

Effective: 14 October 2025

To ensure secure processing and protection of your personal data is of primary importance to us.

For this purpose, data processing is carried out in all cases in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR) and Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter: Information Act). Accordingly, we ensure that the personal data provided are processed solely to the extent necessary for the execution of the relevant process or measure. We take all technical and organizational measures to prevent unauthorized persons from accessing personal data.

This Privacy Notice has been prepared in order to provide you with the necessary information regarding what happens to your personal data once it has been provided to Alfa Voluntary Pension Fund (hereinafter: Pension Fund or Data Controller).

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, P.O. Box 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. PURPOSES OF AND LEGAL GROUNDS FOR PROCESSING DATA AND CATEGORIES OF DATA SUBJECTS

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.

The lawfulness of data processing is further ensured by the fact that the GDPR clearly defines the legal bases under which personal data may be processed.

Such legal bases may include

- ▶ the data subject's consent,
- ▶ a legal obligation prescribing the purpose of the processing,
- ▶ the necessity of processing for the preparation or performance of a contract,
- ▶ the necessity of processing for the legitimate interests pursued by the Controller or by a third party.

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 the data requested on our forms is to fulfil the tasks related to voluntary pension fund membership, in particular the conclusion of the Contract, keeping of records, crediting of contributions, account management, providing information on matters and events related to the member's contract or the requested service, and executing payments.

– In connection with the performance of the contract, in the case of e-post service, the Pension Fund transmits the documents specified in the Articles of Association electronically to the Member. In this case, the e-mail address provided by the Member is also processed for the purpose of providing this service.

– In the case of online customer service registration, the Member's personal data as well as contractual data related to membership are also processed for the purpose of providing the service, in accordance with the conditions set forth in the terms of service.

– For the purpose of optimizing tax refunds, the Pension Fund identifies those Members, on the basis of their age, address and contribution payments, who are expected to make use of this opportunity and to make extraordinary contributions in order to achieve a higher amount of tax refund.

– For the purpose of conducting a gift or prize campaign, the data of Members meeting the conditions set out in the campaign rules are processed for the purposes of the draw, the delivery of the prize, and the fulfilment of tax obligations related to the prize. Participation in the campaign is established through the implied acceptance of the campaign rules. Categories of data processed: name, contact details (address, e-mail address, telephone number), contribution data.

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

¹ Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (hereinafter: Pmt.)

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.

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 sanctions²).

- ▶ Pursuant to the regulation on the exchange of information related to financial accounts in taxing issues among authorities³ 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. The Data Controller also has a legitimate interest in collecting outstanding debts, including recording arrears, sending payment reminders, and initiating legal proceedings if necessary.
- ▶ **Instituting civil and penal proceedings in connection with contracts:** During the term of the contract, as well as after its termination, within the general limitation period, settlement issues, claims or suspected fraud cases may arise, the investigation, resolution, or enforcement of civil or criminal claims of which require the use of personal data in the legitimate interest of the Pension Fund. If there is a suspicion of a criminal offence

² Act LII of 2017 on the Implementation of Financial and Property Restrictive Measures Ordered by the European Union and the United Nations Security Council

³ Act XXXVII of 2013 on Certain Rules of International Administrative Cooperation in Taxation and Other Public Duties

during the membership period or in connection with a payment, the Pension Fund is obliged to retain the relevant data until the statute of limitations for criminal liability has expired, as such data may be required in subsequent evidentiary proceedings. Accordingly, the data processed in connection with the contract will be retained by the Pension Fund until the statutory deadline for the enforcement of civil or criminal claims has expired.

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

▶ 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

A Member may designate a beneficiary under the contract, in which case it is necessary to provide the data required for the identification of the beneficiary and for establishing contact.

In the event of the Member's death, the processing of the heir's or the person entitled to payment's data is required for the execution of the payment, as well as for fulfilling the statutory anti-money laundering obligations (customer due diligence as set out in the AML Act). The legal basis for processing in this case is the fulfilment of a legal obligation under the AML Act, as well as the legitimate interest of the Pension Fund in performing the contract.

The data of beneficiaries and heirs are retained for 10 years following the termination of the contract, in accordance with Sections 56–58 of the AML Act.

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

If a representative acts on behalf of the Client, the data required for the identification of the representative and for verifying the authorization to represent are requested.

Such data are used for the purpose of performing the requested service and, where applicable, for fulfilling the customer due diligence measures prescribed by law. The legal basis for processing is the legitimate interest of the Data Controller in fulfilling contractual obligations.

The data of authorized representatives are retained for 10 years from the termination of the contract, in accordance with Sections 56–58 of the AML Act.

Data processing in the event of witnesses

Pursuant to law, a private document with full probative force is required for the use of electronic document delivery services, the designation of a beneficiary, and the release of data qualifying as pension fund secrets. In addition, in order to ensure the subsequent verifiability of declarations, the internal regulations of the Pension Fund also prescribe cases where a private document with full probative force is necessary.

This requirement is fulfilled if two witnesses certify with their signatures that the Client has signed the declaration in their presence in his/her own handwriting, or has acknowledged the signature as his/her own. The names, addresses and signatures of the witnesses appear on the form.

The legal basis for processing is the statutory requirement, as well as the legitimate interest of the Data Controller in ensuring the verifiability of declarations.

The data of witnesses are retained for 10 years from the termination of the contract, in accordance with Sections 56–58 of the AML Act.

Processing of Data in the Case of 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
- ▶ Signature

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
- ▶ Signature

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.
- ▶ reporting intermediary activities to authorities, preventing, detecting, treating and, if necessary, investigating fraud (abuse).

Legal grounds for data processing:

- ▶ data processing required for fulfilling the agreement for intermediaries
- ▶ compliance with legal obligations related to tax payment regulations (Accounting Act⁴)
- ▶ 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. The retention period for accounting documents and data is 8 years.

Contracted partners

For service providers having a contractual relationship with the Pension Fund, the identification data and signatures of the representatives acting at the time of contract conclusion, as well as the identification data and contact details of the designated contact persons and contributors involved in performance, are processed. In the case of sole proprietor partners, the identification data and the data generated during the performance of the contract are processed on the legal basis of contract performance.

For representatives, the purpose of processing is to ensure the valid conclusion of the contract, the legal basis of which is derived from the statutory provisions of the Civil Code and from the legitimate interest of the Pension Fund in verifying the validity of representation. For contact persons and contributors involved in performance, the legal basis for processing is the legitimate interest of the Data Controller related to the performance of the contract (execution of contractual tasks, maintaining contact and cooperation with the persons designated for such purpose).

For accounting documents created in the course of the contractual relationship, the purpose of processing is the fulfilment of the obligations set out in the Accounting Act, with the legal basis being compliance with a legal obligation.

Data processing lasts for the duration of the contract and, following its termination, until claims arising from the contractual relationship can no longer be enforced⁵. The retention period of data and documents qualifying as accounting records is 8 years, in accordance with the Accounting Act.

IV. SOUND RECORDING

Our call center conversations are recorded on the basis of the data processing purposes and legal grounds detailed below:

1. Recording of telephone conversations during customer service

The purpose of processing is to provide information and assistance to Data Subjects, and to handle and respond to inquiries concerning pension fund services, products, and procedures via telephone. The legal basis for processing is the consent of the Data Subject, which is granted through implied conduct by continuing the call after the provision of the information notice. If you wish to avoid the recording, we cannot provide telephone assistance;

⁴ Act C of 2000 on Accounting

⁵ Section 6:22(1) of Act V of 2013 (Civil Code)

however, you may contact us by post or by e-mail using any of our available contact details.

The audio recordings are retained during the existence of the contractual relationship and thereafter on the basis of the legitimate interest of the Pension Fund, until civil or criminal claims arising in connection with the contract can no longer be enforced. The legitimate interest of the Pension Fund is to ensure that statements related to the contractual relationship and other communication content serving as evidence can be retrieved in cases of exclusion, detection, or prevention of abuse or fraud.

2. Complaint handling

The purpose of processing is to receive complaints submitted by telephone. The legal basis for processing is the fulfilment of the legal obligation applicable to the Data Controller, under which the Pension Fund records the telephone communication with the Data Subject and retains it for five⁶ (5) years following the closure of the complaint procedure.

3. Quality assurance, which includes:

- ensuring the retrievability of the exact content of the conversation for the assessment of complaints and legal claims, and
- monitoring, evaluating, and training the employees conducting the calls.

The legal basis for processing is the legitimate interest of the Pension Fund in ensuring the retrievability of calls, the subsequent verification of statements made, and the improvement of the quality of customer service.

4. Initiating welcome calls

The purpose is to enable the Data Controller to verify the authenticity and quality of its sales activities, to assess the validity of newly concluded contracts, and to exclude transactions that do not serve the interests of the clients or the Data Controller. The legal basis for processing is the legitimate interest of the Data Controller in ensuring honest, fair, and professional conduct, as well as in managing the risks of the risk community organized by the Data Controller. The audio recordings of such calls are retained for five (5) years following the termination of membership.

The Data Subject has the right, on grounds relating to his or her particular situation, to object at any time to processing based on legitimate interest.

V. 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. Information regarding cookie management is available on the Pension Fund's website under Legal Documents.

VI. 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.

Recipients of personal data processed in connection with a contract may include data processors who, based on an agreement with the Data Controller, process personal data on its behalf for a specific purpose defined by the Data Controller. If the performance of the task so requires, personal data may be disclosed to data processors to the necessary extent. The Data Controller engages only those data processors who provide adequate guarantees regarding the protection of personal data. Data subjects may request information about the recipients or categories of recipients involved in the processing in the context of exercising their access rights.

Categories of third parties, recipients, or data processors may include, but are not limited to, the following:

1. Service providers performing outsourced activities as data processors:

- (a) External service providers acting on the basis of a legal authorization or legitimate interest, performing tasks related to the Data Controller's activities that involve data processing or data management (e.g., printing or administrative services),
- (b) Assigned professionals performing various expert tasks.

2. Partners involved in the fulfillment of a contract: Based on the legal basis of data processing for the performance of a contract, these may include partners responsible for client communication, record maintenance, and mediation purposes, with whom the Data Controller has a contractual relationship and who are registered in the intermediary register by the Hungarian National Bank.

3. Third parties and recipients based on a legal obligation: Personal data may be disclosed to third parties and recipients in accordance with statutory requirements, such as supervisory authorities, courts, or authorities acting within legally defined proceedings regulating the Data Controller's activities (e.g., Hungarian National Bank, tax authorities, financial intelligence units, Hungarian Competition Authority, Financial Arbitration Board, investigative authorities, public prosecutors, national security services, notaries handling probate cases, courts in criminal or civil proceedings, etc.).

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

Your data will not be transferred.

⁶ Section 29/A(4) of Act XCVI of 1993 (on Voluntary Mutual Insurance Funds)

VIII. DATA RETENTION PERIOD

If personal data is processed in connection with the performance of a contract, such processing shall continue for the duration of the contract, or until such time as it may be necessary for the assertion of civil law claims or for the conduct of criminal proceedings related to a criminal offense in connection with the contractual relationship.

In the case of fund members, the retention period of data is 10 years from the termination of the contract or from the completion of related settlements, in accordance with the provisions of the Pmt⁷.

Data provided during the online fund membership registration process is temporarily stored by the system. If the fund member does not complete the online registration or does not activate their online account within 72 hours from registration, the data recorded up to that point shall be automatically deleted after the 72-hour period.

For documents qualifying as accounting records, the retention period is 8 years⁸ from their creation.

Complaints and responses thereto must be retained for 5 years⁹ in accordance with statutory requirements. The retention period is extended if civil or criminal proceedings related to the contract are initiated within the retention period.

If data processing is based on consent, it shall remain in effect until the data subject withdraws their consent.

A fund member's consent for marketing purposes, as well as any other data processing consent given during membership, shall remain valid for the duration of the contract and shall automatically expire upon termination of the contract. Prior to this, the client has the right to withdraw their consent at any time, without limitation or justification.

IX. RIGHTS OF THE INDIVIDUAL

Right of access:

As a data subject, you have the right to request information on whether your personal data is being processed. If such processing is taking place, you are also entitled to receive information about the details of the processing (including the right to request a copy), specifically regarding the following:

- ▶ The purpose of the processing – the exact purposes for which your personal data is used.
- ▶ Categories of personal data – which categories of your personal data are being processed.
- ▶ Recipients or categories of recipients – to whom your personal data is disclosed or who has access to it.
- ▶ Transfers to third countries – i.e., countries that are not members of the European Economic Area, and, if applicable, the appropriate safeguards in place for such transfers.
- ▶ Planned storage period of personal data – or, if not possible, the criteria used to determine this period.
- ▶ Rights of data subjects – the rights relevant to the processing in question, conditions for exercising them, and the cases in which restrictions may apply.
- ▶ Right to lodge a complaint with a supervisory authority and available remedies.
- ▶ Source of personal data – if the data was not collected directly from the data subject, all available information regarding its source.
- ▶ Automated decision-making (including profiling) – the fact that automated processing is being used, the logic involved, the significance and expected consequences of such processing, and its potential impact on the data subject.

Upon request, a copy of the personal data held about you will be provided in paper or electronic form, depending on the type of documents and your request. Please note that the Data Controller may charge a reasonable fee based on administrative costs for additional copies.

Right to rectification:

Upon your request, any inaccurate personal data concerning you will be corrected or deleted. Additionally, upon your request, incomplete or partial personal data may be supplemented, provided that such supplementation is compatible with the purpose of the data processing.

If the rectification is likely to have a significant impact on your rights (for example, it may have legal consequences), the Pension Fund may request additional information from you to verify the legitimacy of the rectification.

Right to erasure (Right to be forgotten):

As a data subject, you may request the deletion of your personal data for the following reasons:

- ▶ The personal data are no longer necessary for the purposes for which they were collected or processed.
- ▶ The processing of the personal data is unlawful.
- ▶ You withdraw your previously given consent, and there is no other legal basis for the processing.
- ▶ You exercise your right to object (conditions for this are detailed in the section "Right to Object" below).
- ▶ The personal data must be erased in order to comply with a legal obligation under EU or Member State law applicable to the Data Controller.

In certain cases, legislation imposes an obligation on the Data Controller to retain personal data. In such cases, personal data cannot be deleted at your request. Furthermore, personal data may be lawfully processed after the termination of a contract if necessary to assert potential claims related to the contract (e.g., civil or criminal law claims), as the Data Controller has a legitimate interest in retaining such data. Such legitimate interest may include, for example, the recovery of services provided by the Pension Fund if, during or in connection with the use of such services, a criminal offense has occurred.

During this period, data will only be stored for the purpose of enforcing the potential claims mentioned above. Once the retention period has expired, and if no further lawful purpose or legal basis for processing exists, your data will be deleted.

Right to restriction of processing

You may request the temporary suspension of data processing by the Data Controller, either for certain or all of your personal data, if any of the following grounds apply:

- ▶ You contest the accuracy of the personal data processed by the Data Controller.
 - In this case, the restriction may remain in place until the accuracy of the data has been verified and the related examination is completed.
- ▶ The processing is unlawful, and you oppose the deletion of your personal data, requesting restriction of use instead.
- ▶ The Data Controller no longer needs to process your personal data (for example, because the purpose of the processing has been fulfilled or ceased), but you require the data to establish, exercise, or defend legal claims. In this case, it is sufficient for you to indicate this interest in your request; no further proof is required.

⁷ Sections 56–58 of Act LIII of 2017

⁸ Section 169(1) of Act C of 2000

⁹ Section 29/A(4) of Act XCVI of 1993

- The restriction will apply for the period necessary to establish, exercise, or defend legal claims.
- ▶ You have objected to the processing (see the “Right to Object” section).
 - In this case, the restriction applies during the period of assessment or investigation until it is determined whether the legitimate interests of the Data Controller override your rights and interests.

If the restriction must be lifted for any reason, you will be informed in advance, if possible, or at the latest at the time the restriction is lifted. The Data Controller has a notification obligation regarding the restriction of personal data in accordance with Article 19 of the GDPR.

Right to object

You may object to the processing of your personal data for reasons related to your particular situation (such as social position, employment, or private life) if the processing is carried out on the basis of the legitimate interests of the Pension Fund or a third party (for example, to exclude the sending of direct marketing messages or processing after termination of a membership agreement).

If you provide sufficient detail regarding the reasons arising from your personal situation for objecting to the processing of your personal data, the Data Controller will reassess its legitimate interests in light of your objection to determine whether such interests override your rights, freedoms, and interests.

Right to data portability

Upon request, the Pension Fund will provide the personal data you have supplied in a widely used, machine-readable format or transmit it directly to another data controller designated by you, provided that the technical and data security conditions are met.

This right does not apply to data not provided by you (e.g., personal data transmitted to us by an intermediary partner).

You may exercise your right to data portability only if the processing is based on your consent or necessary for the performance of a contract and the processing is carried out in an automated manner; this right does not extend to paper-based processing.

Withdrawal of consent

You may withdraw your consent at any time, without restriction, for data processed based on your consent. Withdrawal does not affect the lawfulness of processing carried out before the consent was withdrawn.

Automated decision-making, including profiling

In cases where the Pension Fund applies automated decision-making that has legal or similarly significant effects on you (e.g., automated decisions in the course of contract conclusion), you may request human intervention, express your point of view, and contest the decision.

The Pension Fund may evaluate and analyze the preferences, behavior, or other characteristics of the data subject using automated tools (such as software or algorithms) or in the context of individual business decisions. This allows the creation of profiles to provide personalized content, offers, or make individual decisions regarding the processing of data.

For marketing purposes, certain methods may be applied to evaluate the information you provide according to predefined criteria, which may serve as a basis for commercial solicitations. Data subjects have the right to object to such processing. During the evaluation, individual profiles are created to recommend products that best meet the needs of the data subject.

Detailed information about the suggested product will be provided, and you may choose not to request the service or indicate criteria you consider relevant in selecting the product.

Rights related to deceased persons' data

Within five years following the death of the data subject, any person authorized during the data subject's lifetime through an administrative authorization or in a public or fully probative private document submitted to the Data Controller is entitled to the following rights in accordance with Section 25 of the Infotv.:

- ▶ Request information about the processing of data, including requesting copies.
- ▶ Request rectification of inaccurate data.
- ▶ Request the deletion of data.
- ▶ Request restriction of processing if any of the grounds for restriction exist (see the “Right to Restriction of Processing” section for details).
- ▶ Object to the processing of personal data.

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

X. AUTOMATED DECISION-MAKING, PROFILING

In line with the purposes set out in this Data Processing Notice, profiling is applied to conduct campaign-based, personalized marketing communications based on consent more effectively.

Personal data (e.g., age, assets, membership fee payment method, reminders due to timely payment of membership fees, committed membership fee amount, actual monthly payment, maximum tax refund achieved in the given year, existence of online customer service or email registration, as well as membership logins in the past 12 months) are used to provide tailored information to the data subject regarding products and related benefits.

The legal basis for this processing is the Pension Fund's legitimate interest in appropriately informing its clients and encouraging timely membership fee payments, to which the data subject has the right to object.

XI. DATA PROCESSING FOR OTHER PURPOSES

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