

PRIVACY NOTICE

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 (hereinafter: "GDPR" or "General Data Protection Regulation") and Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter: "Privacy Act").

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

The purpose of the Privacy Notice is for OTP Bank Nyrt. to comply with the provisions of Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (hereinafter: "AML Act") and for the data subjects to receive complete information on the processing of their personal data in the course of obtaining the declarations required by the "CEO Order on the prevention and combating of money laundering and terrorist financing and on the implementation of financial and asset-related restrictive measures ordered by the European Union and the UN Security Council.

In the course of preventing and combating money laundering and terrorist financing, one of the Bank's main obligations is to carry out customer due diligence measures, the purpose of which is to get to know the customer and the business relationship, and to eliminate the customer and suspicious transactions that do not fit the customer profile.

This Notice shall remain in effect until revoked. OTP Bank Nyrt. reserves the right to amend this Privacy Notice, and shall arrange for the relevant notification to this end by publishing the amended Notice on the website and in Regula Repository of Regulatory Documents, as an annex to the CEO Order on the prevention and combating of money laundering and terrorist financing and on the implementation of financial and asset-related restrictive measures ordered by the European Union and the UN Security Council.

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
Phone number: (+36 1/20/30/70) 3 666 666
Website: www.otpbank.hu

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

PURPOSE OF DATA PROCESSING	LEGAL BASIS FOR PROCESSING	SCOPE OF THE DATA PROCESSED	DURATION OF PROCESSING
Customer identification	Compliance with the legal obligation according to Article 6(1)(c) of the GDPR, the fulfilment of which is required by Section 7(1)-(2) and (5) of the AML Act.	<p>In the case of a customer who is a natural person or a legal person or an organisation without legal personality, the person entitled to act in its name or on its behalf:</p> <ul style="list-style-type: none"> • last name and first name • last name and first name at birth, • place and date of birth, • mother's maiden name, • citizenship; • registered address, or, in the absence thereof, place of stay • identification document number, type¹ and expiration date 	Under Sections 56(1)-(2) and 57(1)-(2) of the AML Act, 8 years
Making copies of documents presented for customer identification.	Fulfilment of the legal obligation according to GDPR Article 6(1)(c), the fulfilment of which is stipulated by Sections 7(1)-(2), 7(3)(a)(aa) and (ab), and 8(a) of the AML Act.	<ul style="list-style-type: none"> • in the case of Hungarian citizens, the official identity card and official address card; the latter if the person's domicile or place of stay is in Hungary, • in the case of foreign citizens, their travel document or identity card, provided that it entitles them to stay in Hungary, their document certifying right of stay or authorisation for stay, Hungarian official address card, if their domicile or place of stay is in Hungary; 	Under Sections 56(1)-(2) and 57(1)-(2) of the AML Act, 8 years
Recording of data in the case of transaction orders that do not reach the value limit for customer due diligence, and in the case of currency exchange in the amount of one hundred	Compliance with the legal obligation according to Article 6(1)(c) of the GDPR, the fulfilment of	<ul style="list-style-type: none"> • last name and first name, • place and date of birth, • mother's maiden name, 	Under Sections 56(1)-(2) and 57(1)-(2) of the AML Act, 8 years

¹ In the case of Hungarian citizens, the accepted document is an official identification document (identity card, passport, new type of driving licence card) and if his/her domicile or place of stay is in Hungary, the official address card, a foreign natural person's travel document (e.g. passport) or identity card, provided that it entitles its holder to stay in Hungary, or a document certifying right of stay or authorisation for stay, and, if the person's domicile or place of stay is in Hungary, the official Hungarian address card.

thousand forints or more, but not reaching three hundred thousand forints.	which is required by Section 14(1) and Section 7(5) of the AML Act. Furthermore, legitimate interest under Article 6(1)(f) of the GDPR	<ul style="list-style-type: none"> • identification document number and type (identity card, passport, card format driver's license) and expiration date • subject and amount of the transaction order. 	
Recording the personal data of the beneficial owner (in the case of natural person customers).	Compliance with the legal obligation according to Article 6(1)(c) of the GDPR, the fulfilment of which is required by Section 8(1)-(2) of the AML Act.	For the beneficial owner: <ul style="list-style-type: none"> • last name and first name, • last name and first name at birth, • citizenship; • place and date of birth, • registered address, or, in the absence thereof, place of stay. 	Under Sections 56(1)-(2) and 57(1)-(2) of the AML Act, 8 years
Examination of the status of the beneficial owner as a politically exposed person, a close relative of a politically exposed person, or a person closely related to a politically exposed person.	Compliance with the legal obligation according to Article 6(1)(c) of the GDPR, the fulfilment of which is required by Sections 8(3) and 4(1)-(4) of the AML Act.	Does he/she qualify as a politically exposed person, a close relative of a politically exposed person, or a person closely related to a politically exposed person? If yes, under which article of the AML Act does he/she qualify as a politically exposed person?	Under Sections 56(1)-(2) and 57(1)-(2) of the AML Act, 8 years
Recording the personal data of the beneficial owner (in the case of legal persons or organisations without legal personality)	Compliance with the legal obligation according to Article 6(1)(c) of the GDPR, the fulfilment of which is required by Section 9(1) of the AML Act.	<ul style="list-style-type: none"> • last name and first name, • last name and first name at birth, • citizenship, • place and date of birth, • domicile, or, in the absence thereof, place of stay, • nature and extent of the ownership interest. 	Under Sections 56(1)-(2) and 57(1)-(2) of the AML Act, 8 years
In the case of legal persons or organisations without legal personality, the examination of the status of the beneficial owner as a politically exposed person, a close relative of a politically exposed person, or a person closely related to a politically exposed person, the recording of the statement.	Compliance with the legal obligation according to Article 6(1)(c) of the GDPR, the fulfilment of which is required by Section 9(2) of the AML Act.	Beneficial owner: Does he/she qualify as a politically exposed person, a close relative of a politically exposed person, or a person closely related to a politically exposed person? If yes, under which article of the AML Act does he/she qualify as a politically exposed person?	Under Sections 56(1)-(2) and 57(1)-(2) of the AML Act, 8 years
Recording of a statement of a natural person as a	Compliance with the legal	Does he/she qualify as a politically exposed person,	Under Sections 56(1)-(2) and

<p>politically exposed person, a close relative of a politically exposed person, or a person closely related to a politically exposed person.</p>	<p>obligation according to Article 6(1)(c) of the GDPR, the fulfilment of which is required by Sections 9/A(1) and 4(2)-(4) of the AML Act.</p>	<p>a close relative of a politically exposed person, or a person closely related to a politically exposed person? If yes, under which article of the AML Act does he/she qualify as a politically exposed person?</p>	<p>57(1)-(2) of the AML Act, 8 years</p>
<p>Recording of the statement of a politically exposed person, a close relative of a politically exposed person, or a person closely related to a politically exposed person (in the case of a customer who is a legal entity or a customer with no legal personality, the beneficial owner) regarding their funds and the source of their wealth.</p>	<p>Compliance with the legal obligation according to Article 6(1)(c) of the GDPR, the fulfilment of which is required by Sections 9/A(2) and 16/A of the AML Act, and Section 6/A and Annex 3 of Decree 21/2017 (VIII. 3.) NGM.</p>	<p>Information on the funds and source of wealth of a politically exposed person, a close relative of a politically exposed person, or a person closely related to a politically exposed person:</p> <ul style="list-style-type: none"> • in the value of at least HUF 3 million, separately indicating for the specified asset groups the size categories corresponding to the total value as per the value estimated by the customer): • Real estate property (property share included) • Vehicle • Other high-value movable assets • Intangible assets and concessions, licenses and similar rights, in particular right to use intellectual property, lease right • Accounts receivable from financial institutions, securities, other funds, virtual currency • Cash • Estimated market value of ownership shares in companies • Declaration on debts • Declaration on income • Name and position of the declarant authorised representative (for legal persons or other organisations without legal personality.) 	<p>Under Sections 56(1)-(2) and 57(1)-(2) of the AML Act, 8 years</p>

<p>In the case of customers from high-risk countries, the recording of a declaration regarding the funds and the source of the wealth.</p>	<p>Compliance with the legal obligation according to Article 6(1)(c) of the GDPR, the fulfilment of which is required by Sections 16/A(1)(a)(ac) and 16(3)(a) of the AML Act, and Section 6/A and Annex 3 of Decree 21/2017 (VIII. 3.) NGM.</p>	<p>Information about the customer's and the beneficial owner's funds and the source of their assets:</p> <ul style="list-style-type: none"> • in the value of at least HUF 3 million, separately indicating for the specified asset groups the size categories corresponding to the total value as per the value estimated by the customer): • Real estate property (property share included) • Vehicle • Other high-value movable assets • Intangible assets and concessions, licenses and similar rights, in particular right to use intellectual property, lease right • Accounts receivable from financial institutions, securities, other funds, virtual currency • Cash • Estimated market value of ownership shares in companies • Declaration on debts • Declaration on income • Name and position of the declarant authorised representative (for legal persons or other organisations without legal personality.) 	<p>Under Sections 56(1)-(2) and 57(1)-(2) of the AML Act, 8 years</p>
<p>Pursuant to Section 23(1) of the AML Act, obtaining the consent of the relevant customer required to take over the customer due diligence measures carried out by another service provider.</p>	<p>Compliance with the legal obligation according to Article 6(1)(c) of the GDPR, the fulfilment of which is required by Section 7(2)(a)(aa) of the AML Act.</p>	<ul style="list-style-type: none"> • last name and first name, • place and date of birth • Home address 	<p>Under Sections 56(2) and 57(1)-(2) of the AML Act, 8 years</p>
<p>Recording of other information when</p>	<p>Legitimate interest under</p>	<ul style="list-style-type: none"> • customer's occupation; 	<p>Under Sections 56(1)-(2) and</p>

<p>establishing the business relationship. (due diligence questionnaire)</p>	<p>Article 6(1)(f) of the GDPR</p>	<ul style="list-style-type: none"> • for what purposes do they typically effect transactions on their accounts; • do they have ties to Hungary; • what is the expected monthly cash flow on their accounts; • what is the total amount of monthly transfers expected on their accounts; • does the expected annual cash flow on their accounts reach or does it exceed HUF 100,000,000; • what are the most frequent types of transactions on their accounts; • which are the source countries of credit entries received from abroad; • which are the destination countries of transfers abroad; • what is the source of their funds; 	<p>57(1)-(2) of the AML Act, 8 years</p>
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3. CONTACT DETAILS OF THE DATA PROTECTION OFFICER

Data Protection Officer's name: Dr. Zoárd Gázmár
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.

It may happen that certain authorities, public bodies or courts contact our company for the disclosure of personal data. Provided that the body concerned specified the exact purpose and scope of the data, our company shall disclose personal data to these bodies only if and to the extent that is strictly necessary for implementing the purpose of the inquiry and where fulfilling the request is prescribed by law.

Our Company does not use a data processor to process personal data as described above.

5. SOURCE OF THE PERSONAL DATA PROCESSED AND THE SCOPE OF THE DATA WHICH WAS NOT PROVIDED BY THE DATA SUBJECT TO THE DATA CONTROLLER

If the Data Controller does not collect personal data - regarding the Data Subject - from the Data Subjects, accordance with Article 14 of the GDPR it provides information directly to the Data Subject, this information is particular about the source of the personal data and, - where applicable -, whether the data comes from a public register or not.

Based on the Article 6 (1) c) of the GDPR the Bank has an obligatory task in order to execute proper CDD measures – with regards to the AML/CFT Act. – concerning the customer (person commissioned or authorized by the customer to act in the Bank and all authorized representatives etc.) and the beneficial owner, to identify/verify the relevant personal data from a public register.

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 protect data security with particular care, and take all technical and organisational measures and adopt the rules of procedures that are required for enforcing the safeguards specified in the General Data Protection Regulation. We apply suitable measures to protect the data from unauthorised access, alteration, transmission, 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 of 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 protects 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 prevent personal data breaches and in the event of a data breach it takes action immediately to minimise the risks and eliminate the damages.

7. RIGHTS OF DATA SUBJECTS IN CONNECTION WITH THE PROCESSING

Pursuant to Articles 12–21 of the General Data Protection Regulation, data subjects may request from the controller access to and rectification or erasure of their personal data as well as the restriction of 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 Section 1.

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 means, the response shall also be provided by electronic means where possible, unless requested otherwise by the data subject, with the requested format 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 did it provide access to or to whom did it transmit personal data, and from which source were the personal data obtained;
- whether it applies automated decision-making and if yes, 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 are 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 clarify 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 personal data);
- they believe that the processing is unlawful, but the specific data subject opposes to 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 processed as described above 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;
- the personal data were unlawfully processed;

7.6. OBJECTION TO PROCESSING

You have the right to object to the processing based on legitimate interest using any of the contact details provided in Section 1.

8. 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.

A lawsuit 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.