

PRIVACY NOTICE
on personal data processing regarding international tax agreements

Data are processed in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (General Data Protection Regulation), Act CXII of 2011 on the Right of Informational Self-Determination and on the Freedom of Information (Privacy Act), as well as other applicable legal regulations, in particular Act XXXVII of 2013 on Certain Rules of International Public Administration Cooperation Related to Taxes and Other Public Duties (Tax Cooperation Act), Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises (Credit Institutions Act) and Act XIX of 2014 (FATCA Act).

OTP Bank Plc. (registered office: H-1051 Budapest, Nádor u. 16.; hereinafter: "Bank" or "Company") shall in each case ensure the lawfulness and purpose limitation of processing regarding the personal data it processes.

1. NAME AND CONTACT DETAILS OF THE CONTROLLER

Controller's name: OTP Bank Plc.
Registered office: H-1051 Budapest, Nádor utca 16.
Postal address: OTP Bank Plc., H-1876 Budapest
E-mail: informacio@otpbank.hu
Telephone number: (+36 1/20/30/70) 3 666 666
Website: www.otpbank.hu

2. THE FOLLOWING TABLE SUMMARISES THE MAIN FEATURES OF DATA PROCESSING UNDER THIS PRIVACY NOTICE

PURPOSE OF PROCESSING	LEGAL BASIS FOR PROCESSING	DATA SUBJECTS AND SCOPE OF THE DATA PROCESSED	DURATION OF PROCESSING
Recording of tax residence declaration, tax residency status check.	Compliance with the legal obligation pursuant to Article 6 (1) (c) of the General Data Protection Regulation	<p>In the case of natural person:</p> <ul style="list-style-type: none"> - surname and forename; - surname and forename by birth; - mother's birth name; - place and date of birth; - residential address or mailing address; - nationality; - phone number; - country(ies) of tax residence; - foreign tax identification number(s) <p>In the case of beneficial owner(s) of a legal person or an unincorporated organisation:</p> <ul style="list-style-type: none"> - surname and forename; - place and date of birth; - residential address; - country(ies) of tax residence; - nationality; - foreign tax identification number(s) 	<p>In the case of an established legal relationship:</p> <p>Eight years from the termination of the business relationship.</p> <p>In the case of a legal relationship not established:</p> <p>180 days from the receipt of a statement related to tax identity, from the identity check.</p>
Informing the client in writing of the conduct of a tax residency status check and of the data provision and reporting obligations of the Controller.	Compliance with the legal obligation pursuant to Article 6 (1) (c) of the General Data Protection Regulation	<p>The data controller's natural person client, and a legal person or an unincorporated organisation, who is tax resident of the relevant state / U.S.</p> <p>In the case of natural person:</p> <ul style="list-style-type: none"> - surname and forename; - residential address or mailing address 	<p>Eight years from the termination of the business relationship.</p>

Please note that only the personal data listed in the table may be processed for the purposes set out above. However, it may occur that not all of the personal data listed above are processed for a given client, but only a part of thereof. The exact content of the data reporting for the various cases and the indicators on which they are based can be found in the "Reporting to the NTCA and the U.S. tax authority (IRS)" and "Reporting to the tax authority of a Participating Jurisdiction" sections of the following announcements available on the Bank's website.

The Bank's FATCA and CRS/ DAC2 Notices for retail and corporate clients are available at the following links: <https://www.otpbank.hu/portal/en/retail>, <https://www.otpbank.hu/portal/en/corporate>

3. CONTACT DETAILS OF THE DATA PROTECTION OFFICER

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

E-mail: adatvedelem@otpbank.hu

4. RECIPIENTS OF PERSONAL DATA

Recipient shall mean a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not.

4.1. DATA TRANSFERS

The personal data specified in Section 2 of this Notice are reported to the NTCA on an annual basis, with the data content specified in the Tax Cooperation Act and FATCA Act. The data covered by data reporting are transmitted by the NTCA through the automatic information exchange regime to the tax authority(ies) of the participating jurisdiction(s) in which the clients concerned are tax residents.

Additional information and the list of participating jurisdictions are available on the Controller's website in the DAC2/CRS and FATCA Notices: <https://www.otpbank.hu/portal/en/retail>, <https://www.otpbank.hu/portal/en/corporate>

RECIPIENT OF THE DATA TRANSFER	DATA CONCERNED BY THE DATA TRANSFER	PURPOSE OF THE DATA TRANSFER
National Tax and Customs Administration (NTCA)	<p>In the case of natural person:</p> <ul style="list-style-type: none"> - surname and forename; - place and date of birth; - residential address or mailing address; - country(ies) of tax residence; - foreign tax identification number(s); - account details and balance <p>In the case beneficial owner(s) (controlling person) of a legal person or an unincorporated organisation:</p> <ul style="list-style-type: none"> - surname and forename; - place and date of birth; - residential address; - country(ies) of tax residence; - foreign tax identification number(s) - the role based on which he/she qualifies as a beneficial owner 	Fulfillment of data reporting obligations.

5. SOURCE OF PERSONAL DATA

In cases where the data subject provides personal data to the Data Controller as part of a declaration/form, the source of the personal data is the data subject.

There may be cases where, in the context of making a declaration, thus the data subject (authorized representative) making the declaration provides personal data regarding another data subject (e.g. beneficial owner). In these cases, the source of personal data is not directly the data subject.

6. SECURITY OF PERSONAL DATA

The IT systems and other data storage facilities of our Company are located at its registered seat and on the servers leased by the processor. Our Company selects and operates the IT tools applied for the processing of personal data during the provision of the service in such a way that the data processed are:

- accessible for the authorised persons (availability);
- credible and authenticated (authenticity);
- verifiably unchanged (data integrity);
- protected from unauthorised access (confidentiality).

We take particular care to ensure data security and take all technical and organisational measures and adopt procedural rules required for enforcing the safeguards specified in the General Data Protection Regulation. We take appropriate measures to protect the data from unauthorised access, alteration, transfer, public disclosure, deletion or destruction, as well as damage and accidental loss, and ensure that the data stored cannot be corrupted or rendered inaccessible due to any changes in or modification to the applied technique.

The information systems of our Company and our partners are both protected from computer-assisted fraud, computer viruses, hacking and distributed denial-of-service attacks. Moreover, the operator ensures security by means of server-level and application-level security procedures. Data are backed up on a daily basis. Our Company takes all possible measures to avoid personal data breaches and in the event of a data breach, it takes action immediately to minimise any risks and eliminate any damage, in accordance with our incident management regulations.

7. RIGHTS OF DATA SUBJECTS IN CONNECTION WITH THE PROCESSING

Pursuant to Articles 12–22 of the General Data Protection Regulation, data subjects may request from the controller access to, rectification or erasure of their personal data as well as the restriction of processing; moreover, they have the right to withdraw their consent or object to the processing.

In the event of a violation of their rights defined in the General Data Protection Regulation, data subjects may lodge a complaint with the Controller at the contact details specified in Clauses 1 and 3.

In accordance with Article 12 (3) of the General Data Protection Regulation, the Company shall fulfil the data subject's request to exercise his or her rights without undue delay, but within one month of receipt of the request in any event. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The Company shall inform the data subject of the extension of the deadline within one month of receipt of the request, stating the reasons for the delay.

Where the data subject makes the request by electronic form means, the response shall also be provided by electronic means where possible, unless requested otherwise by the data subject, with the requested form specifically indicated in his or her request.

7.1. RIGHT OF ACCESS

The data subject shall have the right to request from the Company - using the contact details provided in this Notice - information as to whether or not personal data concerning him or her are being processed, and, where that is the case, to be informed as to:

- which personal data are processed on what legal basis, for what processing purposes and for how long;
- to whom, when, pursuant to which legislation and to which personal data it has provided access to or to whom it has transmitted personal data, and from which source the personal data have been obtained;
- whether it applies automated decision-making and if so, the logic involved, including profiling.

The first time, at the data subject's request, the Company shall provide a copy of the personal data constituting the subject of processing free of charge and subsequently, in accordance with Article 12(5) of the General Data Protection Regulation, where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the Company may charge a reasonable fee, taking into account the administrative costs of providing information or it may refuse to act on the request.

In order to comply with data security requirements and to protect the rights of the data subject, the Company is required to confirm the identity of the data subject or the identity of the person wishing to exercise the right of access; consequently, the provision of information or access to the data, or the issue of a copy of the data is subject to the identification of the data subject.

7.2. RIGHT TO RECTIFICATION

Via the contact details provided in this Notice, data subjects may request the Company in writing to modify or rectify their personal data, provided that they can credibly confirm the accuracy of the rectified data. If they send the request to the Company by electronic means, the Company shall also respond electronically. If they wish to receive the response in any other way, they need to indicate that in the request.

7.3. RIGHT TO RESTRICTION (BLOCKING) OF PROCESSING

Via the contact details provided in this Notice, data subjects may request that the Company restrict the processing of their personal data (by clearly marking the processing operation as restricted and by ensuring that all other data are processed separately) if:

- they contest the accuracy of their personal data (in which case the Company shall restrict processing for the duration of verifying the accuracy of the personal data);
- they believe that the processing is unlawful, but the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the controller 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; or
- the data subject objects to the processing (in which case the restriction shall be in place for the period of verifying whether the legitimate grounds of the controller override those of the data subject).

7.4. DATA PORTABILITY

You shall have the right to receive the personal data concerning you and made available by you to the Company in a structured, commonly used and machine-readable format and have the right to transfer those data to another controller without hindrance from the Controller, if:

- the processing is based on consent or a contract; and
- the processing is carried out by automated means.

7.5. RIGHT TO ERASURE ('RIGHT TO BE FORGOTTEN')

Data subjects may request in writing via the contact details provided in this Notice that the Company erase their personal data.

The Company shall be required to erase your personal data without undue delay where any one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you have withdrawn your consent and there is no other legal ground for the processing;
- the legal basis for processing is a legitimate interest, a public interest or the exercise of official authority, and there are no overriding legitimate grounds for the processing; or
- where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for such purposes;
- the personal data have been unlawfully processed.

7.6. RIGHT TO JUDICIAL REMEDY

If data subjects believe that the data protection rules in effect have been infringed by the Company as a result of the processing of their personal data, they may lodge a complaint with the National Authority for Data Protection and Freedom of Information (address: H-1055 Budapest, Falk Miksa utca 9–11.; Postal address: H-1363 Budapest, Pf.: 9; Phone: +36 1 391 1400; E-mail: ugyfelszolgalat@naih.hu). Data subjects are also entitled to lodge a complaint with other regulators; thus, in particular, with the supervisory authority in the Member State of their habitual residence.

Court proceedings may also be brought against the Controller for the violation of the rules applicable to the processing of personal data. The data subject may bring the case before the Budapest-Capital Regional Court or the court of law having jurisdiction over his/her place of residence. The contact details of the courts in Hungary are available at the following link: <http://birosag.hu/torvenyszekek>. If the habitual residence of the data subject is located in another Member State of the European Union, the proceedings may be brought before the courts with competence and jurisdiction in the Member State of his/her habitual residence.

Budapest, 1 January 2026