

OTP Bank Plc.

Supplemental Data Processing Information Notice

REGARDING PREPAID CARDS

This Data Processing Information Notice is a supplement to Annex 5 on data processing of the General Business Regulations of OTP Bank Plc. (hereinafter “General Privacy Notice”), regarding the specification of the terms of data processing performed during the provision of prepaid card services. This Data Processing Information Notice is to be applied together with the General Privacy Notice.

1 CONTROLLER AND ITS CONTACT DETAILS

1.1 Controller’s name: OTP Bank Plc. (Controller)

Registered office: H-1051 Budapest, Nádor u. 16, Hungary

Postal address: OTP Bank Nyrt. 1876 Budapest

Email: informacio@otpbank.hu

Telephone: (+36 1/30/20/70) 3 666 388

Website: www.otpbank.hu

Details of the Controller’s data protection officer:

Name: Zoárd Gázmár

Postal address: H-1131 Budapest, Babér u. 9, Hungary

Email: adatvedelem@otpbank.hu

2 PROCESSING OF THE DATA OF CUSTOMERS

2.1 Scope of Customers

During the provision of prepaid card services or when preparing to provide such services, the Controller processes the personal data of the following natural persons (hereinafter “Data Subject”):

- cardholder

2.2 Scope of data processed

During the provision of prepaid card services or when preparing to provide such services, in addition to the data groups specified in Section 2 of the General Privacy Notice, the Controller processes data concerning Data Subjects which belong to the following data groups:

- data related to card use and
- data accessed by the Controller during the performance of the contract for the purposes of preventing, detecting and investigating fraud committed with the prepaid card.

The exact set of data processed during the provision of prepaid card services or when preparing to provide such services is contained in:

- the General Privacy Notice, and
- a Prepaid Gift Card Contract or
- a WORLD JUDO TOUR Prepaid Card Contract and
- any other documents generated during the performance of the contract aimed at providing prepaid card services.

Data related to card use:

- Card number and account number
- Cardholder's customer number
- Card limits and other data
- card status change dates

2.3 Purposes of processing

In addition to the purposes specified in Section 3 of the General Privacy Notice, the Controller processes the data defined in Section 2.2 for the following purposes or as defined therein:

- the detection and prevention of the items set out in Section 3.1. c) of the General Privacy Notice, especially fraudulent customer behaviour damaging the Bank's interests,
- prevention, detection and investigation of payment fraud.

During the present data processing, the Controller does not carry out data processing for the purposes listed in Section 3.1 (e) of the General Privacy Notice.

2.4 Legal bases for processing

When providing prepaid card services or when preparing to provide such services, the Controller processes the Data Subjects' data based on the legal grounds listed in Section 4 of the General Privacy Notice.

The Controller processes the personal data specified in Section 2.2 primarily on the basis of preparations for contracting and contract performance. In other cases, the data categories processed on the legal basis concerned are specified in this Information Notice.

2.4.1 Preparations for the conclusion of contracts for the provision of prepaid card services and the performance of such contracts

The Data Controller processes the personal data specified in the Prepaid Gift Card Contract or in the Card Contract forms for the purposes of preparing for contracting and for performing the Contract, including the enforcement of the rights and claims arising from the Contract and the submission of legal claims.

To achieve the above purpose, the Controller performs, in particular, the following:

- identification of the Data Subject based on personal identification data in order to prepare the contract.

The detailed conditions for providing the services under the Agreement are set out in the Debit Card Business Regulations (hereinafter: Business Regulations) and the documents referred to therein.

2.4.2 Mandatory processing

Beyond the legal regulations listed in Section 7 of the General Privacy Notice, the Controller processes data in accordance with the following during the present data processing:

- Pursuant to Act LXXXV of 2009 on the Pursuit of the Business of Payment Services, the Controller shall process the personal data provided for in Section 2.2, therein especially any data accessed by it in order to prevent, detect and investigate prepaid card fraud for the purpose of preventing, detecting and investigating payment fraud.

2.4.3 The legitimate interests of the Controller

In addition to the legitimate interests specified in Section 8 of the General Privacy Notice, the Controller shall process the personal data of Data Subjects specified in Section 2.2 based on the following legitimate interests.

The Controller shall keep records of confirmed past fraud events and confirmed fraud attempts associated with the Data Subject. It shall also keep on record historic data suggesting the manipulation or other misuse of data. The Controller processes the data in its records based on its legitimate interest of rating the Data Subject for future transactions, performing analyses and complying with other obligations.

The Controller shall process such data for a period of five years of becoming aware of such actual or attempted fraud.

3 RECIPIENTS OF PERSONAL DATA

Except for public authorities, defined in legislation and/or a binding legal act of the European Union, that demand personal data from OTP Bank Plc. for the purposes of their investigations of individual cases, the Controller shall forward the personal data of the Data Subjects to the following third persons/entities:

- *Mastercard Europe SA. (independent controller)*

Within the scope of its operations as credit institution, the Controller will also use the following data processor in addition to the data processors specified in Annex 2 of the General Business Regulations:

Name: International Judo Federation

Address: H-1051 Budapest, József Attila utca 1

Activity: delivering prizes and paying remuneration to awarded competitors, coaches and Partner staff members at official events organised by the Partner (WORLD JUDO TOUR competition series).

This Data Processing Information Notice enters into force on *15 January 2023*.

Upon the entry into force of this Data Processing Information Notice, the Data Processing Information Notice regarding Prepaid Cards effective since *17 June 2019* shall be repealed.

Budapest, *15 November 2022*