Data Protection Policy

OTP Bank Plc., as the leading financial institution in Hungary, is committed to developing, operating and applying such a regulatory, executive and control system which ensures the safekeeping and protection of bank secrets, securities secrets as well as personal data in accordance with the criteria specified in relevant legal acts and its fundamental business interests.

The personal data processed by OTP Bank Plc. include in particular data required for identifying and liaising with customers, data required for the provision of a given service and/or data generated and processed in the course of the provision of the given service (including data related to debt collection), conclusions drawn, data derived from data processed by means of analysis, the data of the communication – performed on any communication channel – between OTP Bank Plc. and the data subject, certain data of the individual devices used for accessing the services provided by OTP Bank Plc. by the data subject and – if relevant – publicly accessible data.

OTP Bank Plc. treats all data, facts, information, solutions relating to its customers' persons, data, financial situation, business activity, management, ownership and business relations, the balance and turnover on customers' accounts it holds.

The legal framework for the protection of personal data is determined by the EU's **General Data Protection Regulation**, the Act on the Right of Informational Self-Determination and on Freedom of Information, the Act on Credit Institutions and Financial Enterprises, the Act on Investment Firms and Commodity Dealers, and on the Regulations Governing their Activities, the Act on the Capital Market, other national legal acts governing OTP Bank's activity and the EU's compulsory legal acts.

When processing personal data and transferring it to third parties, OTP Bank respects fundamental rights and fully ensures the principles of data protection all the time. Accordingly, it ensures

- that personal data shall be processed lawfully, fairly and in a transparent manner for data subjects. According to this principle OTP Bank takes care of obtaining data subjects' consent, when consent is the legal basis of data processing.
- that personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- that personal data processed shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- that personal data processed shall be accurate and, where necessary, kept up to date and OTP Bank takes every reasonable step to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified;

- that personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- that personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures;
- OTP Bank as data controller requires 3rd parties (joint controllers, data processors, independent controllers) with whom the data is shared to comply with the principles and requirements laid down in the OTP Bank's privacy policy.

The detailed rules of data processing are contained in OTP Bank Plc.'s General Business Rules, in the business rules relating to certain business services (including ancillary business services) and investment services (including ancillary investment services) of business divisions as well as the related information brochures on data processing in force at any time, which are available on the following links:

- **General Business Rules** and the related **General Information Brochure on Data Processing**
- **business rules of the business divisions and the related information brochures on data processing**.

These documents contain details on the following:

- data subjects concerned by the given services of OTP Bank Plc. (customers, potential customers and other data subjects concerned);
- data kept in records of data subjects in relation to the given service,
- purpose(s) of data processing;
- legal ground(s) for data processing;
- retention period of data processed;
- cases where personal data is processed using the automated decision-making method and used for profiling by OTP Bank Plc.;
- the recipients of the transfer of the personal data processed and the legal ground for data transfer;
- data processors used during the data processing;
- the rights data subjects are granted, thus, in particular, that – according to Articles 12-21 of the **General Data Protection Regulation** – the data subject has the right to request from OTP Bank Plc., as data controller, access to and rectification or erasure of personal

data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability.

OTP Bank and members of the OTP group concerned process data, facts and information which are personal data, bank, securities and fund secrets, which they receive, ensuring high level of protection. Using these data OTP group members concerned can draw the attention of clients to the best and widest possible offers. The relevant data protection information brochure can be **read here**.

The OTP Bank can use the data of its clients available for the purpose of analysis, data will be used for tailoring and offering personalized offers if the client consented to it and uses data on legitimate interest for product developing and analysis aimed at making business decision. The relevant data protection information brochure can be **read here**.

Data subjects may request information with regard to the processing of their personal data and may submit their requests and complaints as well at the following contact details:
OTP Bank Nyrt., 1051 Budapest, Nádor utca 16.
OTP Bank Nyrt., 1876 Budapest
E-mail address: **informacio@otpbank.hu**
Phone number: (+36 1/20/30/70) 3 666 666

Data subjects may submit their written comments in respect of data processing to OTP Bank Plc.'s data protection officer as well:
dr. Csaba Bús
1131 Budapest, Babér u. 9.
adatvedelem@otpbank.hu.

Further, the data subject may as well submit a complaint at the Hungarian National Authority for Data Protection and Freedom of Information (**http://naih.hu/**; 1055 Budapest, Falk Miksa u. 9-11.; Postal address: 1363 Budapest, Pf.: 9.; Phone: +36-1-391-1400; Fax: +36-1-391-1410; Fax: +36-1-391-1410; E-mail: **ugyfelszolgalat@naih.hu**).

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OTP Bank Plc. treats all data transferred to it over the Internet using the same level of protection as if they were transferred to it using any other channel.