

INFORMATION ON DATA PROCESSING

Relating to OTP Bank Plc.'s Annual General and Extraordinary General Meetings

The data processing is carried out in accordance with the REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 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: GDPR) and the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

OTP Bank Plc. (registered seat: 1051 Budapest, Nádor utca 16., hereinafter: Bank or Company) ensures in all cases the legality and purposefulness of data processing with regard to the personal data it manages. The purpose of this information sheet is to provide shareholders with comprehensive information on the processing of their personal data in relation to OTP Bank Plc.'s annual general and extraordinary general meetings. The Bank publishes the latest data processing notice in force prior to the general meeting on its website and displays it at the venue of the general meeting.

1. Name and contact of the data controller

Name of data controller: OTP Bank Plc.
Registered seat: H-1051 Budapest, Nádor utca 16.
Postal address: OTP Bank Plc., H-1876 Budapest
E-mail: informacio@otpbank.hu
Telephone: +36 1/20/30/70 366 6666
Website: www.otpbank.hu

2. The features of the data processing based on this Prospectus are summarized in the following chart:

Data processing no. 1: Attendance Sheet of the General Meeting

AIM OF THE DATA PROCESSING	LEGAL BASIS OF THE DATA PROCESSING AND DATA FORWARDING	SCOPE OF PROCESSED DATA	DURATION OF DATA PROCESSING
Documenting attendance at the General Meeting/ fulfilling a legal obligation.	<p>Pursuant to Article 6 (1) c) of GDPR, processing is necessary for compliance with a legal obligation [Act V of 2013, Section 3:274. (1), (2)] to which the controller is subject.</p> <p>Data processor forwards the data to the Company Registry Court of the Budapest Metropolitan Court as follows: Act V of 2013, Section 3:278. (4)</p>	<p>In case of shareholders (natural person or legal person, in case of individual entrepreneur): name, address/in case of individual entrepreneur registered office, identifier, ID card number (only in case of natural persons), number of shares, number of votes, number of voting terminal, number of voting blocks, signature;</p> <p>In case of a representative (proxy of a natural person shareholder/ representative of a legal person shareholder): name, address, ID card number, signature.</p>	Until the Bank ceases to exist without legal successor.

Data processing no. 2: Production and transfer of shareholder register general meeting export files to ShiwaForce.com Inc as data processor in order to conduct the General Meeting with a wireless voting system

AIM OF THE DATA PROCESSING	LEGAL BASIS OF THE DATA PROCESSING	SCOPE OF PROCESSED DATA	DURATION OF DATA PROCESSING
The data contained in the register of shareholders shall be used and transferred in the General Meeting of the OTP Bank Plc. in order to ensure the exercise of shareholders' rights and obligations.	Pursuant to Article 6 (1) c) of GDPR, processing is necessary for compliance with a legal obligation (Act V of 2013, Section 3:19.) to which the controller is subject.	In the case of shareholders (natural person or legal person if it counts as individual entrepreneur): name, address/in the case of individual entrepreneurs registered office, identifier, ID card number (only for natural persons), number of shares, number of votes, mother's name (only for natural persons), date of birth (only for natural persons); In the case of a representative: (proxy of a natural person shareholder/ representative of a legal person shareholder): name, address, ID card number; In case the share has more than one owners, the details of both the owners and the common representative, according to the above.	Until the Bank ceases to exist without legal successor.

Data processing no. 3: Minutes of the General Meeting

AIM OF THE DATA PROCESSING	LEGAL BASIS OF THE DATA PROCESSING AND DATA FORWARDING	SCOPE OF PROCESSED DATA	DURATION OF DATA PROCESSING
Documenting the General Meeting/fulfilling a legal obligation.	Pursuant to Article 6 (1) c) of GDPR, processing is necessary for compliance with a legal obligation [Act V of 2013, Section 3:278. (1) c), (2)] to which the controller is subject Data controller shall forward the data to the Court of Registry of Budapest Metropolitan Court as follows: Act V of 2013., Section 3:278. (4)	In case of the chairman of the General Meeting/keeper of the minutes, the elected shareholder witnessing the minutes: name and signature In case of vote counters/speakers: name	Until the Bank ceases to exist without legal successor.

Data processing no. 4: Video and audio recording on the General Meeting

AIM OF THE DATA PROCESSING	LEGAL BASIS OF THE DATA PROCESSING	SCOPE OF PROCESSED DATA	DURATION OF DATA PROCESSING
<p>The audio and video recording shall be used for the purpose of documenting the General Meeting as official corporate event as well as for projecting the live image of the General Meeting in the press room.</p> <p>The data contained in the letter of consent shall exclusively be used for the purpose of enabling OTP Bank Plc. to verify the granting of the consent in connection with the above. The declaration of consent is made in two copies, the original remains with the Bank, and the duplicate is handed over to the contributor.</p>	Consent [according to Article 6 (1) a) of GDPR]	<p>Name, address provided in the consent letter, signature;</p> <p>Video and audio recording.</p>	For 5 years following the holding of General Meeting.
After the General Meeting a video and audio recording will be recorded as part of the press event.	Legitimate interest [according to Article 6 (1) f) of GDPR]	Video and audio recording.	For 5 years following the holding of General Meeting.

Data processing no. 5: Proxies for the General Meeting

AIM OF THE DATA PROCESSING	LEGAL BASIS OF THE DATA PROCESSING	SCOPE OF PROCESSED DATA	DURATION OF DATA PROCESSING
Compliance with legal provisions, management of powers of attorney during the decision-making process.	Pursuant to Article 6 (1) c) of GDPR, processing is necessary for compliance with a legal obligation [Act V of 2013, Section 3:110. (1), (2), Section 3:256., Section 6:15. (1), (2), (3), (4), (5)] to which the controller is subject.	In the case of natural persons included in the Power of attorney: (principal, proxy, witness): name, address, number of identity document, mother's name, tax identification number, signature.	Until the Bank ceases to exist without legal successor.

3. Data of the data protection officer

Name of data protection officer: Zoárd Gázmár
Postal address: H-1131 Budapest, Babér utca 9.
E-mail: adatvedelem@otpbank.hu

4. Data processors

The following data processors will be used for producing facial likeness and recorded voice by the OTP Bank Plc.:

Name	Registered seat	Registry number (company registration number)
BRILL Audio Visual Kft. (represented by: Mr. Zoltán Mihály Éder, independently)	H-1097 Budapest, Gubacsi út 28/A	01-09-683103
Dániel Németh e.v.	H-2045 Törökbálint, Apponyi utca 30.	13179105

The following data processors will be used for processing personal data contained in the registry of shareholders by the OTP Bank Plc.:

Name	Registered seat	Registry number (company registration number)
ShiwaForce.com Inc	H-1123 Budapest, Alkotás utca 17-19.	01-10-046943

5. Personal rights aspectus of the producing facial likeness and recorded voice

According to the Subsection 1 of Section 2:48 of Ptk., facial likeness and recorded voice shall be produced or used only with the consent of the person affected (data subject). The Data Controller informs the data subject that facial likeness and recorded voice may be produced of him/her, with the consent of the contributor signing it. In case of the person affected does not intend to be captured (facial likeness) or recorded (voice) he/she is entitled to inform of this the producer of the facial likeness and recorded voice on the event. Moreover, the data controller hereby notifies the person affected that, according to the Subsection 2 of Section 2:48 of Act V of 2013 on the Civil Code, the consent of the relevant person is not required for recording his/her likeness or voice, and for the use of such recording if made of a crowd (in which case the characters in the picture appear as a crowd).

6. Data security

Our Company's computer systems and other data storage locations are located at the headquarters and on servers rented by the data processor. Our Company selects and operates the IT tools used in the provision of the service to manage personal data in such a way that the processed data:

- accessible to those authorized to do so (availability);
- its authenticity and authentication are ensured (authenticity of data management);
- its immutability can be verified (data integrity);
- be protected against unauthorized access (data confidentiality).

We pay special attention to the security of the data, we also take the technical and organizational measures and develop the procedural rules that are necessary to enforce the guarantees according to the General Data Protection Regulation. We protect the data with appropriate measures, especially against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as against accidental destruction, damage, and inaccessibility resulting from changes in the technology used.

The IT system and network of our Company and our partners are both protected against computer-assisted fraud, computer viruses, computer intrusions and denial-of-service attacks. The operator ensures security with server-level and application-level protection procedures. Daily data backup is done. In order to avoid data protection incidents, our company takes all possible measures, in the event of such an incident – according to our incident management policy – we take immediate action to minimize risks and prevent damages.

7. Rights and remedies related to the data processing of the person affected (data subject)

The person affected – based on the Articles 12–21 of GDPR – has right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject and to object to processing as well as the right to data portability.

In case of the infringement of the rights of personal affected determined in the GDPR the person affected has the right to lodge a complaint to data protection officer (his data contained in the Point 1 of this Prospectus).

As data subject you have the following rights:

7.1 Right of access

The Data Subject has the right to become aware of all personal data that OTP Bank Plc. processes concerning you. The Data Subject has the right to get the following information:

- the purpose of processing;
- the categories of the personal data processed;
- the recipients or categories of recipients to whom OTP Bank Plc. disclosed or may disclose the Data Subject's personal data;
- the envisaged period for which the personal data will be stored;
- the administrative and judicial authorities, where the Data Subject may lodge a complaint;
- in respect of personal data that has not been provided by the Data Subject, information on the source from which the personal data originate;
- where OTP Bank Plc. will also process the Data Subject's personal data for the purposes of automated decision-making, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the Data Subject.

Upon the Data Subject's request, OTP Bank Plc. shall provide a free copy (once) of the personal data processed. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

Please note that OTP Bank Plc. may refuse to make a copy if it would violate the rights and freedoms of others.

7.2 Right to rectification

The Data Subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the Data Subject shall have the right to has incomplete personal data completed, including by means of providing a supplementary statement.

7.3 Right to erasure

The Data Subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay.

The Data Subject shall be entitled to initiate the erasure of personal data concerning him in the following cases:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed by OTP Bank Plc.;
- the Data Subject withdraws the consent granted, and there is no other legal basis for processing by OTP Bank Plc.;
- the Data Subject objects to the processing and there are no overriding legitimate grounds for the processing other than processing for direct marketing purposes based on legitimate interest;
- where personal data are processed for direct marketing purposes, the Data Subject shall has the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing;
- OTP Bank Plc. has processed the Data Subject's personal data unlawfully;
- OTP Bank Plc. is required to erase the personal data in order to comply with an obligation imposed on OTP Bank Plc. by law or by a binding legal act of the European Union; or
- the personal data have been collected in relation to the offer of information society services to children.

7.4 Right to restriction of processing

The Data Subject shall have the right to obtain from OTP Bank Plc. restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by the Data Subject, for a period enabling OTP Bank Plc. to verify the accuracy of the personal data;
- the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead;
- OTP Bank Plc. 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;
- the Data Subject has objected to processing pending the verification whether the legitimate grounds of OTP Bank Plc. override those of the Data Subject.

7.5 Right to data portability

You may at any time request that the Data Controller provide your personal data processed on a consent basis, in a structured, widely used, machine-readable format.

If it is otherwise technically feasible, the Data Controller will transfer the personal data at your request directly to another data controller indicated in your request. The right to data portability under this point does not create an obligation for data controllers to implement or maintain technically compatible data management systems.

In the event that your right to data portability adversely affects the rights and freedoms of others, in particular the trade secrets and intellectual property of others, the Data Controller is entitled to refuse to comply with your request to the extent necessary.

7.6 Right to object

The Data Subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6 (1), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, the Data Subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. The personal data shall no longer be processed for such purposes.

The Data Subject may exercise his or her right to object by automated means using technical specifications.

Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to the Data Subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

8. Enforcement of rights

If the data subject considers that the Company has violated the applicable data protection rules when handling his/her personal data, he/she can file a complaint addressed to the Hungarian National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa utca 9-11.; postal address: 1363 Budapest, Pf. 9; phone: +36 1 391 1400; fax: +36 1 391 1410; e-mail: ugyfelszolgalat@naih.hu). Data subject may turn to other supervisory authority as well corresponding to his/her residential address.

Procedures may be filed regarding the breach of the data processing regulations at the court against the data processor. Data subject may file his/her claim at the Budapest-Capital Regional Court or at the regional court corresponding to his/her residential address. Data subject may access the list of Hungarian regional courts on the following link: <http://birosag.hu/torvenyszekek>.