

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 Alfa Pension Fund.

I. DATA PROCESSOR'S DATA

Your data are processed by Alfa Pension Fund (Alfa Önkéntes Nyugdíjpénztár), 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: nypugyfel@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 Fund's legitimate interest.

DATA PROCESSING IN RELATION TO VOLUNTARY PENSION FUND MEMBERSHIP

1. Purpose of data processing: The purpose of data processing is that the Data Processor provides fund services to its members pursuant to the provisions set forth in Act XCVI of 1993 on Voluntary Mutual Insurance Funds (hereinafter Voluntary Fund Act) as well as services which complement, supplement or replace social security benefits.

Scope of data subjects: every fund member, the death beneficiary and the beneficiaries of the benefits, in the absence of a death beneficiary the fund member's heirs, authorized persons and legal representatives, persons acting on behalf of employer members, beneficial owners and contact persons.

Processing data pertaining to fund members (clients)

Data processing is a condition to establishing, maintaining and performing the contract. The purpose of processing data we request on our forms is to fulfil tasks pertaining to pension fund membership, especially to the establishment of the contract, keeping records, crediting payments, keeping the account, informing clients, settling of payments, collecting debts.

In case the e-mail service is requested, an agreement shall be made between the fund member and the Fund for the Fund to forward mail specified in the Statutes to the member electronically. In that case, the email address supplied by the fund member will be process for the purpose of the fulfilment of this agreement as well.

In case of online registration to client services, the personal information of the fund member, as well as all contractual information produced in connection with the fund membership shall also be processed for the purpose of fulfilling the service, as provided by the service terms.

2. Legal provisions stipulate certain obligations for the Pension Fund, for the fulfilment of which it is required that Clients' data be processed.

- > Therefore within the scope of **combating money-laundering and the financing of terrorism** it is compulsory to implement customer due diligence measures, i.e. to record Clients' specific data, to verify them against Clients' ID documents, and to monitor the business relationship.¹

Data of the private individual to be recorded are as follows:

- first name and surname,
- family name and first name given at birth,
- nationality,
- date and place of birth,
- mother's maiden name,
- home address, or residence in the absence thereof,
- type and number of ID document,
- copy of ID document in the event of applying for a housing loan.

¹ Act LIII of 2017 on the prevention and combating of money-laundering and terrorist financing

In addition to the above, it must be stated if the person acts for him/herself or for the real owner. If he/she acts for someone else, data required to identify the real owner must be supplied as well. Also, a statement must be made if someone's is a prominent public person. Such status may be verified by the Pension Fund by checking it in a valid database. In addition, the Pension Fund will copy the documents presented upon identification, record them in its files and keep them.

It is also mandatory to verify that Clients are not included in the list of persons under restrictive measures pertaining to finances and property (lists pertaining to sanctions).²

- > Pursuant to the regulation on [the exchange of information related to financial accounts in taxing issues among authorities](#)³ the Pension Fund is obliged to obtain information from the fund member on his/her tax residence. In the event of foreigners the Pension Fund will report data to the Hungarian tax authority. Data concerned shall be as follows: account holder's name, address place and date of birth, tax ID, and data pertaining to the account. The Hungarian tax authority will share such data with the relevant country's tax authority.
 - > If the fund member supplies a [direct debit order](#) for the collection of payments, it is necessary to complete the form containing data required by legal provisions, supplying data pertaining to the paying party, the beneficiary and the client who is in a contractual relationship with the beneficiary and forwarding such data to the designated account-holding bank.
 - > If the Client [files a complaint](#), records of incoming complaints must be kept and stored for five years. In the event of a complaint made over the telephone, the Pension Fund will record the call and store it for five years.
 - > Pursuant to the decree of the Hungarian National Bank specifying the obligation to supply data it is mandatory to record the sex of the fund member, and the Pension Fund is obliged to supply statistical data which do not contain personal data to the Hungarian National Bank.
- 3.** Data processing will occur based on the Pension Fund's [legitimate interest](#) if the Pension Fund has such justifiable interests which substantiate the use of data. They are as follows:
- > [Acquisition purpose](#): the Pension Fund has a legitimate interest in informing its Clients of more of its own products, of its new products, services and campaigns, in encouraging Clients to maintain or increase deposits, to conclude more contracts, thus increasing its clientele, and ensuring the loyalty of its existing clients. To this end the Fund uses client data available to them (name, contact information, DOB, address, telephone number, e-mail address, deposits) to send information to clients. In the case of a campaign based on the optimization of tax refunds related to contributions, the Pension Fund determines the group of stakeholders who are most likely to take advantage of this opportunity and make extraordinary contributions in order to credit the highest amount of tax refunds based on the age, address and membership fee payments of the customers. To encourage the entry of new fund members and new deposits we will launch promotional campaigns from time to time. We will process the data of fund members who meet the conditions in connection with the campaign, the drawing, and the delivery of the gift in order to fulfill the contract between the Parties by participating in promotional campaigns. Such data will be: name, contact information (address, e-mail address, telephone number), payment information.
 - > [Market polls, product and business development, development of services](#): the Pension Fund has a legitimate interest in processing its Clients' data (name, contact information, DOB, address, telephone number, e-mail address, deposits) for the purposes of improving its existing products and services, because it contributes to increased levels of client satisfaction, the long term retention of contracts and regular payment of fees. To do so, we approach our clients using questionnaires with the purpose of market poll and quality assurance online, in e-mails, over the telephone and through the post, and ask their opinion about the Pension Fund, pension-related savings and certain services of the Pension Fund. The Pension Fund may employ third parties in getting the questionnaires to clients and assessing them. Data processing will last until the replies are evaluated.
 - > [Clearing up and preventing frauds](#): The Pension Fund functions a comprehensive system for preventing and clearing frauds, from telephone calls with the purpose of prevention after the contract is concluded through the inspection of suspicious cases to amending processes using the consequences drawn, including the training of persons involved. It is in the company's best interest to manage suspicious cases properly, thus preventing the company from financial and reputational losses. To prevent, clear up and manage frauds it might be necessary to use the available data of persons involved in the issue.
 - > [Instituting civil and penal proceedings in connection with contracts](#): as long as the contract exists and after its termination data will be stored as long as civil and criminal claims possibly arising in connection with the contract lapse: the Pension Fund is required to keep data until punishability lapses, because it may arise that a crime was committed when payment was made and data will be needed in a subsequent procedure as evidence.

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. For more details, please check the Section VII. Rights of individual

4. Processing data by way of consent

- > [submitting an e-mail address and a telephone number](#)
If you supply your email address and telephone number, we will inform you more quickly and efficiently about your contract and the services you apply for. You can withdraw your consent any time, if you request that your contact information be deleted. In this case we will send you information in postal letters. If you have also required our e-mail service, your email address is processed for the purpose of fulfilling this contract as well. The email address shall be deleted only in case of the cancellation of this service, provided there is no other legal basis for data processing.
- > [in the event of a transfer](#)
If a fund members requests that we proceed in regard to his/her transfer at the transferring fund, consent is needed to hand over his/her data to the transferring company

² Act LIII of 2017 on the implementation of financial and property restrictive measures ordered by the European Union and the Security Council of the UN

³ Act XXXVII of 2013 on certain regulations of international public administration related to taxes and other public duties

> data processing for direct marketing purposes

We ask our clients' consent so that we can send them electronic messages to their email addresses for promotional purposes in connection with our products, services and on-going campaigns.

In addition, we ask our clients' consent so that we can hand over their names and contact information to the member companies of Alfa Group so that the member companies of the Group can approach them by post, over the phone or electronically, with their own products and services with the purpose of acquisition.

Member companies of the Group are as follows: Alfa Vienna Insurance Group Insurance Ltd., VIG Asset Management Hungary Closed Company Limited by Shares, Alfa VIG Pension Fund Management Ltd.

Such consent may be withdrawn any time without restrictions, which will not affect the lawfulness of data processing completed in compliance with the consent before the withdrawal.

Data processing in the event of beneficiaries/heirs

The fund member may assign a beneficiary in the contract, and data are required to identify and contact the beneficiary.

In the event of the fund member's death, data are needed to effect payment to the beneficiary or the heir, in addition, we request data to perform client due diligence stipulated in the Anti-Money Laundering Act to prevent and ward off money laundering.

Legal grounds for data processing: the fulfilment of the agreement and legal requirements.

As long as the contract exists and after its termination during the limitation period settlement issues, claims, cases of suspected fraud may necessitate the use of data for the Pension Fund's legitimate interest for the purposes of inspection and settlement, and to enforce civil and penal claims. The Pension Fund is required to keep data until punishability lapses, because it may arise that a crime was committed when payment was made and data will be needed in a subsequent procedure as evidence.

Data processing in the event of a legal representative/ authorized person

If a representative is acting on behalf of the client, we will request data to identify the representative, and to verify his/her entitlement to represent the client. We will use such data to fulfil the requested services and, if necessary, to perform due diligence required by the law.

Legal grounds for data processing: the fulfilment of the agreement and legal requirements.

As long as the contract exists and after its termination during the limitation period settlement issues, claims, cases of suspected fraud may necessitate the use of data for the Pension Fund's legitimate interest for the purposes of inspection and settlement, and to enforce civil and penal claims.

Data processing in the event of witnesses

In compliance with the law a private document having full documentary evidence is needed to apply for the service of sending documents electronically, to designate a beneficiary, and to hand over data qualifying as confidential fund information. In addition, in order to prove that the necessary statements were made, the internal regulations of the Pension Fund specify instances when a private deed with absolute probative value is required. This shall be met by two witnesses attesting with their signatures that the client signed the statement with his/her own hand in their presence, or admitted his/her signature as his/her own. The form contains the name, address and signature of the witnesses.

Legal grounds for data processing: the legitimate interest of the data controller in the verifiability of statements.

Employer partners

Data processing in the case of

- > representatives of employer partners
- > actual owners (in the absence of which executives)
- > contact persons

Employer partners are companies that conclude an agreement with the fund on employer contributions or a donation agreement. With regard to these companies we will process the data of private persons listed above for the purpose of fulfilling the agreement and in compliance with legal stipulations.

The following data of the person acting on behalf of the company will be processed pursuant to the Act on Money Laundering:

- > family name and first name
- > family name and first name given at birth
- > nationality
- > home address, or residence in the absence thereof
- > date and place of birth
- > mother's maiden name
- > number of ID card
- > number of address card

The following personal data of the actual owner (in the absence of which executives) will be processed pursuant to the Act on Money Laundering:

- > family name and first name
- > family name and first name given at birth
- > nationality
- > home address, or residence in the absence thereof
- > date and place of birth
- > statement if someone is a prominent public person (a prominent public person or a close relative thereof)

The following data of the contact person designated by the employer will be processed to process the reports and deposits forwarded by the employer:

- > name
- > telephone number
- > e-mail address
- > e-mail address of the person supplying data

Legal grounds for data processing: the fulfilment of the agreement and legal requirements (Act on Preventing and Combating Money Laundering and Terrorist Financing), as well as the legitimate interest of the Data Controller (execution of the contract, maintaining contact with designated persons, cooperation).

PROCESSING THE DATA OF FUND MEMBER ORGANIZERS AND CONTRACTED PARTNERS

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

Fund member organizers

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

- > to fulfil rights and obligations arising from the permanent agreement for intermediaries.
- > to comply with accounting regulations
- > to enforce live claims as well as civil and criminal claims against the „natural person” and member organizers.
- > to investigate the intermediary activity and to clear up, manage and 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 performing tasks related to the contracts, the payment of commissions, and the return of unauthorized commissions.
- > the authorities who are entitled to access the data based on legislation, such as the MNB, the NAV, investigative authorities, prosecutors, courts.

Data processing will last as long as the agreement is in force and as long as claims may be enforced in relation to the contractual relationship after termination thereof. Pursuant to the law accounting documents will be kept for eight years.

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 in connection with performing the terms of the agreement, settlements related to the agreement, and enforcing any civil or criminal claims.

In the case of an individual entrepreneur partner, we process identification data and data generated during the performance of the contract. (Legal basis: to fulfill the contract).

In the case of representatives, the purpose of data processing is to ensure the valid execution of the contract, and its legal basis is to fulfill the legal obligation contained in the Civil Code.

Legal grounds for data processing: the fulfilment of the agreement and legal requirements (Accounting Act).

In the case of accounting documents generated during the contractual legal relationship, the purpose and its legal basis of data processing is to fulfill the Accounting legal Regulations.

Data will be processed as long as the agreement is in force, and as long as claims may be enforced in relation to the contractual relationship after termination thereof. Pursuant to the law accounting documents will be kept for eight years.

SOUND RECORDING⁴

We record your conversation with our Call Center for quality assurance purposes, which includes the following: verification of the measures taken, recall of the content of the statement made, identification of the person making the statement and the time of the statement, protecting the rights of the participants in the conversation, and monitoring the work of the Call Center staff.

The legal grounds of the data processing is 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 cannot provide call center service but you can contact the Company by post or e-mail.

You have the right to object to data processing based on your own legitimate interests for any reasons related to your own situation, for more details, please check the section if Individual Rights.

Calls conducted with our sales Call Center 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 Pension Fund as long as data pertaining to the contract are kept. It is in the interest of the Pension Fund to retrace the calls which prove to be evidence as well as the statements made during the calls as long as the contract exists and after its termination as long as civil or criminal claims in connection with the contract become void.

If the purpose of the call is to make a complaint, we will record and store it based on legal obligation.

If the person affected by the call is not a client of ours, we will keep the call for five years to prove and satisfy possible future claims.

In the event of a complaint made over the telephone pursuant to the law it is mandatory to record the call and keep it for five years.

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

⁴ Act V of 2013 on the Civil Code 2:48 §

DATA PROCESSING ON THE WEBSITE

The website of the Pension Fund is operated by Alfa VIG Pension Fund Management Ltd. The servers are provided and operated by Alfa Vienna Insurance Group Insurance Ltd.

Online Client Service

Fund members registering on the website to use the online client service can access it by entering their username and password. The online client service account shows the fund member's personal and membership data, his/her pension fund deposits and the consignments, and it is also possible to amend some data. Data shall be processed in relation to the performance of the fund membership contract.

Cookies

For the appropriate operation of the website it is necessary to place data files called "cookies" on your computer just as other websites and internet service providers do. For more detail about the cookie management, please [click here](#).

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 Pension Fund is entitled to use a data processing company to perform technical activities pertaining to data management operations. The majority of administrative activities and certain expert tasks have been outsourced by the Pension Fund to Alfa VIG Pension Fund Management Ltd.

Pursuant to the law we can only transfer your data to others in the following instances:

- > the client gives his/her consent to it in an appropriate manner (in the form of an authentic instrument or a private document having full documentary evidence)
- > the law gives permission to it

Recipients might be as follows:

- > service providers engaged in outsourced activities: external service providers who perform activities related to the Pension Fund's activities, where the performance of such activities requires data management or data processing (e.g.: printing house, administrative service provider). The list of partners performing outsourced activities is published on the Pension Fund's website.
- > professionals, such as lawyers and auditors performing professional activities.
- > authorities and courts listed in the act regulating the activities of the Pension Fund, within the scope of proceedings as specified by the law. (e.g.: Hungarian National Bank, Tax Authority, authority acting as a financial information unit, Hungarian Competition Authority, Financial Arbitration Board, authorities investigating a case in criminal proceedings, the public prosecutor's office, national security service, public notary acting with regard to an estate, the public guardianship authority, a court acting in penal or civil proceedings, as well as in cases of bankruptcy or liquidation) third parties specified in a consent given by the fund member

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

Your data will not be transferred.

VI. DATA RETENTION PERIOD

If we process data in connection with the fulfilment of the contract, we will process data as long as the contract exists, or until such time as civil or penal claims may be enforced with regard to the contractual relationship. It also refers to the event when we do not accept the application and the contract shall not be concluded. We will keep data until the end of the limitation period even in such cases.

Data retention period in the case of fund members: 10 years after the termination of the contract and the relevant settlement.

The data retention period shall be extended by any complaint, litigation or criminal proceedings started in connection with the agreement within the data retention period.

In the event of data processing specified by the law, the law itself shall determine the duration until data must be kept.

Pursuant to the Accountancy Act all accounting documents, including the contract itself, must be kept for eight years. Pursuant to the regulations controlling measures necessary for the purposes of the fight against anti-money laundering and the financing of terrorism, data recorded within the scope of such purposes data must be kept for eight years after the termination of the contract. The complaint as well as the reply given thereto must be kept for five years in compliance with the law.

If data management is based on consent, it will be valid as long as you withdraw your consent.

Consent to the use of personal data for marketing purposes and any other data processing consent given in the course of fund membership will be valid as long as the contract exists and will automatically be no longer valid when the contract is terminated. Prior to such date the client has the right to withdraw his/her consent any time without any restrictions and without offering an explanation. In this case the consent will be no longer valid once the client submits his/her withdrawal. If data becomes necessary for the purposes of activities serving the Pension Fund's legitimate interests, data may be deleted after such legitimate interests cease to exist.

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 Pension Fund 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,

For example: Upon concluding the contract you gave us your data and your consent that we can send you promotional materials electronically in the form of emails. If you withdraw your consent, you will not get any marketing messages in emails from us in the future, but we cannot delete your data, because we will need them for the purposes of fulfilling the contract as long as the contract exists.

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 Pension Fund's legitimate interest, and you object to data processing, data processing will be restricted until we establish if the Pension Fund'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 or profiling. We use our clients' personal data (such as age and address) as well as data pertaining to deposits to deliver tailor-made communication to our clients in our marketing activities and communication regarding with the Pension Fund membership, payments, and related discounts. The legal ground to such activity is the Pension Fund's legitimate interest in properly informing its clients and encouraging membership fees.

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.