

# **OTP Bank Plc.**

## **Supplemental Data Processing Information Notice**

### **REGARDING BUSINESS 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 business 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](mailto:informacio@otpbank.hu)

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

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

#### **2 PROCESSING OF THE DATA OF CUSTOMERS**

##### **2.1 Scope of Customers**

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

- cardholder
- contracting party (if the customer is a natural person engaged in economic activities)

##### **2.2 Scope of data processed**

During the provision of business 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 data concerning Data Subjects which belong to the following data groups:

- data related to card use and

- data accessed by the Controller during the performance of the contract for the purposes of preventing, detecting and investigating fraud committed with business debit cards.

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

- in the General Privacy Notice, and
- on the online account application platform available at the website [www.otpbank.hu](http://www.otpbank.hu),
- in the Data Sheet constituting a part of the Business Card Contract,
- in other documents generated during the performance of the contract aimed at providing business debit card services, and
- in the data processing information notice supplementing the Business Regulations on Payment Services.

Data related to card use:

- Card number and account number
- Cardholder's and contracting party's customer number
- Cardholder's and contracting party's card name
- Limits and other settings
- card status change dates

### **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,
- 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 business debit card services or when preparing to provide such services, the Controller processes the Data Subjects' data based on the legal grounds 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 business debit card services and the performance of such contracts**

The Controller processes the personal and card use data provided in the Data Sheet constituting a part of the Business Card Contract and the online account application platform available via the [www.otpbank.hu](http://www.otpbank.hu) website as well as the 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.

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 business 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 Cardholder. 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 Cardholder 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.

### **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. (*independent controller, in the case of insurance services associated with business debit card services*)
- BISZ Zrt. (*independent controller*)
- Mastercard Europe SA. (*independent controller*)
- VISA Europe Limited (*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 *2 May 2022*.

Upon the entry into force of this Data Processing Information Notice, the Supplemental Data Processing Information Notice regarding Business Debit Cards effective since *28 October 2019* shall be repealed.

Budapest, *2 March 2022*