

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 (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 (International Public Administration Cooperation Act), Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises (Credit Institutions Act) and Act XIX of 2014 (FATCA Act).

1. The following table summarises the main features of data processing under this Privacy Notice:

PURPOSE OF PROCESSING	LEGAL BASIS FOR PROCESSING	SCOPE OF DATA SUBJECTS	SCOPE OF 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	Account holder natural person clients of the Controller who are subject to a declaration obligation, or the beneficial owner, authorised representative of legal entity clients	<p>For retail clients:</p> <ul style="list-style-type: none"> - name - name at birth - mother's first, middle and last name - place and date of birth - address - presence/absence of US tax jurisdiction under FATCA - In case of US tax residency, the US tax identification number: - Country(ies) of tax residence under the International Public Administration Cooperation Act - tax identification number(s) of the country concerned - date of declaration - In case of certain declarations, the identification data of witnesses: name, address, signature. <p>In the case of a legal entity or the representative(s) of an organisation without legal personality:</p> <ul style="list-style-type: none"> - data of the organisation represented - data of beneficial owner (name, country of tax residence, date and place of birth, tax number) - date of declaration, official signature. 	For the period necessary to fulfil the obligations under the International Public Administration Cooperation Act, but for 10 years at the most (Section 3/D(5) of the International Public Administration Cooperation Act).
Informing the client in writing of the conduct of a tax residency status check and of the data provision and reporting	Compliance with the legal obligation pursuant to Article 6(1)(c) of the General Data Protection Regulation	Account holder natural person clients of the Controller who qualify as tax residents of a Participating Jurisdiction, or the beneficial owner or authorized	<p>For natural person clients:</p> <ul style="list-style-type: none"> - Client's name, address or postal address - Client's tax residence and tax identification code - Client's place and date of birth - Registered address - Client's account data, balance. 	For the period necessary to fulfil the obligations under the International Public Administration Cooperation

obligations of the Controller.		representative of the clients of a legal entity	In the case of a legal entity or the representative(s) of an organisation without legal personality: <ul style="list-style-type: none"> - Client's name, registered office or postal address - Client's tax residence and tax number - Client's account data, balance. - Type and name of the person conducting the check, and the data provided in case of a natural person. 	Act, but for 10 years at the most (Section 3/D(5) of the International Public Administration Cooperation Act).
Data reporting to the National Tax and Customs Administration (NTCA).	Compliance with the legal obligation pursuant to Article 6(1)(c) of the General Data Protection Regulation	Account holder natural person clients of the Controller who qualify as tax residents of a Participating Jurisdiction, or the beneficial owner or authorized representative of the clients of a legal entity	For natural person clients: <ul style="list-style-type: none"> - Client's account data, balance. - Client's name, date and place of birth, address or postal address. In the case of a legal entity or the representative(s) of an organisation without legal personality: <ul style="list-style-type: none"> - Client's name, registered office or postal address - Client's tax residence and tax number - Client's account data, balance. - Type and name of the person conducting the check, and the data provided in case of a natural person. 	For the period necessary to fulfil the obligations under the International Public Administration Cooperation Act, but for 10 years at the most (Section 3/D(5) of the International Public Administration Cooperation Act).

Please note that only the personal data listed in the table may be processed for the purposes set out above. However, it may be the case 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 US 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 link: https://www.otpbank.hu/portal/hu/Kondiciok/CRS_DAC2_FATCA

2. Details of the Controller and the Controller's Data Protection Officer

Controller's name: OTP Bank Plc. (registered office: H-1051 Budapest, Nádor utca 16; company registration number: 01-10-041585; postal address: OTP Bank Nyrt., H-1876 Budapest; email address: informacio@otpbank.hu; phone number: (+36 1/20/30/70) 3 666 666; website: www.otpbank.hu)
Data Protection Officer's name: Zoárd Gázmár (postal address: H-1131 Budapest, Babér u. 9; email address: adatvedelem@otpbank.hu)

3. Recipients of personal data

The personal data specified in Section 1 of this notice are reported to the NTCA on an annual basis, with the data content specified in the International Public Administration Cooperation 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 is available on the Controller's website in the DAC2/CRS and FATCA notices: https://www.otpbank.hu/portal/hu/Kondiciok/CRS_DAC2_FATCA

4. Source of personal data

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

There may be cases where the Data Subject making the declaration (authorised representative) provides personal data relating to another Data Subject (e.g. beneficial owner) as part of a declaration. In these cases, the source of some personal data is not directly the Data Subject.

5. Data Processors

The Controller does not use a Processor for the processing of the data covered by this Privacy Notice.

6. Rights and remedies available to data subjects in connection with 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; moreover, they have the right to object to 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 using the contact details specified in Section 1.

You, as a data subject, have the following rights:

6.1 Right of access

You are entitled to be informed of the fact of our processing of your personal data and you also have the right to receive the following information:

- purpose or purposes of data processing;
- categories of your personal data processed;
- recipients to whom we transfer your personal data, with special regard to cases where your personal data are transferred to a third country or to international organisations;
- envisaged duration of the processing of your personal data;
- administrative or judicial authorities with which you may lodge a complaint;
- source of personal data if they are not provided directly by you;
- whether your personal data are subject to automated processing; i.e. in a procedure where the personal data are used to evaluate, analyse or predict certain personal characteristics related to you. Such personal characteristics may concern your performance at work, your economic situation, health condition, personal preferences, interests, reliability, behaviour, location or movements.

On one occasion, you may request a complimentary copy of the personal data undergoing processing, and if you make the request by electronic means, you have the right to receive the information in a commonly used electronic form, unless you request otherwise and the Controller is able to provide the data in the requested format. Please be advised that we may reject your request for a copy if this may adversely affect the rights and freedoms of other data subjects.

6.2 Right to rectification

You have the right to obtain from the Controller without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of processing, you are also entitled to have incomplete personal data completed.

6.3 Right to erasure

You have the right to obtain from the Controller the erasure of personal data concerning you without undue delay.

The Controller shall have the obligation to erase your personal data without undue delay where 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 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;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation under EU or Member State law which the Controller is subject to;
- the personal data have been collected in relation to children under 16 years of age and in relation to offering services related to information society.

The request for erasure will be rejected if the processing is necessary. Processing is deemed necessary for the following objectives:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires the processing of personal data under EU or Member State law which the Controller is subject to or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller;
- for health or occupational health purposes or for reasons of public interest in the area of public health;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the erasure of personal data is likely to make impossible or seriously impair the achievement of the objectives of that processing; or
- for the establishment, exercise or defence of legal claims.

6.4 Restriction of processing (blocking)

You have the right to obtain from the Controller the restriction of processing where one of the following applies:

you contest the accuracy of your personal data, in which case the restriction applies to a period that allows the Controller to verify the accuracy of such personal data;

- the processing is unlawful but you oppose the erasure of your personal data and request the restriction of their use instead;
- the Controller no longer needs the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims; or
- the legal basis for processing is a legitimate interest, a public interest or the exercise of official authority, and you object to the processing,
- in which case the restriction remains in force until it is determined whether the legitimate grounds of the Controller override your legitimate grounds.

6.5 Judicial remedy

Moreover, data subjects may lodge a complaint with the National Authority for Data Protection and Freedom of Information (<http://naih.hu/>; H-1055 Budapest, Falk Miksa u. 9–11; postal address: H-1363 Budapest, Pf.: 9; phone: +36 1 391 1400; fax: +36 1 391 1410; email: 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. Data subjects may bring the case before the Budapest-Capital Regional Court or the court of law having jurisdiction over their 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 subjects 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 their habitual residence.