Privacy Policy
concerning data processing related to exchange teller machines

Effective as of: 30 September 2026

1. General provisions

Dear Data Subject, please be informed that you can find detailed information on the processing of your personal data by Raiffeisen Bank Zrt. (the "Bank") as a controller in our General Privacy Policy, available in the Bank's website; however, we think it is also important that we describe in detail some distinguishing characteristics of this particular data processing.

1.1. Controller: Raiffeisen Bank Zrt. (registered office: 1133 Budapest, Váci út 116-118.; company registration number: 01-10-041042; tax number: 10198014-4-44)

1.2. Contact details of the Bank's data protection officer

In writing, in the form of a letter sent to the address Raiffeisen Bank Zrt. Budapest 1700	 **In-person at any branch of Raiffeisen Bank**
Electronically by an e-mail sent to the address info@raiffeisen.hu	**On the phone, at phone number 06-80-488-588**

2. General information about this processing

Pursuant to Section 3 (2) a) of Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises (the "Banking Act"), the Bank may, as a supplementary financial service, perform currency exchange activities in HUF, foreign currency and foreign exchange on a commercial scale.

In order to carry out its currency exchange activity, pursuant to Section 75 (1) of the Banking Act the Bank appoints currency exchange agents as special services intermediaries, who act as the Bank's data processors with regard to the processing related to currency exchange activities.

The purpose of this data processing notice is to provide information regarding the processing of personal data related to currency exchange activities conducted through currency exchange machines operated via the Bank's designated intermediary channels.

The document entitled "Data Processing Policy for Currency Exchange Activities", which is available on the Bank's website under the "Data Processing" heading, as well as at each special services intermediary's currency exchange office, and on the special services intermediaries' websites in electronic form, provides detailed information on additional data processing activities carried out by the Bank's special services intermediaries in connection with currency exchange activities.

3. Purpose of the processing

- Compliance with the customer due diligence measures (identification) specified in Section 14 (1) of Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (the "Money Laundering Act").
- Ensuring compliance with the statutory provisions concerning suspected counterfeit notes in accordance with MNB Decree 1/2023 (I.17.) on the processing and distribution of banknotes, and on technical tasks relating to their protection against counterfeiting (the "Banknotes Decree"), also providing information on the results of the banknote inspection.
- Compliance with the legal requirements regarding complaint handling.

4. Legal basis of the processing

- The legal basis for data processing in connection with the fulfilment of customer due diligence measures is compliance with the legal obligation set forth in Section 14 (1) of the Money Laundering Act, pursuant to Article 6(1)(c) of the GDPR.
- With regard to personal data processed in connection with the minutes on suspected counterfeit currency, the legal basis for data processing is compliance with the legal obligation set forth in Section 22 (5) of the Banknotes Decree, pursuant to Article 6(1)(c) of the GDPR. With regard to providing information on the results of banknote verification, the legal basis for data processing, pursuant to Article 6(1)(a) of the GDPR, is the data subject's consent.
- With regard to data processing carried out in connection with complaint handling, the legal basis for such processing is the Bank's legitimate interest in handling and fully investigating complaints, pursuant to Article 6(1)(f) of the GDPR; the lawfulness of this interest is also supported by Annex 1 of MNB Decree 66/2021 (XII. 20.) on the detailed rules governing the forms and methods of complaint handling by certain financial institutions.

5. Data subjects

The natural person customer or, in the case of a legal person or unincorporated entity customer, the natural person representative or proxy of the customer using—through an XTM—the service related to the currency exchange activity, and, in the case of a complaint, any other natural person. The Bank collects the personal data directly from the data subject.

6. Categories of processed data

- As part of the customer due diligence process, the personal data specified in Section 14 (1) of the Money Laundering Act (family name, first name; place and date of birth) are processed by the XTM scanning the relevant data appearing on the document (the XTM records only the data specified in Section 14 (1) of the Money Laundering Act; the remaining content of the documents or copies thereof are not processed).
- In connection with suspected counterfeit currency, the personal data specified in Annex 4 of the Banknotes Decree, as well as the contact information of the data subject, are processed.
- In connection with complaint handling, the personal data that is essential for investigating complaints and providing information on the results of such investigations (e.g. identification and contact information) is processed in accordance with the provisions set forth in Section III of Annex 1 to MNB Decree 66/2021 (XII. 20.) on the detailed rules governing the forms and methods of complaint handling by certain financial institutions.

7. Retention of data

- With regard to data processed in connection with customer due diligence measures, pursuant to Sections 55-57 of the Money Laundering Act, personal data is retained for 8 years (in exceptional cases, pursuant to Section 58 of the Money Laundering Act, for 10 years) from the date of execution of the transaction order.
- Data contained in the minutes on suspected counterfeit currency are retained for 8 weeks from the date of the transaction, pursuant to Section 22 (4) of the Banknotes Decree (contact information is retained until the consent is withdrawn or, in the absence of such withdrawal, for 8 weeks from the date of the transaction).
- The complaint and the response to it (as well as the personal data contained therein) is retained for 5 years, pursuant to Section 288 (3) of the Banking Act.

8. Recipients

8.1 Processors

Please be informed that in the scope of the processing of personal data the following processor and sub-processors are engaged by the Bank:

- **Interchange Pénzügyi Szolgáltató Kft.** (registered office:1011 Budapest, Corvin tér 10.; .; company registration number: 01-09-169375; tax number: 10740862-4-41):
- **Magyar Pénzváltó Kereskedelmi Korlátolt Felelősségű Társaság (**registered office: 1011 Budapest, Corvin tér 10.; company registration number: 01-09-361615; tax number: 10937266-4-41)

They process personal data in connection with the currency exchange services provided by the company through XTMs as a special services intermediary.

- **Square21 Software and Technology Kft.** (registered office: 3300 Eger, Temesvári utca 5.): The company operates XTMs as a sub-processor.
- **Microsoft Corp.** (WA 98052, One Microsoft Way Redmond, USA): The company provides hosting services as a sub-processor.

9. Rights of the Data Subjects

Please note that you have the following data subject rights under the GDPR.

Data subject right	Rights you are entitled to
Withdrawal of consent	You can amend or withdraw your consent at any time free of charge, without restrictions and without giving any reason. The withdrawal of your consent will not affect the lawfulness of any earlier data processing performed under such consent before the withdrawal.
Right of access	You may request information on whether the Bank processes your personal data and, if so, you may request that the Bank inform you regarding - for what purpose, - what kind of personal data, - on what legal basis and - to whom are transmitted, and - for how long the data are processed. If you have not provided your personal data to the Bank, you may request

Data subject right	Rights you are entitled to
	information about the source of the data.
Right to rectification	You have the right to request the rectification of inaccurate personal data relating to you and, upon your request, the Bank must rectify such inaccurate personal data without undue delay. The Bank may ask you to provide credible evidence of the accuracy of the personal data. You may also request the completion of incomplete personal data, taking into account the purpose of the processing.
Right to erasure ("right to be forgotten")	You have the right to request the deletion of your personal data, which the Bank must comply with without undue delay. The Bank is not obliged to delete your personal data even at your request if the processing of your personal data - is mandatory under EU or Member State law (e.g. data processed under the Act on the Prevention of Money Laundering or the Act on Accounting); - is necessary for exercising the right of freedom of expression and information; - is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as erasure is likely to render impossible or seriously impair that processing; - is necessary for the establishment, exercise or defence of legal claims (e.g. the data are needed to be used as evidence in a judicial process). In addition, the Bank is also obliged to delete personal data concerning you without undue delay if the conditions detailed in Article 17 of the GDPR prevail.
Right to restriction of processing	You have the right to ask the Bank to restrict the processing of your personal data, which means that you are required to clearly identify your personal data so that no further processing of your personal data can take place. Please note that you can request the restriction of your data if one of the following conditions is met: - you dispute the accuracy of the personal data, in which case the restriction shall last until the Bank is able to verify their accuracy; - the processing is unlawful and you oppose the erasure of the data and request the restriction of their use instead; - the Bank no longer needs the personal data for the purposes of the processing, but you need them for the establishment, exercise or defence of legal claims; - you object to the processing, in which case the restriction will apply until it is established whether or not the Bank's legitimate grounds prevail over your legitimate grounds.

Data subject right	Rights you are entitled to
Right to data portability	You have the right to - request the personal data concerning you, which you have provided to the Bank, in a structured, commonly used and machine-readable format; - transfer these personal data to another controller without the Bank having the right to obstruct this, provided that the processing is based on your consent or on a contract, and the processing is automated; - have the personal data transmitted directly from one controller (such as the Bank) to another, where technically feasible.
Right to object	You have the right to object at any time, on grounds relating to your particular situation, if you consider that the Bank is processing your personal data inappropriately for the purposes set out in this Privacy Policy. In such case, the Bank must demonstrate that the processing of the personal data is justified by compelling legitimate grounds which override the interests, rights and freedoms of the data subject or are related to the establishment, exercise or defence of legal claims.

Please be further informed that you can find more details concerning the rights you are entitled to in the Bank's General Privacy Policy, in the chapter "Rights of the Data Subjects".

10. Legal remedies

In case you suppose that your rights to privacy have been violated, you may refer to the Bank's Data Protection Officer and inform him/her of the problem related to the Bank's data processing, as well as request information from him/her or ask for his/her opinion.

If you disagree with the opinion of the Bank's Data Protection Officer, but also regardless of that, upon any violation of your rights related to the protection of your personal data, you may refer your complaint to the Hungarian National Authority for Data Protection and Freedom of Information (registered office: 1055 Budapest, Falk Miksa utca 9-11., mailing address: 1363 Budapest, Pf. 9, telephone: +36-1-391-1400, fax: +36-1-391-1410, e-mail: ugyfelszolgalat@naih.hu) for remedy.

In case you suppose that your rights to privacy have been violated, you also have the right to refer to a court. You can bring the action before the court having jurisdiction and venue, that is, the court of the defendant's domicile or, at your choice, the court of the place where you live or reside. You may look up the court having jurisdiction in legal disputes related to data processing at the following link: http://birosag.hu/ugyfelkapcsolati-portal/illetekessegkereso.

11. Further information

The Bank shall have the right at any time to change the content of this Privacy Policy in its sole discretion, without giving any special notice. Such changes are not governed by the provisions of Chapter XIX of the General Business Conditions.

For more detailed information, please refer to the privacy policies available in the website www.raiffeisen.hu under the heading Data Processing, the Bank's General Business Conditions, and the relevant statutory provisions, including in particular the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation or GDPR), and you may as well ask for information through any communication channel of the Bank as detailed above.

For issues that are not regulated—or not regulated in sufficient detail—here, the provisions relevant to this legal relationship of the General Privacy Policy, available in the Bank's website, shall be governing.