

**Sub-Annex 03 of the General Business Regulations for agreements concluded before 15 March 2014: Policy on Complaints of OTP Bank Plc.**

**POLICY ON COMPLAINTS OF OTP BANK PLC.**

OTP Bank Plc. receives, registers and investigates all complaints submitted orally or in writing, in which any complainant (hereinafter referred to as the "Client"), whether or not in a business relationship with the Bank, expresses dissatisfaction with the Bank's products, services or the procedures of any of its organizational units or employees, and complains about the Bank's activities or omissions preceding the conclusion of the agreement or in connection with the performance thereof, the termination of the contractual relationship or thereafter, the settlement of a dispute concerning the agreement. For transactions where OTP Bank Plc. acts as a financial intermediary, the Client may submit any comments regarding the financial performance to OTP Bank Plc., and regarding any product or service purchased, to the merchant or service provider.

In connection with the processing of transactions involving a third-party provider (hereinafter referred to as "TTP"), the Client may submit any comments regarding their account and the financial execution of any payments carried out on the account to OTP Bank Plc., while regarding the service availed, the Client may submit them to the TTP. The third-party service provider concerned is competent to investigate any comments or complaints regarding the TTP.

In the case of complaints concerning subsidiaries, depending on the nature of the complaint and the involvement of OTP Bank Plc., and in view of the Client's other banking agreements, the Bank decides whether to investigate and settle the complaint on its own authority or to transfer it for action to the subsidiary concerned on grounds of competence. The Bank shall inform the complainant if it transfers the complaint on grounds of competence.

Any request made by the Client in relation to an existing agreement, any request for information about banking products or services, any proposal for their improvement or any opinion on them shall not be considered as a complaint.

The provisions of this Policy comply with the Recommendation No. 13/2015 (X.16.) of the National Bank of Hungary (*in Hungarian: Magyar Nemzeti Bank*).

In cases not covered by this Policy, the specific business regulations applicable to the product or group of products prevails.

OTP Bank Plc. shall post this Policy at Bank premises open to Clients and publish it on its website.

**1. HOW TO FILE A COMPLAINT**

Clients can submit complaints to our Bank in the following ways:

Online 0-24 hours

- Via the OTP Bank Plc. website in the contact menu (<https://www.otpbank.hu/portal/hu/Kapcsolat>), in the "I have a complaint" tab)
- In the Internet bank by a mailbox message
- Electronically at the [informacio@otpbank.hu](mailto:informacio@otpbank.hu), at the [information@otpbank.hu](mailto:information@otpbank.hu), or in connection with bank cards at the [reklamacio@otpbank.hu](mailto:reklamacio@otpbank.hu) or in relation to a TPP at the [apicomplaint@otpbank.hu](mailto:apicomplaint@otpbank.hu) email address

By telephone

- On banking days from 8 am to 8 pm on the Central Information Line (which does not require an OTPdirekt telephone administration service agreement) (06 1/30/20/70) 3666 388
- Every day from 0-24:00 hours with an agreement for OTPdirekt telephone administration service on our OTPdirekt telephone assistance service (06 1/30/20/70) 3 666 666
- Call our OTP Bank Card HelpDesk (06 1/30/20/70) 3 666 000 every day from 0-24:00

By letter

- at the address of 1876 Budapest of the Central Complaints Department of OTP Bank Plc.

By telefax

- at fax number (06 1) 3 662 607

At bank branches, through administrators, during opening hours

- In person, orally and in writing
- By document transmitted by another person
- By proxy (using the form available in the branches and on the Bank's website)

The branches and their opening hours are available at the [www.otpbank.hu](http://www.otpbank.hu) website.

OTP Bank Plc. allows clients to use the complaint form published on the website of the National Bank of Hungary (*in Hungarian: Magyar Nemzeti Bank*) (MNB) for submitting written complaints, which form is available at OTP Bank Plc. premises open for Clients as well as the Bank's website.

In the event of a failure of any of the electronic means of contact, clients can submit complaints using the methods listed above.

Depending on the nature and content of the complaint, we will ask the Client to provide the following information for the investigation:

- Name of Client

- Account number of the Client (bank account number/securities account number, etc.)
- Number of the bank card of the Client
- Client's permanent address/ mailing address
- Client's phone number
- Client's email address (if you expect a reply by email)
- Mode of notification
- Product(s), services concerned by the complaint
- Description of, reason for complaint
- Complainant's claim
- Copies of the documents in the Client's possession that are necessary to support the complaint
- For a Client acting by proxy, a valid power of attorney
- Any other data necessary to investigate and respond to the complaint

The employees of OTP Bank Plc. never in any way ask clients for their secret identification codes (e.g. PIN code, TeleCode, 7-digit secret code).

OTP Bank Plc. processes the data of all Clients submitting a complaint in accordance with the applicable rules on the protection of personal data. OTP Bank Plc. provides detailed information on the rights of the complainant regarding the processing of their data, including the possibility of legal remedy, in the "General Privacy Statement" and the "Additional Information on Data Processing for Complaints Handling", in accordance with the provisions of the General Data Protection Regulation and Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information.

## **2. RECEIVING A COMPLAINT**

OTP Bank Plc. investigates complaints in a consumer-friendly manner and strives to handle them efficiently and quickly. When handling complaints, with regard to the rights and obligations of clients arising from the agreement, OTP Bank Plc. acts in compliance with the general framework of the requirement of good faith and fairness and the requirement of the conduct generally expected in the given situation, as laid down by law. Furthermore, it takes as the basis the behaviour of a consumer who is reasonably well informed and acts with due care and diligence as would be expected in the given situation.

The Client may request an appointment by telephone or via the Internet to have a report of their comments taken and for the submission of the related documents at a bank branch at the locations specified in Section 1. An OTP Bank Plc. administrator shall provide information on the offered/accepted appointment by telephone or e-mail.

Where possible, complaints made in person at a branch shall be investigated immediately by OTP Bank Plc. and remedied as necessary.

If the complaint cannot be settled within the normal administration time or the Client does not agree with the verbal information given to them, the complaint and the position of OTP Bank Plc. on the complaint shall be recorded in writing. In such cases, the administrator shall prepare a report of the complaint in OTP Bank Plc.'s notification management system, with the details set out below, print two copies thereof and hand it over to the Client. If the Client agrees with the contents of the report, they return one signed copy to OTP Bank Plc.

The report must include at least the following:

- a) the name of the Client,
- b) the Client's address, registered office and, where applicable, mailing address,
- c) where, when and how the complaint was filed,
- d) the name and address of the service provider concerned in the complaint, a detailed description of the complaint, with each element of the complaint recorded separately, so that all the objections included in the Client's complaint are fully investigated,
- e) the number of the agreement concerned by the complaint, the Client number or the cashier's identification number, depending on the case,
- f) a list of documents, records and other evidence produced by the Client,
- g) the place and time where the report was prepared, and
- h) in the case of complaint made verbally in person, the signatures of the person who prepared the report and the Client.

If the Client does not agree with the contents of the report, they can request a modification of the complaint. In the case of full agreement and after signature, the complaint shall be registered electronically by OTP Bank Plc., where the complaint shall be given an individual identifier.

In the event of a complaint reported by telephone, OTP Bank Plc. shall act as it would normally be expected to in the given situation in order to ensure that a live voice response is given within five minutes of the successful placement of the call. OTP Bank Plc. records the audio material of calls made to the OTP Call Centre and on the telephone numbers provided in the response letter sent by the Central Complaints Department.

Where possible, complaints made by telephone shall be investigated immediately by OTP Bank Plc. and remedied as necessary. Should the Client not agree with the handling of the complaint by telephone or if immediate investigation of the complaint is not possible, OTP Bank Plc. prepares a report of the complaint and its position thereon, and where the complaint was reported by telephone, provides the data for identifying the complaint and notifies the Client of the contact details of the organizational unit henceforth handling the complaint. If the Client approves the content of the report after it is read back, the Bank records it in the Bank's complaint management system. OTP Bank Plc. sends a copy of the report to the Client together with the response to the complaint.

Upon the Client's request, OTP Bank Plc. provides an opportunity for the Client to listen to the audio recording related to the handling of the complaint, and provides the authenticated transcript of the audio recording or a copy of the audio recording free of charge within the time limit set by law, in accordance with the Client's request, as follows:

- a) following indication of the time of the call for calls identified and initiated under the OTPdirekt agreement,
- b) in case of calls not initiated under the OTPdirekt agreement, where OTP Bank Plc. is able to identify the Client beyond doubt:
  - o indication of the name of the call centre agent, the precise duration of the call or
  - o the initiating phone number or the precise duration of the call or
  - o after the call identifier of the telephone conversation concerned has been given.

If the Client does not specify whether they request a transcript of the audio recording or a copy of the audio recording, OTP Bank Plc. sends the audio medium containing a copy of the audio recording to the Client within 25 days.

In order to maintain balance between the position of the Client and OTP Bank Plc., the Client conducting the telephone conversation may also record the conversation. This action of the Client may only serve the same purpose for which OTP Bank Plc. records the conversation. The Client shall inform OTP Bank Plc. of recording the conversation when commencing the conversation.

The Client may not publish the voice recording made by either OTP Bank Plc. or by the Client, and may only use it during a potential legal dispute with OTP Bank Plc.

In case of dispute, OTP Bank Plc. considers the voice recording made by it in all cases.

OTP Bank Plc. keeps the audio recordings of the complaint and of the conversations with the Central Complaints Department regarding the complaint and the response to the complaint for the period specified by law.

If the complaint is received in the form of an electronic mail, the client's soft identification is required. Any client who provides 3 personal details (e.g. name, date and place of birth) and an identifier or data specified in the agreement and relating to the subject of the complaint (e.g. a description of the terms of the contract) shall be considered as soft identified.

After the successful soft identification, OTP Bank Plc. shall send an electronic response message to the client informing them that the complaint has been registered.

In the event of a complaint submitted to OTP Bank Plc. by any means (Internet, telephone, letter, fax, bank branch, mailbox message via OTPdirekt Internet service), for the security of the Client's data, in an electronic reply letter, OTP Bank Plc. may only provide the Client with general information in relation to the content of the Business Regulations and List of Conditions of OTP Bank Plc. which does not

constitute bank/securities secrets. In all other cases, OTP Bank Plc sends its reply containing bank/securities secret information regarding the Client's accounts and agreements, their existence and on specific orders and transactions by post to the Client's mailing address.

OTP Bank Plc. investigates complaints free of charge and does not charge any extra fee.

### **3. REQUEST FOR ADDITIONAL INFORMATION FROM THE CLIENT FOR COMPLAINT HANDLING**

If the complaint does not contain sufficient information for a proper investigation, OTP Bank Plc. may contact the complainant by phone or in writing to provide the missing data and documents substantiating the complaint. Failing this, the complaint may be rejected.

In the case of a telephone call an audio recording is made of all telephone conversations, of which fact the OTP Bank Plc. administrator shall inform the Client at the beginning of the call. In the case of a telephone call, the OTP Bank Plc. employee shall identify the Client at the beginning of the call with a view to data protection factors, in the course of which the Client will be asked questions concerning their personal data contained in the registration systems and the Client's financial habits. To protect client privacy, the administrator shall only ask clients questions about the data concerning the complaint they have submitted after completion of successful client identification.

### **4. REGISTRATION OF THE COMPLAINT**

The Bank shall keep electronic records of complaints, which include:

- the name of the Client,
- the Client's account number (bank account/securities account, etc.), or
- the Client's bank card number,
- the Client's permanent address/ mailing address,
- the Client's telephone number,
- the Client's email address (if they expect a reply by email),
- the method of notification,
- the type of complaint,
- the product(s) or service(s) concerned by the complaint,
- how the complaint was notified,
- the reason for the complaint,
- the claim of the complainant,
- a description of the complaint, designation of the event or fact which is the subject of the complaint, a list of the documents produced,
- the date on which the complaint was lodged, which corresponds to the date of the electronic registration (record),

- the name of the complaint handling officer responsible for investigating the complaint,
- the measures necessary to investigate or settle the complaint, and the reasons for refusal, if applicable,
- the deadline for taking action, and
- the date of posting of the letter responding to the complaint.

## **5. HANDLING OF COMPLAINTS – GENERAL PROCEDURE**

OTP Bank Plc. handles complaints in accordance with the Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises (hereinafter referred to as the “Hpt” or “Banking Act”), Government Decree No. 435/2016 (XII.16.) on the Complaint Management Procedure and Detailed Rules of Complaint Management Policy of Investment Companies, Payments Institutions, Electronic Money Issuers, Voucher Issuers, Financial Institutions and Independent Financial Service Intermediaries and Decree of NBH No. 46/2018 (XII.17.) MNB on the Rules on Complaint Management of Financial Organizations.

In order to ensure a uniform, efficient and high quality customer service, complaints are handled centrally by the Central Complaints Department of OTP Bank Plc, where experts specialised in the given field answer customers' queries. Unless otherwise agreed between OTP Bank Plc. and the client, complaints are handled in Hungarian.

As regards the crediting and investigation of unauthorised payment transactions, the relevant chapter of the "Business Regulations on Payment Services" in force at the time shall apply.

OTP Bank Plc. provides information on the outcome of the investigation of the complaint with a precise, clear and unambiguous statement of reasons, including, where necessary, the exact wording of the relevant contractual terms and conditions and regulations.

In the response letter sent to the complaint, OTP Bank Plc. shall indicate the written and telephone contact details of OTP Bank Plc.

If the Client's complaint concerns more than one product, service or area, the Bank shall endeavour to provide a single letter with all the information necessary to respond to all the complainant's complaints and all the questions raised by the complainant.

OTP Bank Plc. shall review complaints in the light of the circumstances made available to it and known to it.

If the complaint is rejected, OTP Bank Plc. informs the client whether the complaint was aimed at investigating the violation of the consumer protection provisions set out in the Act on the National Bank of Hungary (*in Hungarian: Magyar Nemzeti Bank*) or at settling a dispute related to the conclusion, validity, legal effect and termination of

the agreement, as well as the breach of contract and its legal effects. It also provides information that consumer protection proceedings can be initiated at the Financial Consumer Protection Centre (*in Hungarian: Pénzügyi Fogyasztóvédelmi Központ*) of the National Bank of Hungary (*in Hungarian: Magyar Nemzeti Bank*) (MNB), and in the event of a dispute over an agreement, the client can turn to the Financial Arbitration Board (*in Hungarian: Pénzügyi Békéltető Testület*) (hereinafter referred to as PBT) operated by the MNB or to a court. Any Client who qualifies as a consumer may request that a form for starting a procedure before the MNB Financial Consumer Protection Centre or the PBT be sent to them and in case of rejection of the complaint, OTP Bank Plc. shall inform the Client separately thereof. Any Client who qualifies as a consumer may request that the above forms be sent at any of the customer service contact details of OTP Bank Plc. specified in Section 1. The forms will be sent by OTP Bank Plc. forthwith and free of charge.

If the same Client submits a new complaint with the same content as the complaint previously submitted and rejected by OTP Bank Plc. and OTP Bank Plc. maintains its previous position, it may fulfil its obligation to respond within the statutory deadline by referring to its previous response letter. If the complaint is rejected, OTP Bank Plc. informs the client that their complaint was aimed at investigating the violation of consumer protection provisions and/or at settling a dispute related to the conclusion, validity, legal effect and termination of the contract, as well as the breach of contract and its legal effects and provides the contact details of the MNB Financial Consumer Protection Centre and/or the PBT.

In the case of complaints received regarding the activities of OTP Bank Plc.'s subsidiaries, OTP Bank Plc. shall contact the organization concerned in order to investigate the matter, as a result of which the Client shall receive a response either from the subsidiary or from OTP Bank Plc., depending on the nature and complexity of the complaint.

With the exception of complaints related to payment services, the reasoned position of OTP Bank Plc. shall be sent to the Client by the Central Complaints Department within 30 calendar days of notification of the complaint.

If no response can be provided within 30 calendar days from when the complaint was lodged, OTP Bank Plc. informs the Client of the reason for the delay and, if possible, indicates the expected date of completion of the investigation.

The Central Complaints Department of OTP Bank Plc. shall send its reasoned opinion on any written complaint regarding payment services as such are defined under point 87 of Section 6 (1) and Section 6 (4) of the Banking Act (account management, cash and non-cash payment transactions, issuance of cash substitutes and cash transfers together) to the Client within 15 working days of date when the complaint is reported.

If, for reasons beyond the control of OTP Bank Plc., all elements of the complaint regarding the payment service cannot be answered within 15 working days, OTP Bank Plc. sends a provisional reply to the Client, which includes the reasons for the delay in the substantive reply and the deadline for the final reply. The deadline for sending the final reply shall not be later than 35 working days after the date when the complaint was reported.



When responding, OTP Bank Plc. uses primarily the contact details registered in the account management systems to contact its Clients.

OTP Bank Plc. keeps the complaint and the response to the complaint for the period specified by law.

The Bank may conduct a client satisfaction survey on the complaint investigation process.

OTP Bank Plc. shall appoint a contact person responsible for consumer protection issues, of which it shall duly inform the National Bank of Hungary (*in Hungarian: Magyar Nemzeti Bank*).

## **5.1. SUPPLEMENTARY PROVISIONS FOR BANK CARD COMPLAINTS**

Beyond the general procedure for handling complaints, OTP Bank Plc. acts in accordance with the following additional provisions when handling card complaints.

The definitions, terms and relevant legislation used in Section 5.1 are set out in the Definitions chapters of the Retail Credit Card Business Regulations, Debit Card Business Regulations I (General Provisions), Debit Card Business Regulations II (Retail Debit and Prepaid Cards) and Debit Card Business Regulations Part III (Business Debit Cards) for the card concerned by the complaint.

A card-related complaint may be submitted within 60 days of the date of sending the statement indicating the transaction in question or the expected date of delivery of the goods or services paid for. The expected date of performance must be justified and controllable, therefore the expected date of performance of the paid goods or services must be documented by the Contracting Party/Cardholder. In the case of a return of goods, the complaint shall be submitted within 60 days of the date of the receipt issued by the place accepting the returned goods or the date of the written notification of the credit note from the place accepting the goods. Of the above deadlines, the one that expires at the latest for the specific complaint prevails.

If the Contracting Party or the Cardholder has not been able to report the complaint within the above time limit for reasons beyond their control, they may do so within a limitation period of 13 months from the date of the transaction in question.

OTP Bank Plc. shall in advance credit the complained transaction authorised and settled by the Client within 7 working days after the receipt of the complaint, with the original value date. The credit shall be considered final only if OTP Bank Plc. is satisfied of the legitimacy of the complaint during the investigation and has notified the Contracting Party thereof. The Card Account concerned may not be closed until the investigation of the complaint has been completed on the merits.

In particular, but not exclusively, the Bank shall not grant an advance credit in the following cases:

- a) for transactions not authorised by the Cardholder (in accordance with the Business Regulations on Payment Services),
- b) in the case of a blocked entry, and
- c) where official proceedings are pending in the matter.

If the complaint is rejected, OTP Bank Plc. shall debit the account of the Contracting Party with the amount of the disputed and pre-credited item - without a cover verification - with the original value date.

OTP Bank Plc. also has the right to block the card during the complaint handling procedure also:

- a) if a complaint has been received about a transaction made with the card by telephone, letter or via the Internet,
- b) if it learns that the card has been lost/stolen or misused and that it has not been blocked,
- c) if the Contracting Party or the Cardholder fails to comply with the terms of the card agreement and the applicable laws.

The time limit for handling complaints is 360 days from the date of notification in the case of bank card complaints where OTP Bank Plc. has to follow the procedure of the International Card Organizations.

If no response to such complaints can be provided within 15 working days of the complaint being communicated, OTP Bank Plc. shall inform the client of the reason for the delay and, if possible, indicate the expected date of completion of the investigation.

Where the Contracting Party gives an order for an inter-bank complaint handling procedure which OTP Bank Plc. does not consider justified, the costs of such procedure charged by the International Card Organizations shall be borne by the Contracting Party. The Bank shall inform the Contracting Party of the expected costs of the procedure to be passed on before the procedure is initiated.

In case of a problem with blocked/booked items, OTP Bank Plc. shall be provided with proof of the legitimacy of the release of the blocking/booking (e.g. proof of cash payment, letter from the acceptance place on the unblocking/release of the booking).

No direct cash refund is available at the merchant acceptance place if a complaint about the transaction is accepted. In such cases, the amount in question may be credited to the Card Account through OTP Bank Plc.

OTP Bank Plc. is not a party to any dispute between the Contracting Party / Cardholder and any of the acceptance places that does not directly relate to the use of the card. In such dispute, it is entitled to provide the necessary information and data in accordance with the laws on bank secrets, the terms of the card agreement and the Cardholder's written declaration to this effect.

### **Special provisions for Own-cards and MCO ISIC cards**

OTP Bank Plc. shall not accept complaints about the quality of the photo in the case of Own-cards or the quality of ID Card photo in the case of MCO ISIC cards.

Complaints about the student ID card function of the ISIC card (student ID not accepted, etc.) can be reported by e-mail via the "contact" tab at [www.isic.org](http://www.isic.org) or by calling +44/20 87628110.

### **Special Provisions for Prepaid Cards**

In the case of a Prepaid Card, a complaint may be filed within 30 days from the date of the disputed transaction or event, and thereafter before the termination of the agreement (limitation period).

OTP Bank Plc. shall credit the amount immediately, depending on the outcome of the investigation of the complaint.

### **Special Provisions for Credit Cards**

Filing a complaint shall not mean an exemption from paying the Minimum amount due.

## **6. AVAILABLE REMEDIES**

When handling complaints, OTP Bank Plc. shall act in such a way as to avoid the development of a financial consumer dispute as far as possible given the circumstances.

If the Client disagrees with the response to their complaint, or if they have new information or documentation, they may request a review of the response to the complaint by contacting the Central Complaints Department at one of the contact details specified in Section 1. In such case, investigation of the complaint shall be investigated in a higher decision-making level.

Any Client who qualifies as a consumer and does not accept the response received or considers that OTP Bank Plc. did not handle the complaint properly or rejected it, may submit a written complaint to the Financial Consumer Protection Centre (*in Hungarian: Pénzügyi Fogyasztóvédelmi Központ*) of the MNB, or initiate proceedings before PBT operated by the MNB or before a court of law.

National Bank of Hungary Financial Consumer Protection Centre  
mailing address: 1534 Budapest, BKKP Pf. 777  
telephone: (06 80) 203-776  
e-mail address: [ugyfelszolgalat@mnbb.hu](mailto:ugyfelszolgalat@mnbb.hu)

Financial Arbitration Board  
mailing address: 1525 Budapest, Pf. 172  
telephone: (06 80) 203-776  
e-mail address: [ugyfelszolgalat@mnbb.hu](mailto:ugyfelszolgalat@mnbb.hu)

In the absence of a settlement, the competent council of the PBT may also issue a decision imposing an obligation if the Bank has not made a declaration of submission, but the application is well-founded and the claim to be enforced by the Client who qualifies as a consumer does not exceed HUF 1 million, either in the application or at the time of the decision imposing an obligation.

The forms for initiating the MNB's consumer protection control procedure (financial consumer protection petition) and the forms for initiating the PBT procedure are available on the MNB's website and in our branches. The Client may request the above forms to be sent free of charge at any of the customer service contact of OTP Bank Plc. set forth in Section 1.

Based on Regulation (EU) No 524/2013 of the European Parliament and of the Council of 21 May 2013 on online dispute resolution for consumer disputes (hereinafter referred to as the "Regulation"), the European Commission has set up an online dispute resolution platform.

Under the Regulation, consumers shall be able to use this platform to communicate with service providers established in the European Union to resolve out-of-court disputes between consumers residing in the European Union and service providers established in the European Union concerning contractual obligations stemming from online service agreements.

The scope of the Regulation directly extends to financial service providers established in Hungary, including OTP Bank Plc., in the event of a consumer dispute arising from an online service agreement concluded between the consumer and OTP Bank Plc.

Under the Regulation, consumers can initiate online out-of-court dispute resolution through an online dispute resolution platform at a dispute resolution forum of their choice. In Hungary, PBT is the body authorised to settle financial consumer disputes.

The website of the online dispute resolution platform: <http://ec.europa.eu/odr>

The user guide is available on the website of the online dispute resolution platform: <https://webgate.ec.europa.eu/odr/userguide>

If the complaint of a Client not qualifying as a consumer is rejected or if the statutory time limit for responding to the complaint has expired without result, the Client may take legal action to settle the dispute concerning the conclusion, validity, effects and termination of the agreement, as well as the breach of contract and the effects thereof.

## **SUPPLEMENTARY PRIVACY STATEMENT RELATED TO COMPLAINT HANDLING**

This Privacy Statement is an addendum to Sub-Annex 5 of OTP Bank Plc.'s General Business Regulations concerning data processing (hereinafter referred to as the "General Privacy Statement"), and is specific to data processing carried out during the handling of complaints. This Privacy Statement shall be applied together with the General Privacy Statement.

### **7.1. Data Controller and contacts**

Name of the data controller: OTP Bank Plc. (hereinafter referred to as the "Data Controller")

Registered office: 1051 Budapest, Nádor u. 16

Postal address: OTP Bank Nyrt. 1876 Budapest Központi Panaszkezelési Főosztály [Central Complaints Department]

E-mail address: [informacio@otpbank.hu](mailto:informacio@otpbank.hu)

Phone number: (06 1/30/20/70) 3 666 388

Website: [www.otpbank.hu](http://www.otpbank.hu)

Information of the data protection officer of the Data Controller:

Name: Zoárd Gázmár

Postal address: 1131 Budapest, Babér u. 9

Email address: [adatvedelem@otpbank.hu](mailto:adatvedelem@otpbank.hu)

For handling of complaints with the assistance of data processor(s) (hereinafter referred to as "Data Controller2"),

a) if the complaint relates to assigned receivables

**Name: OTP Faktoring Követeléskezelő Zrt.**

Registered office: 1066 Budapest, Mozsár utca 8

Postal address: 1364 Budapest, Pf: 271

Phone number: 06-1/267-6095

Fax: 06-1/301-0976

Website: [ugyfelszolgalat@otpfakt.hu](mailto:ugyfelszolgalat@otpfakt.hu)

b) if the complaint is also regarding insurance services

**Name: Groupama Biztosító Zrt.**

Registered office: 1146 Budapest, Erzsébet királyné útja 1/C

Postal address: 1380 Budapest, Pf. 1049

Phone number: +36 1467 3 500

Fax: +36 1361 0091

Website: [www.groupama.hu](http://www.groupama.hu)

c) if the complaint is regarding the activities of OTP Ingatlanpont Kft

**Name: OTP Ingatlanpont Kft.**

Registered office: 1052 Budapest, Türr István utca 9, 2nd floor

Phone number: +36 1 3 666 456

Website: [www.otpip.hu](http://www.otpip.hu)

d) if the complaint concerns a loan secured by real estate provided by OTP Jelzálogbank Zrt.

**Name: OTP Jelzálogbank Zártkörűen Működő Részvénytársaság**

Registered office: 1051 Budapest, Nádor u. 21

Postal address: 1364 Budapest, Pf. 280

Phone number: +36 1 3666 666  
Website: [www.otpbank.hu/OTP\\_JZB](http://www.otpbank.hu/OTP_JZB)

e) if the complaint is regarding the activities of OTP Lakáslízing Zrt.

Name: **OTP Ingatlanlízing Zártkörűen Működő Részvénytársaság**  
Registered office: 1012 Budapest, Vérmező u. 4 (MBC Office Building)  
Phone number: +36 1 3666 666  
Website: <http://www.otpingatlanlizing.hu>

f) if the complaint is regarding the home pre-savings fund scheme

Name: **OTP Lakástakarék Zártkörűen Működő Részvénytársaság**  
Registered office: 1051 Budapest, Nádor u. 21  
Postal address: H-1364 Budapest Pf.: 35  
Phone number: +36 1 3 666 888  
Website: [www.otpbank.hu/lakastakarek](http://www.otpbank.hu/lakastakarek)

g) if the complaint is regarding the activities of Merkantil Váltó és Vagyonbefektető Bank Zrt

Name: **Merkantil Váltó és Vagyonbefektető Bank Zártkörűen Működő Részvénytársaság**  
Registered office: 1051 Budapest, József Attila u. 8  
Postal address: 1365 Budapest, Pf.: 676  
Phone number: +36 2 686 868  
Fax: +36 2686 880  
Website: [www.merkantil.hu](http://www.merkantil.hu)

h) if the complaint is regarding the activities of Multipont Program Zrt

Name: **Multipont Program Zártkörűen Működő Részvénytársaság**  
Registered office: 1117 Budapest, Budafoki út 79.  
Website: [www.multipont.hu](http://www.multipont.hu)

i) if the complaint is regarding the activities of OTP Mobil Szolgáltató Kft

Name: **OTP Mobil Szolgáltató Korlátolt Felelősségű Társaság**  
Registered office: 1093 Budapest, Közraktár u. 30-32  
Phone number: +36 1776 6 901  
Fax: +36 1776 6902  
Website: [www.otpmobil.hu](http://www.otpmobil.hu)

j) if the complaint is regarding the activities of OTP Pénztárszolgáltató Zrt.

Name: **OTP Pénztárszolgáltató és Tanácsadó Zártkörűen Működő Részvénytársaság**  
Registered office: 1133 Budapest, Váci út 76  
Website: [www.otpportalok.hu](http://www.otpportalok.hu)

k) if the complaint is regarding the activities of OTP Pénzügyi Pont Kft.

**Name: OTP Pénzügyi Pont Korlátolt Felelősségű Társaság**  
**Registered office: 1138 Budapest, Váci út 135-139 Building "A", 7th**  
floor  
**Website: www.otppp.hu**

(Hereinafter, where this Privacy Statement refers to a "Data Controller", this shall be understood to mean all Data Controllers (i.e. both Data Controller and Data Controller2).)

## **7.2 Processing of Client Data**

### 7.2.1 Scope of Clients

When handling complaints, Data Controllers process the personal data of the following natural persons (hereinafter referred to as "Data Subject"):

- a) Account Holder,
- b) Main card holder,
- c) Partner card holder,
- d) Debtor
- e) Co-debtor
- f) The natural person representing the client or potential client (parent, proxy, legal representative, guardian, witness, registrar, guardian),
- g) Beneficiary of a will in the event of death,
- h) Heir,
- i) Beneficial owner,
- j) Surety
- k) Liquidator, administrator, family administrator, voluntary liquidator,
- l) Pledgor,
- m) Any other natural persons not covered above.

### 7.2.2 Scope of data processed/stored

In addition to the categories of data specified in Section 2 of the General Privacy Statement, OTP Bank Plc. processes the health data provided by the Complainant in their notification and any data provided in connection with the use of third party service providers, as in this case the Data Subject provides such information by an unambiguously expressive act pursuant to Article 4, point 11 of the General Data

Protection Regulation. By providing health data in the notification, the complainant gives their consent to the processing of personal data concerning them.

The exact scope of the data handled/stored in the course of complaint handling is set out in the provisions of the Policy on Complaints and other documents generated in the course of complaint handling.

### 7.2.3 Purposes of the data processing

The Data Controller processes the data defined in Section 7.2.1 in addition to the purposes specified in Section 3 of the General Privacy Statement for the following purposes and in accordance with the following additional provisions:

- Recording, registering, handling and resolving complaints.
- Transferring complaints out of competence and to the subsidiary concerned for action.
- Follow up on complaints for the purpose of:
  - improving products and banking processes based on the facts underlying the complaint,
  - identifying systemic problems and legal risks.
- Telephone calls to obtain feedback on the impact of handling customer notifications.
- Recording of a call made by the complainant by telephone regarding the outcome of the investigation and, in the case of a consumer claim, a call-back request form or complaint log.
- Monitoring and supervising the complaint handling activities and operations of OTP Bank Plc., and ensuring the measures taken to this end in order to respond to supervisory and official requests.

### 7.2.4 Legal grounds for data processing

When handling complaints, the Data Controller processes the personal data based on the legal grounds listed in section 4 of the General Privacy Statement.

The Data Controller processes the personal data specified in Section 7.2.1 primarily on the legal grounds of mandatory data processing. For cases not mentioned previously, this Policy Statement indicates the data group(s) processed based on the given legal grounds.

## **7.3 Recipients of the personal data**

When handling complaints, the recipient of personal data at the Data Controller is the employee who records, investigates and resolves the complaint or supervises the outcome of the investigation. Furthermore, the natural or legal person, public



authority or any other body with whom the personal data are communicated by the Data Controller in connection with the handling of the complaint.

The Data Controller only uses the data processors specified in Annex 2 of the General Business Regulations.

For more information on data processing, please visit [www.otpbank.hu](http://www.otpbank.hu).

#### **7.4. Remedies related to data processing**

As set out in Section 24 of the General Privacy Statement.

**OTP Bank Plc.**