

Effective: 01. August 2023

To ensure secure processing and protection of your personal data is of primary importance to us. To this end we always ensure that we process your data only to such an extent which is required for the execution of any given process or measure, and we will take every technical and organizational measure to prevent unauthorized persons from accessing your data.

This data protection guide will give you all the necessary information on what happens to your data after you provide them to our company.

I. DATA PROCESSOR'S DATA

Your data are processed by Alfa VIG Pension Fund Management Ltd., who is the Data Processor in respect of this guide.

- > Seat: 1091 Budapest, Üllői út 1.
- > Postal address: 1399 Budapest, Pf. 717
- > Telephone: 06-1-477-4890
- > E-mail address: nypugyf@alfa.hu
- > Website: www.alfanyugdij.hu

II. DATA PROCESSING OFFICER

- > Contact information: nyp.adatvedelem@alfa.hu

III. PURPOSE OF AND LEGAL GROUNDS FOR PROCESSING DATA

Data may be collected for a clearly determined, specific purpose (i.e. it is restricted to a purpose), and may only be processed in a manner which is compatible with such purpose.

In order to ensure lawful data processing, the law clearly determines the legal grounds, the existence of which makes data processing possible:

- > the stakeholder's consent,
- > legal regulations to process a certain data class,
- > data processing is required to fulfil a specific contract,
- > it is the company's legitimate interest.

PROCESSING THE DATA OF MEMBER ORGANIZERS AND CONTRACTED PARTNERS

Member organizers

The company shall process the identification and contact information of natural person or individual entrepreneur Member organizers, (hereinafter referred to as member organizer), as well as information necessary to fulfil the contract and information produced relevant to this.

The data of member organizers will be processed for the following purposes:

- > to fulfil rights and obligations arising from the permanent agency agreement;
- > to comply with accounting regulations;
- > to enforce live claims as well as civil and criminal claims against the member organizer;
- > to clear up intermediary activity, manage and detect prevent fraud.

Legal grounds for data processing:

- > data processing required for fulfilling the agreement for intermediaries
- > data processing stipulated by legal provisions (Accounting Act)
- > data processing is required to enforce the legitimate interests of the data controller:
 - interest in proof during the enforcement of civil and criminal law claims
 - prevent of fraud related to intermediary activity, investigate and manage of suspected fraud cases

Recipients of personal data:

- > service providers engaged in activities related to keeping the records of contracts, paying commissions, and the clawback of unjustified commission paid.
- > authorities entitled to access data in compliance with legal provisions, e.g. the Hungarian National Bank, the National Tax and Customs Administration of Hungary, authorities investigating a case, the public prosecutor's office, and the court.

Data will be processed while the contract is in force and after its termination as long as claim may be enforced with regard to the contractual relationship. Accounting documents must be kept for 8 years in compliance with the law.

Contracted partners

In terms of service partners who are in a contractual relationship with the Pension Fund, the identification data and signature of representatives acting in the course of concluding the agreement as well as the identification data and supplied contact information of designated contact persons and persons taking part in the fulfilment of the contract will be processed by us.

Legal ground for data processing in case of representative persons is to fulfill the legal obligation contained in the Civil Code. Legal grounds for data processing in case of contact persons and persons taking part in the fulfilment of the contract is the legitimate interest of the data controller relevant to the fulfilment of the agreement (carrying out the contractual tasks, keeping in touch with the persons designated to do so, cooperation).

During the contractual legal relationship the purpose of data management is to fulfill the Accounting Regulations, and its legal basis is to fulfill a legal obligation. Data will be processed while the contract is in force and after its termination as long as claim may be enforced with regard to the contractual relationship. Accounting documents must be kept for 8 years in compliance with the law.

SOUND RECORDING¹

Your conversation with our call centre will be recorded to for quality assurance purposes, which includes the following: verify the measures taken, to retrace the content of the statement made, to identify the individual making the statement and the date of such statement, and to protect the rights of the persons taking part in the conversation, as well as checking the work of call center staff. Processing data is based on the legitimate interest of the data controller in the traceability of calls, the subsequent verification of statements made, and the improvement of the level of customer service. If you want to avoid recording, we will not provide the opportunity to arrange matters over the phone, however, you will have the opportunity to contact the company in mail or e-mail.

Calls conducted with our sales call centre operators will also be recorded. You may discontinue the call any time, if you feel it is unsuitable for you.

Sound recordings will be kept because of the legitimate interest of the company for five years. It is in the interest of the company to prove the content of the calls upon the client's request or in the course of possible public proceedings.

Our state-of-the-art rescue system ensures that the calls are not modified and are protected at an appropriate level.

DATA PROCESSING ON THE WEBSITE

The servers to operate the company's website are provided and operated by Alfa Vienna Insurance Group Biztosító Zrt.

Calculators

If you use our pension calculator, we will ask that you give your name, sex, date of birth, telephone number, e-mail address so that we can send you the calculation in an e-mail, or in order for our Call Centre to contact you, if necessary, and help you to conclude the pension fund contract.

You may decide to give the data required for the conclusion of the pension fund contract online (opting online contracting). In this case all the data necessary to conclude the contract must be submitted.

Your data will be transferred to the company's Call Centre in this case, too, and they will contact you over the phone to conclude the contract.

Data processing is based on consent. If you do not consent to it, or you revoke your consent, you may choose others means of joining the pension fund. Data will be processed for one year, and if membership is established earlier, data processing will last until such date.

You may withdraw your consent any time, without restrictions, free of charge.

Cookies

For more detail about the cookie management, [please click here](#).

PROCESSING DATA FOR DIRECT MARKETING PURPOSES

- > In order to increase the number of pension fund contracts the company will collect the data of interested private individuals from external sources, contact these individuals over the phone or in electronic mail to conclude a contract. Data will be processed based on the individual's consent.
- > Data required are as follows: name, telephone number, e-mail address, address, date of birth
- > Data may come from online registration, telephone contact, personal contact, database taken over from another data processor, public database.
- > Consent to data processing is valid for five years, and must be renewed every five years, otherwise it will lapse.
- > The consent may be revoked any time within the validity period, in this case you will not get more advertisements from us.

IV. DATA TRANSFER AND DELIVERY TO EXTERNAL PARTIES

Personal data may be accessed primarily by the company's employees and officers who need such data for fulfilling their job, and in some instances data may be transferred to external parties.

The company is entitled to use a data processing company to perform technical activities pertaining to data processing operations.

Recipients of personal data might be as follows

For member recruiting subcontractors:

- > Alfa Pension Fund
- > service providers engaged in activities related to keeping the records of contracts, paying commissions, and the clawback of unjustified commission paid.
- > authorities entitled to access data in compliance with legal provisions, e.g. the Hungarian National Bank, the National Tax and Customs Administration of Hungary, authorities investigating a case, the public prosecutor's office, and the court.

For contracted partners:

- > service providers engaged in activities related to keeping the records of contracts, paying commissions, and the clawback of unjustified commission paid.
- > authorities entitled to access data in compliance with legal provisions, e.g. the Hungarian National Bank, the National Tax and Customs Administration of Hungary, authorities investigating a case, the public prosecutor's office, and the court.

In the event of registration on the website, data processing with the purpose of direct marketing:

- > external service providers who perform activities related to the company's activities, where the performance of such activities requires data management or data processing (e.g.: businesses operating IT systems and carrying out certain IT tasks).

V. DATA TRANSFER TO A THIRD COUNTRY OR TO AN INTERNATIONAL ORGANIZATION

Your data will not be transferred.

VI. DATA RETENTION PERIOD

- > For member recruiting subcontractors and contracted partners:
Data will be processed while the contract is in force and after its termination as long as claim may be enforced with regard to the contractual relationship. Accounting documents must be kept for eight years in compliance with the law.
- > In the event of registration on the website, data processing will last for one year after registration.
- > In the event of data processing for direct marketing purposes: data will be processed for five years after the consent is given.

¹ Act V of 2013 on the Civil Code 2:48 §

VII. RIGHTS OF THE INDIVIDUAL

1. Access right: It means that you may ask for feedback whether or not data processing is in progress and ask for more details, specifically about the following:

- > what is the purpose of data processing
- > categories of related personal data
- > where did we transfer data to (if outside the EU, what are the guarantees)
- > the term of keeping data
- > if we did not ask data directly from the Client, what are the sources of such data
- > what are the rights of the relevant client
- > the fact of automated decision making or profiling, the logic used, and the consequences.

Upon request we will make a copy of your personal data available to you.

2. Correction: If you discover that the personal data on our files are not appropriate (incorrect, incomplete), you may request that they be corrected or completed.

3. Deletion (cancellation): Upon your request we will delete your personal data if:

- > they are not needed any longer for the purpose which they were recorded for,
- > you withdraw your consent and there is no other legal ground verifying data processing,
- > the company processes data out of its own legitimate interests, you object to such data processing, and there is no legal reason having priority over it,
- > data are processed against the law,
- > the law specifies that they be deleted,
- > in the event of using electronic services offered to children.

If we need to delete data pursuant to the above, we will do our best – considering the technology available to us as well as the costs related to execution – in order to make the fact of deletion known to those who received your data, and inform them on the need to delete the links pointing at any personal data and copies thereof.

Deletion have further specific restrictions if data are required to enforce claims or for the purposes of public interest (national health, archiving due to scientific and historical research).

4. Restrictions to data processing: may occur in the following instances

- > if you challenge the accuracy of data, and we need time to check it,
- > if data processing is against the law, but you specifically ask for restriction instead of deletion,
- > data are no longer needed for the purpose of data processing, but you ask them to be kept in order to submit, enforce or protect legal claims,
- > if data is processing pursuant to the company's legitimate interest, and you object to data processing, data processing will be restricted until we establish if the company's legitimate interest enjoys priority over your objections.

Restriction means that your data will only be stored, unless you ask for some other measures to be taken as well, or if data are needed to submit, enforce or protect legal claims, or if it is necessitated by the protection of another person's rights or by important public interest.

5. Right of objection

For any reasons related to your own situation, you can object at any time to the processing of your personal data based on the legitimate interests of the Data Controller, including profiling.

In this case, the data controller may no longer process the personal data, unless the data controller proves that the data processing is justified by compelling legitimate reasons that take precedence over the interests, rights and freedoms of the data subject, or that are necessary for the enforcement or legal claims. An example is data processing for acquisition purposes. If the client objects to it, we will acknowledge it, and will not contact him/her with our product offers.

6. Portability of data

You may request that we hand over to you electronically the data you made available to us, or we transfer such data to a data manager/data processor specified by you, provided that the necessary technical and data security conditions are given. Your request may refer to data that we process pursuant to your consent, or for the purposes of the fulfilment of the contract, in an automated manner.

7. Right of filing a complaint to the authority

You may contact the National Authority for Data Protection and Freedom of Information against our data processing.

Authority's address: 1055 Budapest, Falk Miksa utca 9–11.

Authority's mailing address: 1363 Budapest, Pf. 9

Authority's website: www.naih.hu

VIII. AUTOMATED DECISION-MAKING, PROFILING

When making decisions pertaining to data processing purposes as specified above we do not apply automated decision-making.

IX. DATA PROCESSING FOR OTHER PURPOSES

We will not use your data you made available to us for purposes other than the ones specified herein.