

Effective from 13 May 2026

Secure processing and protection of your personal data is of primary importance to us. We therefore ensure that we only process the data you provide to the extent necessary for the implementation of the given process or measure, and we take all technical and organisational measures to prevent unauthorised persons from accessing it. We have prepared this privacy notice to provide you with the information you need about what happens to your data once you have provided it to our Company.

## I. DETAILS OF THE DATA CONTROLLER

Alfa VIG Pension Fund Management Ltd. processes your data; for the purposes of this notice, it qualifies as the data controller.

- ▶ Registered seat: 1091 Budapest, Üllői út 1.
- ▶ Postal address: 1399 Budapest, Pf. 717
- ▶ Telephone: 06-1-477-4890
- ▶ E-mail: [nypugyfelf@alfa.hu](mailto:nypugyfelf@alfa.hu)
- ▶ Website: [www.alfanyugdij.hu](http://www.alfanyugdij.hu)

## II. DATA PROTECTION OFFICER

- ▶ E-mail: [nyp.adatvedelem@alfa.hu](mailto:nyp.adatvedelem@alfa.hu)

## III. PURPOSE AND LEGAL BASIS OF PROCESSING

Data may only be collected for a clearly defined and specific purpose (purpose limitation) and processed in a manner that is compatible with that purpose. The lawfulness of data processing is further ensured by the fact that the law clearly defines the legal bases under which data may be processed:

- ▶ consent of the data subject,
- ▶ a legal requirement regarding the processing of the specific data set;
- ▶ data processing necessary for the performance of a specific contract;
- ▶ the Company's legitimate interest.

### III/1. DIRECT MARKETING PROCESSING

- ▶ To increase the number of pension fund contracts, the company collects data on interested private individuals, either directly from them or from third parties. The Company then contacts these individuals by telephone and/or email to acquire new business. This processing is based on the data subject's consent.
- ▶ The data concerned includes name, telephone number, email address, home address and date of birth.
- ▶ The source of the data may be online registration, telephone contact, personal contact, a database received from a third party or a public database based on the data subject's consent for this purpose.
- ▶ Consent to processing is valid for five years and must be renewed every five years; otherwise, it expires and the data will be deleted.
- ▶ Consent may be withdrawn at any time during the validity period, in which case the data subject will not receive any further advertising-related contact from us.

## IV. DISCLOSURE AND TRANSFER OF DATA TO AN EXTERNAL PARTY

As a general rule, access to personal data is limited to Company employees and officers who require it for their duties. However, in certain cases, data may be transferred to an external party. The Company may use data processors to carry out technical tasks related to processing operations.

### Recipients of personal data

- ▶ In case of direct marketing processing include external service providers performing tasks connected to the Company's activities where performing those tasks involves processing data (e.g. contractors operating IT systems or performing certain IT tasks).

## V. DATA TRANSFER TO A THIRD COUNTRY OR AN INTERNATIONAL ORGANISATION

No data transfers take place.

## VI. DATA RETENTION PERIOD

Direct marketing processing lasts for five years from the date that consent is given.

## VII. RIGHTS OF THE DATA SUBJECT

**1. Right of access:** you may request confirmation as to whether processing is ongoing. You may also request information on the following:

- ▶ The purpose of processing
- ▶ The categories of personal data concerned
- ▶ To whom we have transferred the data (including, in the case of transfers outside the EU, the safeguards)
- ▶ The retention period, or the criteria used to determine it if this is not possible
- ▶ If we did not obtain the data directly from you, the source of the data
- ▶ The rights available to you
- ▶ Whether automated decision-making and/or profiling is used, and the logic applied and the consequences

Upon request, we will provide you with a copy of your personal data.

**2. Rectification:** If you find that the personal data we hold about you is inaccurate or incomplete, you may request that we correct or complete it.

**3. Right to be forgotten:** upon request, we will delete your personal data if

- ▶ it is no longer necessary for the purpose it was recorded for;
- ▶ if you withdraw your consent and there is no other legal basis;
- ▶ if processing is based on the Company's legitimate interest and you object, unless there is an overriding lawful reason;
- ▶ if the data is processed unlawfully;
- ▶ if deletion is required by law; or if electronic services are offered to children.

If we must delete the data, we will take all reasonable steps, considering the available technology and the costs of implementation, to inform those to whom your data were disclosed of the deletion, and indicate the need to delete links to and copies of the personal data.

There are further limitations to deletion, such as when the data are necessary for the establishment, exercise or defence of legal claims or for reasons of public interest (e.g. public health, archiving for scientific or historical research purposes).

**4. Restriction of processing may occur in the following circumstances:**

- ▶ You contest the accuracy of the data and time is needed for verification.
- ▶ Processing is unlawful, but you request restriction instead of deletion.
- ▶ We no longer need the data for the original purpose, but you request retention for legal claims.
- ▶ Processing is based on the company's legitimate interest and you object. In this case, processing is restricted until it is determined whether the company's legitimate interest overrides yours.

Restriction means that we will only store the data unless you request further measures or unless the data are needed for legal claims, to protect the rights of others or for an important public interest.

**5. Right to object:** You may object at any time to the processing of your personal data based on the Data Controller's legitimate interests (including profiling, where applicable), for reasons related to your particular situation. In this case, the Data Controller may no longer process the data unless they can demonstrate compelling legitimate grounds for processing that override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims.

**6. Data portability:** You have the right to request that the data you have provided to us is processed over to you in an electronic format or transferred to another controller or processor, provided the technical and data security conditions are met. This request can cover data processed on the basis of your consent or for the performance of a contract by automated means.

**7. Right to lodge a complaint with a supervisory authority:** You may contact the Hungarian National Authority for Data Protection and Freedom of Information (NAIH).

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

Postal address: 1363 Budapest, P.O. Box 9

Website: [www.naih.hu](http://www.naih.hu)

## VIII. AUTOMATED INDIVIDUAL DECISION-MAKING, PROFILING

We do not apply automated decision-making or profiling in connection with the processing operations related to the purposes indicated above.

## IX. FURTHER PROCESSING PURPOSES

We will only use the data you provide us with for the purposes specified in this notice. Should we wish to use your data for purposes other than those indicated in this notice, we will provide you with separate information.