

Customs Desk Service

PRIVACY STATEMENT

This Privacy Statement is an addition to Sub-Annex 5, Annex 2 of OTP Bank Plc.'s General Business Regulations, which deals with data processing, and specifies the terms and conditions of data processing carried out during the **Customs Desk Service**. This Privacy Statement shall be applied together with Sub-Annex 5, Annex 2 of OTP Bank Plc.'s General Business Regulations.

1 DATA CONTROLLER AND CONTACTS

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

Registered office: 1051 Budapest, Nádor utca 16

Mailing address: OTP Bank Plc., 1876 Budapest

Email address: informacio@otpbank.hu

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

Website: www.otpbank.hu

Information of the data protection officer of the Controller:

- a) Name: Zoárd Gázmár
- b) Mailing address: 1131 Budapest, Babér u. 9
- c) Email address: adatvedelem@otpbank.hu

2 PROCESSING OF CLIENTS' DATA

2.1 Scope of Clients

During the provision of the **Customs Desk Service** and the preparation thereof, the Controller processes the personal data of the following natural persons (hereinafter referred to as: Data Subject) during the provision and preparation of the non-retail account keeping and deposit tie-up services:

- a) The authorising natural person
- b) The representative of the authorising natural person (e.g. legal representative, customs agent, car dealer etc.)
- c) The beneficiary natural person

2.2 Scope of the processed data

Besides the data groups defined under items 2.1.a, 2.1.b, 2.1.c, 2.1.e, and 2.1.f of Sub-Annex 5, Annex 2 of the General Business Regulations, the Controller processes Data Subjects' data belonging to the following data groups during the provision and preparation of the **Customs Desk Service**:

a) Data necessary for personal identification and communication:

- a) Client's name:
- b) Client's address:

b) Data necessary for the performance of client's authorisation regarding the provision of customs desk service:

- a) OTP Bank Plc.'s unique identifier for Electronic Bank Messaging Module System (EBÜK) messages
- b) Unique identifier of Electronic Bank Messaging Module System (EBÜK) message
- c) Decision number (shall only contain numbers and letters of the English alphabet)
- d) EORI ID number (registration and identification number of economic party in the European Community providing a common reference for communication with the customs authorities across the whole territory of the Community)
- e) Tax number ("99999999" for natural persons)
- f) Amount deposited
- g) Date of deposit (bank transfer)
- h) Account name to which the deposit occurred
- i) Account number

The exact data processed during the provision and preparation of the **Customs Desk Service** are included in the provisions of the Business Regulations and other documents created during the performance of the agreement.

Other documents:

- a) **For customs transactions through the internet interface:** client and transaction information given on the screen available through the following address, except for information on the bank card to be charged:
<https://www.otpbank.hu/portal/hu/Vam/InternetesVamfizetes>
- b) **For customs transactions in branches providing customs desk service:** client and transaction information given on the authorisation titled "Certification of the payment of customs duties and other public burden" signed by the client.

2.3 Purposes of the processing

The Controller does not process the data defined in section 2.2 for reasons other than those specified in sections 3.1.a, 3.1.b, 3.1.c, 3.1.f, and 3.1.g of Sub-Annex 5, Annex 2 of the General Business Regulations.

2.4 Legal grounds for data processing

The Controller processes the data of the Clients during the provision and preparation of the **Customs Desk Service** based on the legal grounds listed in sections 4.1.a, 4.1.b, 4.1.c, and 4.1.e of Sub-Annex 5, Annex 2 of the General Business Regulations.

2.4.1. Preparing the conclusion of the agreement and performance of the agreement for the provision of the Customs Desk Service

The Controller processes the personal data provided on the internet interface and in the branch providing customs desk service for the purposes of preparing the conclusion of the Agreement and the performance of the Agreement, including the enforcement of rights and claims under the Agreement, and filing legal claims.

2.4.2 Mandatory data processing

The Controller shall not process the personal data of the Data Subjects on the legal grounds of mandatory data processing for legal obligations other than those specified in sections 7.1, 7.2, 7.3, 7.4, 7.6, and 7.9 of Sub-Annex 5, Annex 2 of the General Business Regulations.

2.4.3 The Controller's legitimate interest

The Controller shall not process the Data Subjects' personal data specified in section 2.2 besides the legitimate interests specified in sections 8.2 and 8.3 of Sub-Annex 5, Annex 2 of the General Business Regulations.

2.4.4 Consent of the Client

Personal data is processed for the purpose of **providing Customs Desk Service** in addition to the Controller's legitimate interest and based on the consent (voluntary and unambiguous expression of will based on actual and adequate information) of the Data Subject and their representative. The consent is a mandatory element for both channels of service.

- a) **For customs transactions through the internet interface:** the client makes a declaration before initiating the transaction:

<https://www.otpbank.hu/portal/hu/Vam/InternetesVamfizetes>

- b) **For customs transactions in branches providing customs desk service:** The client accepts the declaration by signing it on the authorisation titled "Certification of the payment of customs duties and other public burden" signed by the client.

Consent can be given voluntarily, and Client is entitled to withdraw their consent at any time without restrictions by a notification sent to the Controller. This notification can be sent by the Data Subject to any of the addresses listed under section 1 of this Statement.

The withdrawal of the consent has no consequences regarding the Client. The withdrawal of consent, however, does not affect the legitimacy of the data processing—carried out based on the consent—before the withdrawal.

2.5 Automated decision making, including profiling for the same reason

The Controller does not make any automated decisions in relation to this data processing.

3 RECIPIENTS OF THE PERSONAL DATA

Except for public authorities specified by law or the European Union's legally binding instrument who request personal data from OTP Bank Plc. for investigating individual cases, the Controller does not forward Data Subjects' personal data to third parties and organisations.

Besides the data processors specified in Annex 2 of the General Business Regulations, the Controller uses the following data processors:

Monicomp Kereskedelmi és Szolgáltató Ltd.

Address: 1139 Budapest, Petneházy u. 46.

Telephone number: (1) 452 9000

Fax: +36 (1) 452 9002

Email address: kapcsolat@monicomp.hu

Activity as data processor: Monicomp Zrt. cooperates as data processor in the preparation and mailing to clients of certifications of customs desk deposits made by our clients through the internet.

The Controller shall not forward Data Subject's data to third countries or international organisations other than the states of the European Economic Area (that is the states of the European Union, Iceland, Norway, and Lichtenstein) when forwarding the personal data to the Data Processor.

Budapest, 15 November 2019