his data contained in the Point 1 of this Prospectus).

As data subject you have the following rights:

Right of access

The Data Subject has the right to become aware of all personal data that OTP Bank Plc. processes concerning you. The Data Subject has the right to get the following information:

- the purpose of processing;
- the categories of the personal data processed;
- the recipients or categories of recipients to whom OTP Bank Plc. disclosed or may disclose the Data Subject's personal data;
- the envisaged period for which the personal data will be stored;
- the administrative and judicial authorities, where the Data Subject may lodge a complaint;
- in respect of personal data that has not been provided by the Data Subject, information on the source from which the personal data originate;
- where OTP Bank Plc. will also process the 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.

Upon the Data Subject's request, OTP Bank Plc. shall provide a free copy (once) of the personal data processed. 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.

Please note that OTP Bank Plc. may refuse to make a copy if it would violate the rights and freedoms of others.

Right to rectification

The Data Subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of

the processing, the Data Subject shall have the right to has incomplete personal data completed, including by means of providing a supplementary statement.

Right to erasure

The Data Subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay.

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

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed by OTP Bank Plc.;
- the Data Subject withdraws the consent granted, and there is no other legal basis for processing by OTP Bank Plc.;
- 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;
- where personal data are processed for direct marketing purposes, the Data Subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing;
- OTP Bank Plc. has processed the Data Subject's personal data unlawfully;
- OTP Bank Plc. is required to erase the personal data in order to comply with an obligation imposed on OTP Bank Plc. by law or by a binding legal act of the European Union; or
- the personal data have been collected in relation to the offer of information society services to children.

OTP Bank Plc. shall be under no obligation to erase personal data in cases where processing is lawful. The data processing is required for the following purposes:

- for exercising the right of freedom of expression and information;
- for OTP Bank Plc.'s compliance with a personal data processing obligation imposed on OTP Bank Plc. by law or by a binding legal act of the European Union;
- for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9 (2) as well as Article 9 (3);
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89 (1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing;
- for the establishment, exercise or defence of legal claims.

Right to restriction of processing

The Data Subject shall have the right to obtain from OTP Bank Plc. restriction of processing where one of the following applies:

- 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;
- the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead;
- 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;
- the Data Subject has objected to processing pending the verification whether the legitimate grounds of OTP Bank Plc. override those of the Data Subject.

Right to data portability

You may at any time request that the Data Controller provide your personal data processed on a contractual basis, in a structured, widely used, machine-readable format.

If it is otherwise technically feasible, the Data Controller will transfer the personal data at your request directly to another data controller indicated in your request. The right to data portability under this point does not create an obligation for data controllers to implement or maintain technically compatible data management systems.

In the event that your right to data portability adversely affects the rights and freedoms of others, in particular the trade secrets and intellectual property of others, the Data Controller is entitled to refuse to comply with your request to the extent necessary.

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 concerning him or her which is based on point (e) or (f) of Article 6 (1), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller 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.

Where personal data are processed for direct marketing purposes, the Data Subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. The personal data shall no longer be processed for such purposes.

The Data Subject may exercise his or her right to object by automated means using technical specifications.

Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to the Data Subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

Enforcement of rights

Data subject may turn to the data controller if he/she feels that his/her personal data are violated by the controller.

Complaints may be addressed to the Hungarian National Authority for Data Protection and Freedom of Information (website: <http://naih.hu/>; address: 1055 Budapest, Falk Miksa u. 9-11.; postal address: 1363 Budapest, Pf.: 9; phone: +36-1-391-1400; Fax: +36-1-391-1410; email: ugyfelszolgalat@naih.hu). Data subject may turn to other supervisory authority as well corresponding to his/her residential address.

Procedures may be filed regarding the breach of the data processing regulations at the court against the data processor. Data subject may file his/her claim at the Budapest-Capital Regional Court or at the regional court corresponding to his/her residential address. Data subject may access the list of Hungarian regional courts on the following link: <http://birosag.hu/torvenyszekek>.