

Privacy Policy for the Raiffeisen Loyalty Program

Effective as of: 9 May 2025

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. (collectively, the "Bank") (registered office: 1133 Budapest, Váci út 116-118.)

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



The Bank's data protection officer is dr. Gergely Balázs.

2. General information about this processing

The purpose of the processing is to enable the Bank to provide its customers (the "Customer") with various discounts in the course of the operation of the Raiffeisen Loyalty Program (the "Program") established by the Bank. Those Customers of Raiffeisen Bank (the "Customer") are eligible to participate in the Program who meet the conditions set out in the General Terms and Conditions of the Raiffeisen Loyalty Program (the "Loyalty Program GTC").

The Customer may benefit from the discounts linked to the purchase of goods or the use of services and offered by one or more of the Bank's partners (the "Partner"), currently displayed in the website of the Program.

The Customer may claim a discount in the case of in-store purchase by downloading the offer, printing the coupon and handing it over to the Partner, or showing the coupon from a mobile device, or showing his/her credit card, or in the case of online shopping by making the purchase in the online store.

Please be informed that you can find detailed information about the Program in the [Loyalty Program GTC](#).

3. Processing purpose

The purpose of the processing is to enable the Bank to provide its customers with various discounts in the course of the operation of the Raiffeisen Loyalty Program established by the Bank.

In the scope of this, when operating the Program, the Bank

- allows the Program Member to create and access a Program Account;
- provides an opportunity for Point Collection in Point Collection Events;
- stores Points in the Program Member's Program Account.

4. Legal basis of the processing

Based on Article 6 (1) b) of Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR), the preparation, conclusion and performance of the contract connected to the entry into the Loyalty Program. The [Loyalty Program GTC](#) is available on the Program website.

5. Data subjects

The Data Subjects are those natural person Customers of the Bank who have right of access to the Bank's Digital Channels and who have already logged in to the Loyalty Program platform at least once. You can read more about the terms and conditions of Program membership in the [Loyalty Program GTC](#).

6. Categories of processed data

The Customer's family name and given name, gender, place and date of birth, mother's name, e-mail address, telephone number and county of preference.

7. Retention of data

In the case of processing concerning the Customer, the Bank shall retain the data provided to it for 30 days after the Customer leaves the Program.

8. Involvement of data processors

Please be informed that in the scope of the processing of personal data the following processor is engaged by the Bank:

- LEAD GENERATION Kft. (registered office: 1036 Budapest, Lajos utca 66).

9. Rights of data subjects

Please note that you have the following Data Subject rights under the GDPR.

Data Subject right	Rights you are entitled to
Right of access, right to information	<p>You may request information on whether the Bank processes your personal data and, if so, you may request that the Bank inform you regarding</p> <ul style="list-style-type: none"> - 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. <p>If you have not provided your personal data to the Bank, you may request information about the source of the data.</p>

Data Subject right	Rights you are entitled to
Right to rectification	<p>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.</p>
Right to erasure ("right to be forgotten")	<p>You have the right to request the deletion of your personal data, which the Bank must comply with without undue delay.</p> <p>The Bank is not obliged to delete your personal data even at your request if the processing of your personal data</p> <ul style="list-style-type: none"> - is required by an obligation 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). <p>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 are met.</p>
Right to restriction of processing	<p>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.</p> <p>Please note that you can request the restriction of your data if one of the following conditions is met:</p> <ul style="list-style-type: none"> - 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.
Right to data portability	<p>You have the right to</p> <ul style="list-style-type: none"> - 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.

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.