

OTP Bank Plc.

Supplemental Data Processing Information Notice

REGARDING RETAIL DEBIT CARDS

This Data Processing Information Notice is a supplement to Annex 5 on data processing of the General Business Regulations of OTP Bank Plc. (hereinafter “General Privacy Notice”), regarding the specification of the terms of data processing performed during the provision of retail debit card services. This Data Processing Information Notice is to be applied together with the General Privacy Notice.

1 CONTROLLER AND ITS CONTACT DETAILS

1.1 Controller’s name: OTP Bank Plc. (Controller)

Registered office: H-1051 Budapest, Nádor u. 16, Hungary

Postal address: OTP Bank Nyrt. 1876 Budapest

Email: informacio@otpbank.hu

Telephone: (+36 1/30/20/70) 3 666 388

Website: www.otpbank.hu

Details of the Controller’s data protection officer:

Name: Zoárd Gázmár

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

Email: adatvedelem@otpbank.hu

Additional controller involved in joint data processing if the retail debit card services are combined with insurance services, solely in relation to personal data processed for the insurance relationship

Name: Groupama Biztosító Zrt. (Groupama Insurance, hereinafter: “**Controller2**”)

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

Postal address: 1380 Budapest, Pf. 1049

Telephone: +36 1 467 3500

Fax: +36 1 361 0091

Website: www.groupama.hu

The notices on joint data processing are available at the branches and on the Bank’s website (www.otpbank.hu).

2 PROCESSING OF THE DATA OF CUSTOMERS

2.1 Scope of Customers

During the provision of retail debit card services or when preparing to provide such services, the Controller processes the personal data of the following natural persons (hereinafter “Data Subject”):

- primary cardholder,
- additional cardholder,

2.2 Scope of data processed

During the provision of retail debit card services or when preparing to provide such services, in addition to the data groups specified in Section 2 of the General Privacy Notice, the Controller processes the following groups of data about the Data Subjects:

- data related to card use,
- transaction data underlying the Multipont Mastercard Premium Card discount and
- data accessed by the Controller during the performance of the contract for the purposes of preventing, detecting and investigating fraud committed with retail debit cards.

The exact set of card usage data processed during the provision of retail debit card services or when preparing to provide such services is available:

- in the General Privacy Notice, and
- on the online account or card application pages of the website www.otpbank.hu,
- in the Bank card application menu item of the OTPdirekt internet service,
- in the data disclosed in the application process via the OTPdirekt call centre, the Bankcard HelpDesk service or the Central Information Line,
- in the Account and Card Contract forms relating to the relevant payment account or in the Account and Card Contract Amendment forms
- in other documents generated during the performance of the contract aimed at providing retail debit card services, and
- in the supplemental data processing information notice on bank account contracts.

Data related to card use:

- Card number and account number
- Cardholder’s customer number
- Cardholder’s card name
- Card limits and other settings
- card status change dates
- photo image (for Mastercard Standard Private Cards, Mastercard Online Private Cards, Mastercard Online Junior Private Cards and Mastercard Online Junior Start Private Cards)
- passport photo (for Mastercard Online ISIC Cards and Mastercard Online ISIC Junior Cards)

2.3 Purposes of processing

In addition to the purposes specified in Section 3 of the General Privacy Notice, the Controller processes the data defined in Section 2.2 hereof for the following purposes or with the following supplements to the provisions of the General Privacy Notice:

- the detection and prevention of the items set out in Section 3.1. c) of the General Privacy Notice, especially fraudulent customer behaviour damaging the Bank's interests,
- the management and analysis of risks *relating to data* relating to the results of debt collection by the assignee and *the procedure* relating to the assigned receivables in the event of assigning a receivable, as a special item in Section 3.1. c) of the General Privacy Notice,
- verification of eligibility for retail debit card discounts,
- prevention, detection and investigation of payment fraud.

During the present data processing, the Controller does not carry out data processing for the purposes listed in Section 3.1 (e) of the General Privacy Notice.

2.4 Legal bases for processing

When providing retail debit card services or in preparation for the provision of such services, the Controller processes the Data Subject's data based on the legal bases listed in Section 4 of the General Privacy Notice.

The Controller processes the personal data specified in Section 2.2 primarily on the basis of preparations for contracting and contract performance. In other cases, the data categories processed on the legal basis concerned are specified in this Information Notice.

2.4.1 Preparations for the conclusion of contracts for the provision of retail card services and the performance of such contracts

The Controller processes the personal and card usage data obtained by it

- during face-to-face transacting,
- on the online account application platform available at the website www.otpbank.hu,
- via the OTPdirekt call centre, the Bankcard HelpDesk service or the Central Information Line,
- in the Bank card application menu item of the OTPdirekt internet service,
- in the Account and Card Contract forms relating to the relevant payment account or in the Account and Card Contract Amendment forms

as well as any other data accessed by it during the performance of the Contract for the purposes of preparing for contracting and for performing the Contract, including the enforcement of the rights and claims arising from the Contract and the submission of legal claims.

To achieve the above purpose, the Controller performs, in particular, the following:

- identification of the Data Subject based on personal identification data in order to prepare the contract,
- processing of the contact details of the Data Subject for the purposes of communication during the preparation and performance of the Contract,
- analysing personal and transaction data to verify eligibility for discounts.

The detailed conditions for providing the services under the Agreement are set out in the Debit Card Business Regulations (hereinafter: Business Regulations) and the documents referred to therein.

2.4.2 Mandatory processing

Beyond the legal regulations listed in Section 7 of the General Privacy Notice, the Controller processes data in accordance with the following during the present data processing:

- Pursuant to Act LXXXV of 2009 on the Pursuit of the Business of Payment Services, the Controller shall process the personal data provided for in Section 2.2, therein especially any data accessed by it in order to prevent, detect and investigate retail debit card fraud for the purpose of preventing, detecting and investigating payment fraud.

2.4.3 The legitimate interests of the Controller

In addition to the legitimate interests specified in Section 8 of the General Privacy Notice, the Controller shall process the personal data of Data Subjects specified in Section 2.2 based on the following legitimate interests.

The Controller shall keep records of confirmed past fraud events and confirmed fraud attempts associated with the Data Subject. It shall also keep on record historic data suggesting the manipulation or other misuse of data. The Controller processes the data in its records based on its legitimate interest of rating the Data Subject for future transactions, performing analyses and complying with other obligations.

The Controller shall process such data for a period of five years of becoming aware of such actual or attempted fraud.

2.5 Automated decision-making, including profiling for this specific purpose

During the provision of Multipont Mastercard Premium Card services, the Controller may process the Data Subject's personal data for the purposes of concluding and performing the Contract between the Data Subject and the Controller also in automated data processing resulting in a decision of approving or rejecting a Multipont Mastercard Premium Card discount for the Data Subject.

In the course of the above automated decision-making, the Controller shall use the Data Subject's data necessary for concluding the contract for retail debit card services and for the performance of such contract, including especially:

- card use data
- transaction data

in accordance with the following: The Controller shall aggregate a predefined personal data via automated data processing by computer equipment in order to establish eligibility for discounts.

The logic used in the automated decision-making process, i.e. the rules for calculating purchase turnover, are set out in the special provisions chapter V.3 on Multipont Mastercard Premium Cards in Part II on Retail debit and prepaid cards in the Debit Card Business Regulations.

Automated decision-making and profiling:

- has the following purpose: granting of discounts
- scope of the data processed for this purpose:

- card use data
- transaction data
- the resulting legal impact on the Data Subject: applying the Multipont Mastercard Premium Card discount (the annual fee is waived) or rejecting it (the annual fee is charged).

The Controller shall notify the Data Subject about the results of the automated decision-making.

3 RECIPIENTS OF PERSONAL DATA

In addition to requests of personal data from OTP Bank Plc. for individual investigations by public authorities specified by the law and the European Union's legally binding acts, the Controller transfers the Data Subjects' personal data to the following third parties and organisations:

- Groupama Biztosító Zrt. (a joint controller with the Controller if the retail debit card services are combined with insurance services)
- BISZ Zrt. (independent controller)
- Multipont Program Zrt. (independent controller)
- Mastercard Europe SA. (independent controller)

Within the scope of its operations as credit institution, the Controller will exclusively use the processors specified in Annex 2 of the General Business Regulations.

This Data Processing Information Notice enters into force on *28 October 2019*.

Upon the entry into force of this Data Processing Information Notice, the Supplemental Data Processing Information Notice regarding Retail Debit Cards effective since *1 September 2019* shall be repealed.

Budapest, *20 October 2019*