

Privacy Policy of GIRO Elszámolásforgalmi Zártkörűen Működő Részvénytársaság related to its certain services

Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("**GDPR**") ("**Policy**"). .

1. INTRODUCTION, BACKGROUND

This Privacy Policy was drafted and issued by GIRO Elszámolásforgalmi Zártkörűen Működő Részvénytársaság ("**Controller**" or "**GIRO**") in order to provide data subjects with appropriate information on the processing of their data and their rights in relation to the processing of their data pursuant to Articles 13 and 14 of the GDPR in relation to the processing of the personal data detailed below.

GIRO shall process the personal data received in accordance with the applicable provisions of laws, in particular the provisions of the GDPR, Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information ("**Info Act**") and Act CCXXXVII of 2013 on Credit Institutes and Financial Enterprises ("**Hpt**").

The detailed provisions on the processing based on the Hpt. (purpose, term of processing, potential cases of transferring the personal data processed) are governed by, inter alia, Hpt. Sec. 68 and Sec. 166/A.

This Policy includes the details of processing of personal data arising in the course of Controller's services provided to each client.

2. NAME AND CONTACT DETAILS OF CONTROLLER AND ITS REPRESENTATIVE

Pursuant to GDPR, Art. 4. par 7, in regards the subject processing(s) the following company is deemed Controller:

GIRO Elszámolásforgalmi Zártkörűen Működő Részvénytársaság

- registered seat: 1054 Budapest, Vadász str. 31.
- company reg. No.: 01-10-041159
- tax ID No.: 10223257-2-41
- e-mail address: info@mail.giro.hu
- website: http://www.giro.hu
- phone No.: +36 (1) 428 5600
- representative's name: dr. Zsolt Selmeczi-Kovács
- representative's contact details: +36 (1) 428 5600.

3. CONTACT DETAILS OF THE DATA PROTECTION OFFICER

dr. Brigitta Bölkei

- address: 1054 Budapest, Vadász str. 31.
- phone No.: +36 (1) 428-5695
- telefax No.: +36 (1) 269 5458
- e-mail address: dpo@mail.giro.hu

4. **PROCESSING RELATED TO EACH SERVICE OF GIRO**

4.1 **Interbank Clearing System**

The Bank Interbank Clearing System ('ICS') operated by GIRO is a payment system for the interbank clearing of domestic HUF transfers and direct debits. However, in this regards, there are personal data processing operations at several sub-areas of the process which are performed by GIRO as Controller, and it is therefore, notifying the data subjects on these processing operations is justified.

The key information on data processing related to the service are set out in the table below:

Processing arising regarding the ICS						
Name/type of processing	Scope of data subject to processing	Purpose of processing	Legal basis of processing	Term of processing	Recipients of data / Categories of recipients	Other notes
Clearing and ICS connection agreements	<p>Regarding non-disclosure declarations, details of representatives of prospective clearing members: name, personal identification details (name, place and date of birth, mother's name, address); signature.</p> <p>Persons authorised to sign on behalf of clearing members: name, signature.</p> <p>Contact persons: name, contact details (e-mail address, work address, phone No., telefax No.).</p>	<p>The conclusion of clearing and ICS connection agreements with individual clients, the maintenance of the contractual relationship and the related exchange of information between the parties.</p> <p>In regards the transfer of contact persons' details, compliance with GIRO's legal obligations.</p>	<p>GIRO's legitimate interest.</p> <p>Non-disclosure declarations and signature specimen and signature notification cards constitute the legitimate interest. Legal obligation on the GIRO to transmit contact details.</p>	<p>In regards the contact details, by 31 December of the 5th year following the termination of the contractual relationship with the client or the date on which the client becomes aware of the termination of the contact person position.</p> <p>For another 2 months in backup.</p>	<p>In regards the clearing and ICS connection contracts, personal data are collected by GIRO on the basis of the legal obligation to the National Bank of Hungary and the Budapest Metropolitan Court (in case of contact persons provided on the datasheet related to Act XXIII of 2003 on the Finality of Payments).</p>	<p>The source of the data is third parties: the GIRO's contractual partners, the individual clearing members.</p> <p>Contact details may appear in the course of the "Using GIROOnline" data processing.</p>

PRIVACY POLICY

Processing arising regarding the ICS						
Name/type of processing	Scope of data subject to processing	Purpose of processing	Legal basis of processing	Term of processing	Recipients of data / Categories of recipients	Other notes
					In addition, the personal data of contact persons are also published on the ICS's closed interface (Data of the designated persons responsible and contact persons in the context of the settlement process and their deputies in the case of the Data Sheet for the Clearing Officer, Giro Officer, Crisis Officer and their deputies).	
Operation of the ICS system	In the course of the operation of the ICS system, GIRO will, during each clearing transaction - as joint data controller with the clearing members, processes the personal data contained in the transfer or collection orders received from the clearing members.	Execution of individual clearing transactions to facilitate clearing members comply with their legal obligations.	Compliance with the legal obligations of GIRO and each clearing member.	From the date of execution of the subject transaction, for the forfeiture deadline as per the civil law (5 years). For another 2 months in backup.	The data shall be sent to each institute involved in a specific transaction as a participant in the ICS. Detailed information on the ICS participants are provided in the Validation table	The source of the data is third parties: contractual partners of GIRO, individual clearing members. GIRO is deemed a joint controller with each clearing member.

PRIVACY POLICY

Processing arising regarding the ICS						
Name/type of processing	Scope of data subject to processing	Purpose of processing	Legal basis of processing	Term of processing	Recipients of data / Categories of recipients	Other notes
	<p>These are as follows:</p> <ul style="list-style-type: none"> • For transfer orders: requesting party's name, account number, recipient name, account number, secondary account identifier, personal data in the transfer note field. • - For collection orders: name of payer, account number, personal data in the communication field. • For payment request, requesting party's name, account No., recipient's name, account No., secondary account ID, personal data provided in the transfer note field, 				<p>You can find them here.</p> <p>GIRO uses no data processor in the course of processing</p>	<p>Taking into consideration that the GIRO may also process personal data contained in the transfer note field of each transaction, the content of which it has no control over, it may also process special categories of personal data.</p>

PRIVACY POLICY

Processing arising regarding the ICS						
Name/type of processing	Scope of data subject to processing	Purpose of processing	Legal basis of processing	Term of processing	Recipients of data / Categories of recipients	Other notes
	<ul style="list-style-type: none"> In case of GIROFix batched payment request: Requesting party's name, account No., recipient's name, account No., secondary account ID, personal data provided in the transfer note field 	For the purpose to provide the GIROFix service and perform the contractual obligations set out in the payment request	GIRO Zrt.'s legitimate interest (GDPR (47) Recital paragraph)	The data shall be archived (stored) as part of the payment requests for the period specified in the ICS Terms and Conditions and will be irretrievably deleted after the expiry of the archiving period. Controller shall retain and process the data for the period specified in the Accounting Act in force from time to time, in accordance with the Business Policy.	<p>Recipients are the joint controllers (contracted clients, bank and non-bank participants).</p> <p>GIRO uses no data processor in the course of processing.</p>	Taking into consideration that the GIRO may also process personal data contained in the transfer note field of each transaction, the content of which it has no control over, it may also process special categories of personal data.
Retrieving ICS transactions	<ul style="list-style-type: none"> In case of transfer order: requesting party's name, account No, 	Purpose of processing, is to enable GIRO to retrieve each transaction within five years of the execution on each client's	A GIRO Zrt.'s legitimate interest	From the date of execution of the subject transaction, for the forfeiture deadline as per the civil law (5 years).	GIRO transfers the personal data extracted from the retrieved transactions to each clearing member involved in a specific transaction as a joint controller with	

PRIVACY POLICY

Processing arising regarding the ICS						
Name/type of processing	Scope of data subject to processing	Purpose of processing	Legal basis of processing	Term of processing	Recipients of data / Categories of recipients	Other notes
	<p>recipient's name, account No., secondary account ID, personal data provided in the transfer note field.</p> <ul style="list-style-type: none"> In case of collection order: payer's name, account No., personal data provided in the transfer note field. In case of payment request: requesting party's name, account No., recipient's name, account No., secondary account ID, personal data provided in the transfer note field. In case of GIROFix batched payment request: requesting party's name, account No. 	<p>on each client's request.</p> <p>GIRO provides the retrieval service to Clearing Members for a separate fee.</p>			<p>GIRO</p> <p>Detailed information on the ICS participants are included in the Validation Table, which are available here.</p> <p>GIRO uses no data processor in the course of processing.</p> <p>—</p>	<p>In this case, Controller processes the personal data generated during the transfer/collection orders in order to provide the retrieval service to each clearing member's client. Although the GIRO is the joint controller with each clearing member for the operation of the ICS system, for the retrieval service, as it is provided as a separate purpose and means, it also processes individual personal data as a joint controller with the clearing member.</p> <p>The source of data is third party – GIRO's contractual parties, each clearing member.</p>

PRIVACY POLICY

Processing arising regarding the ICS						
Name/type of processing	Scope of data subject to processing	Purpose of processing	Legal basis of processing	Term of processing	Recipients of data / Categories of recipients	Other notes
	recipient's name, account No., secondary account ID, personal data provided in the transfer note field.	<p>Purpose of processing, is to enable GIRO to retrieve each transaction within five years of the execution on each client's on each client's request.</p> <p>GIRO provides the retrieval service to Clearing Members for a separate fee.</p>				Taking into consideration that the GIRO may also process personal data contained in the transfer note field of each transaction, the content of which it has no control over, it may also process special categories of personal data.
Interbank Expert Committee ('IEC')	GIRO processes the personal data of the persons delegated into the IEC (general contact details: name, phone No., address, e-mail).	Purpose of processing: effective operation of the IEC as the ICS's decision-preparatory body.	GIRO Zrt.'s legitimate interest	<p>By the expiry of the civil forfeiture deadline (5 years) from the date of termination of the clearing contract or from the date of becoming aware of the termination of the relationship.</p> <p>For another 2 months in backup.</p>	<p>The personal data of IEC Members shall not be transferred to third parties</p> <p>GIRO uses no data processor in the course of processing.</p>	The IEC is the is a body consisting of representatives of the clearing members, the NBHand the GIRO, which is a professional decision-making, preparatory and consultative forum, whose task is to take a position on operational and development issues related to the ICS.

PRIVACY POLICY

Processing arising regarding the ICS						
Name/type of processing	Scope of data subject to processing	Purpose of processing	Legal basis of processing	Term of processing	Recipients of data / Categories of recipients	Other notes
						<p>The source of the data is third parties: the GIRO's contractual partners, the individual clearing members.</p> <p>Contact details may appear in the course of the "Using GIROOnline" data processing.</p>
ICS education	<p>Personal data of the persons attending the training: name, place of birth, date, type of identity card and card number, signature.</p> <p>Name, position, contact details (telephone number, fax number, company address, e-mail address) of the person appointed by the company to act as a contact person).</p>	Successful and efficient delivery of ICS training to assist clearing members use the GIRO ICS service.	Contracting Parties' legitimate interest	<p>For 15 years or by the fulfilment of data subjects' request on erasure.</p> <p>For another 2 months in backup.</p>	<p>No personal data will be transferred to third parties regarding ICS education.</p> <p>GIRO uses no data processor in the course of processing.</p>	<p>In case of withdrawal of consent to data processing, GIRO will not be able to verify the attendance at the course even not upon request.</p> <p>Contact and participant details may appear in the course of the "Using GIROOnline" data processing.</p>

PRIVACY POLICY

Processing arising regarding the ICS						
Name/type of processing	Scope of data subject to processing	Purpose of processing	Legal basis of processing	Term of processing	Recipients of data / Categories of recipients	Other notes
Processing and disclosure of group collectors' personal data	Name(s)/designation(s), abbreviated name(s), group debt collector identifier(s) of the sole entrepreneur.	Disclosure at GIRO's two websites (www.giro.hu , www.csoportos-beszedes.hu) making it easier for data subjects to check the eligibility of debt collectors.	Data subjects' consent.	Until consent is withdrawn or until publication following removal from the register of group debt collectors. For another 5 years in backup.		Beyond data storage, GIRO discloses on its website.
Secondary account ID service	Recipient's name, account number, e-mail address, mobile phone No., tax ID No.	Execution of each clearing transaction to facilitate the compliance of clearing members with their legal obligations.	Meeting the legal obligations of the GIRO and each clearing member	Until the admission of clearing member's request for erasure. For another 5 years in backup.	Personal data extracted in the course of secondary account identifier operations will be transferred by GIRO to each clearing member involved in a specific transaction as a joint controller with GIRO.	

4.2 **GIRinfo**

GIRinfo is a GIRO service designed to provide its clients with the possibility to retrieve data from specific databases. Within this framework, clients request data from the GIRO database, on the basis of which the system automatically queries public registers and public databases for the data requested by the client.

The key information on data processing related to the service are set out in the table below:

Processing arising regarding GIRinfo						
Name/type of processing	Scope of data subject to processing	Purpose of processing	Legal basis of processing	Term of processing	Recipients of data / Categories of recipients	Other notes
GIRinfo contracts for services	<p>For non-disclosure declarations, details of the representatives of the prospective partners: name, personal identification details (name, date and place of birth, mother's name, address); signature.</p> <p>And further:</p> <ul style="list-style-type: none"> • Authorised persons acting on behalf of GIRinfo clients, and • Personal details of the contact persons provided as an annex to the contract: name, contact details (e-mail address, work address, telephone number, fax number). For those authorised to sign on behalf of the company, a specimen signature. 	<p>The conclusion of GIRinfo service contracts with individual clients, the maintenance of the contractual relationship and the exchange of information between the parties.</p> <p>Fulfilment of the GIRinfo assignment and contract for services.</p>	<p>In regards the executive officers acting on behalf of each client, and regarding the signature specimen, the legitimate interest of GIRO (and the client using the service)</p>	<p>In regards the contact details, by 31st December of the 5th year following the termination of the contractual relationship with the client or the date on which the client becomes aware that the contact has ceased to be a contact person.</p> <p>For another 2 months in backup.</p>	<p>In the course of the registration process, the data of the authorized signatories and their signatures specimen will be forwarded to the Deputy State Secretary for the Management of Registers of the Ministry of the Interior.</p> <p>GIRO uses no data processor in the course of processing.</p>	<p>The source of the data is third parties: contractual partners of GIRO, individual GIRinfo clients.</p> <p>Contact details can be displayed in the "Using GIROOnline" processing of personal data.</p>

PRIVACY POLICY

Processing arising regarding GIRinfo						
Name/type of processing	Scope of data subject to processing	Purpose of processing	Legal basis of processing	Term of processing	Recipients of data / Categories of recipients	Other notes
GIRinfo education	<p>Personal data of persons attending the training: name, type and number of ID document, signature.</p> <p>Name, position, contact details (telephone number, fax number, company address, e-mail address) of the person designated by the company to act as a contact person).</p>	GIRO Zrt. may identify the participants in the education.	GIRO Zrt.'s legitimate interest.	By 31 st December of the 5 th year from the education.	<p>The personal data are not transferred to a third party recipient.</p> <p>GIRO uses no data processor in the course of processing.</p>	Contact person and participant data may be displayed in the "Using GIROonline" data management.

4.3 **GIROBankSwitch**

The GIROBank Switching service provides payment service providers (banks, savings cooperatives) with efficient support for one-stage payment account switching. The underlying system is available over a closed, highly secure channel and significantly reduces the operational tasks associated with bank switching for payment service providers. However, the provision of the service will involve certain data processing operations on the GIRO side.

The key information on data processing related to the service are set out in the table below:

Processing arising in regards GIROBankSwitch						
Name/type of processing	Scope of data subject to processing	Purpose of processing	Legal basis of processing	Term of processing	Recipients of data / Categories of recipients	Other notes
GIROBank-Switch contracts for services	<p>The personal data of the authorized persons acting on behalf of GIROBankSwitch clients, the contact persons provided as annexes to the contract and the personal data of the public contact person provided in the Registration Datasheet name, contact details (e-mail address, work address, telephone number, fax number, telephone number, telephone number, fax number, etc.)).</p> <p>For authorized signatories, a specimen signature as well.</p>	<p>The conclusion of the GIROBankSwitch contract for services with each client, the maintenance of the contractual relationship and the exchange of information between the parties and the payment service providers.</p>	<p>The legitimate interests of GIRO in regards the authorized signatories and other contact persons representing each client, as well regarding the specimen signatures.</p>	<p>In regards contact details, by 31st December of the 5th year following the termination of the contractual relationship with the client or the date when the client becomes aware of the termination of the contact person position.</p> <p>For another 2 months in backup.</p>	<p>Public contact details of GIROBankSwitch clients are available to other users on the interface. In this regard, certain contact details are transferred to third party GIROBankSwitch users.</p> <p>GIRO uses no data processor in the course of processing.</p>	<p>The source of the data is third parties: GIRO's contractual partners, individual GIROBankSwitch clients.</p> <p>Contact person data may appear in the course of "use of GIROOnline" processing of personal data.</p>

4.4 **GIRODirect**

GIRO provides complex IT, operations and back office services to its contracted clients via GIRODirect. Through the IT system provided by GIRO, the Client can send payment messages directly to GIRO (group transfers, direct debits) and to the Account Manager (individual HUF and foreign currency transfers), and can also carry out other financial messages and message exchanges with the Account Manager in a controlled manner.

In this regards, personal data processing operations conducted by the GIRO as controller may occur at several sub-areas of the process, and it is therefore appropriate to inform data subjects on such processing operations.

The key information on data processing related to the service are set out in the table below:

Processing arising in regards GIRODirect						
Name/type of processing	Scope of data subject to processing	Purpose of processing	Legal basis of processing	Term of processing	Recipients of data / Categories of recipients	Other notes
GIRODirect contracts for services	The personal data of the authorised signatories acting on behalf of GIRODirect clients and of the contact persons provided as annexes to the contract: name, contact details (e-mail address, work address, telephone number, fax number), signature. For authorized signatories, signature specimen	The conclusion of GIRODirect service contracts with individual clients, the maintenance of the contractual relationship and the exchange of information between the parties.	The legitimate interests of GIRO in relation to the authorized signatories and other contact persons representing each client, as well as in relation to the signature specimens.	For the contact details, by 31 st December of the 5 th year following the termination of the contractual relationship with the client or the date on which the client becomes aware of the termination of the contact person's position. For another 2 months in backup.	Personal data will not be transferred to third parties in connection with GIRODirect service contracts. In the course of processing of personal data, GIRO uses the following data processors: HW Stúdió Kft.	Source of third party data: GIRO's contractual partners, individual GIRODirect clients. Contact details may be displayed in the "Uses of GIROOnline" processing.

PRIVACY POLICY

Processing arising in regards GIRODirect						
Name/type of processing	Scope of data subject to processing	Purpose of processing	Legal basis of processing	Term of processing	Recipients of data / Categories of recipients	Other notes
Transaction data submitted by the clients into the Electra system	Beneficiary's name, account number, title of transfer, any personal data potentially included in the communication. In case of postal payments: address.	Delivery of assignments to the beneficiaries	GIRO's legitimate interest.	For 5 years from the execution of the transaction.	The data are transmitted to each institute involved in a specific transaction as a participant in the ICS. Detailed information on the ICS participants are available in the Validation Table, which You can find here . In the course of processing of personal data, GIRO uses the following data processors: HW Stúdió Kft., Cardinal Kft.	Source of data from third parties: GIRO's contracted partners. GIRO is deemed a joint controller with each client. Taking into consideration that the GIRO may also process personal data contained in the transfer note of each transaction, the content of which it has no control over, it may also process special categories of personal data.
Retrieval of GIRODirect transactions	Transaction details: beneficiary's name, account number, title of transfer, recipient's name, account number,	Purpose of processing to enable GIRO to retrieve individual transactions for each client within 5 years of execution.	GIRO's legitimate interest.	For 5 years from the execution of the particular transaction, in accordance with Sec. 166/A of the Hpt.		In such case, the Controller processes the personal data generated by the transfer orders in order to provide the retrieval service to

PRIVACY POLICY

Processing arising in regards GIRODirect						
Name/type of processing	Scope of data subject to processing	Purpose of processing	Legal basis of processing	Term of processing	Recipients of data / Categories of recipients	Other notes
	any personal data provided in the transfer note.	The retrieval service is provided by GIRO to clients for an additional fee.			<p>The personal data extracted from the retrieved transactions will be transferred by GIRO to each GIRODirect client or clearing member involved in a specific transaction as joint controllers with GIRO.</p> <p>GIRO uses no data processor in the course of processing.</p>	<p>each client.</p> <p>Source of data from third parties: GIRO's contracted partners, each clearing member.</p> <p>Taking into consideration that the GIRO may also process personal data contained in the transfer note of each transaction, the content of which it has no control over, it may also process special categories of personal data,</p>

4.5 **GIROHáló**

GIROHáló is a communication network service provided by GIRO to support the business services provided by GIRO and its authorised partners and to communicate between participants. Within this framework, it provides data transfer (e.g. via the GIROFile data transfer method) and messaging (GIROMail) between some of its clients. However, the process also involves the processing of personal data.

The key information on data processing related to the service are set out in the table below:

Processing arising in regards GIROHáló						
Name/type of processing	Scope of data subject to processing	Purpose of processing	Legal basis of processing	Term of processing	Recipients of data / Categories of recipients	Other notes
GIROHáló contracts for service	<p>When ordering the GIROHáló and related services, as well as concluding a contract, GIRO shall manage the personal data of:</p> <ul style="list-style-type: none"> the signatory persons of client placing the order; the contact persons; <p>which are as follows:</p> <p>Name, contact details (e-mail address, work address, phone number, fax number), position.</p> <p>In case of signatories, signature specimen as well.</p>	<p>Purpose of processing, to enable GIRO to provide the GIRONet service in the most efficient way available to individual customers and to ensure that the service is used by customers and specific users to the best possible quality.</p> <p>In addition, GIRO also processes personal data to ensure the use of certain GIROHáló services.</p>	<p>GIRO's legitimate interests related to the authorized signatories and other contact persons representing each client, as well as regarding the signatures specimens.</p>	<p>In regards the details of the contact persons, by 31st December of the 5th year following the termination of the contractual relationship with the client or the date on which the customer becomes aware of the termination of the contact person position.</p> <p>For another 2 months in backup.</p>	<p>Personal data will not be transferred to third parties regarding GIROHáló service contracts.</p> <p>GIRO uses no data processor in the course of processing.</p>	<p>The source of the data is third parties: the GIRO's contractual partners, individual GIRO clients.</p> <p>Contact details may be displayed in the "Use of GIROOnline" processing.</p>

Processing arising in regards GIROHáló						
Name/type of processing	Scope of personal data Subject to processing	Purpose of processing	Legal basis of processing	Term of processing	Recipients of data / Categories of recipients	Other notes
	Certain personal data of users of the GIROMail service, designated by clients, which are as follows: name, contact details (e-mail address, work address, phone number, telefax number), signature GIROMail users		GIRO's legitimate interest.	In the system, after deleting the last message related to the user. For another 2 months in backup.	GIROMail users have access to each other's names and workplace names in the system. GIRO uses no data processor in the course of processing.	The source of the data is third parties: the GIRO's contractual partners, individual GIRO clients. Any user-related message in the system in which the user is listed as the sender or recipient, or in a copy. Taking into consideration that GIRO may also process personal data included in individual GIROMail messages over which it has no control, it may also process special categories of personal data.

PRIVACY POLICY

Processing arising in regards GIROHáló						
Name/type of processing	Scope of data subject to processing	Purpose of processing	Legal basis of processing	Term of processing	Recipients of data / Categories of recipients	Other notes
						User details may be displayed in the "Use of GIROnline" processing.

4.6 **GIROLock**

GIROLock is an authentication service provided by GIRO to its clients and their users on its own closed network (e.g. ICS, GIRinfo, GIROMail) and to customers and their users contracted to use services provided by its partners..

Within the framework of providing the service, GIRO issues certificates to users, the private key pair of which is included in the public keys, which can be used to create an electronic signature using a GIROLock card, to identify the user and to verify the signatures of the certificate itself.

In the course of providing GIROLock services to each of our clients and users, processing operations may occur.

The key information on data processing in relation to the service are provided in the table below:

Processing arising in regards GIROLock						
Name/type of processing	Scope of data subject to processing	Purpose of processing	Legal basis of processing	Term of processing	Recipients of data / Categories of recipients	Other notes
GIROLock contracts for services	<ul style="list-style-type: none"> In case of ordering GIROLock and related services, and upon the conclusion of the contract, GIRO shall manage the personal data of: the signatory persons of client placing the order; the contact persons; <p>which are as follows:</p> <p>Name, contact details (e-mail address, work address, phone number, fax number), position.</p>	The conclusion of the GIROLock service contract with each client, the maintenance of the contractual relationship and the exchange of information between the parties.	GIRO's legitimate interest regarding the authorized signatories and other contact persons representing each client.	<p>In regards the details of the contact persons, by 31st December of the 5th year following the termination of the contractual relationship with the client or the date on which the customer becomes aware of the termination of the contact person position.</p> <p>For another 2 months in backup.</p>	<p>Personal data shall not be transferred to third parties related to GIROLock service contracts.</p> <p>GIRO uses no data processor in the course of processing.</p>	<p>The source of the data is third parties: GIRO's contractual partners, individual GIROLock clients.</p> <p>Contact details may be displayed in the "Using GIROOnline" processing.</p>

PRIVACY POLICY

Processing arising in regards GIROLock						
Name/type of processing	Scope of data subject to processing	Purpose of processing	Legal basis of processing	Term of processing	Recipients of data / Categories of recipients	Other notes
	In case of signatories, signature specimen as well.					
GIROLock users	<p>When requesting a user certificate and during the existence of user's privileges:</p> <ul style="list-style-type: none"> - Customer, contact person (Name, contact details: phone number, e-mail address); - User's personal data (name, place of birth, date of birth, mother's name, type and number of identity document, signature, e-mail address). 	Efficient and effective provision of the GIROLock service to individual clients and users.	Consent of the data subjects, GIRO's legitimate interest.	<p>Data provided upon applying for a certificate: 5 years following the expiry of the last valid certificate.</p> <p>Personal data provided in the certificate (name, name of institute): by the termination of the GIROLock service.</p>	In the course of processing, GIRO transmits the name of the user and the institute for the purpose of card personalisation and PIN envelope printing to IDEMIA Kft. data processor.	<p>With the GIROLock service, GIRO provides a service to each of its clients, which ensures that the user of the certificate is identifiable in all cases.</p> <p>The source of data in certain cases is the Hungarian State Treasury.</p>

PRIVACY POLICY

Processing arising in regards GIROlock						
Name/type of processing	Scope of data subject to processing	Purpose of processing	Legal basis of processing	Term of processing	Recipients of data / Categories of recipients	Other notes
	<p>Upon applying for object authentication certificate:</p> <ul style="list-style-type: none"> • Certificate Management Administrator (name, e-mail address, phone number) personal data. <p>Authorization to receive a certificate on behalf of the client:</p> <ul style="list-style-type: none"> • - Authorizing representative (name, title), and; • - Personal data of the authorized representative (name, title, identity card number and signature of both). <p>Return receipt for the object authentication certificate:</p> <ul style="list-style-type: none"> • Personal details of the recipient (name, ID card number/passport number, signature). 					User, contact details may be displayed in the "Using GIROnline" processing.

4.7 **GIROnline**

GIROnline is designed to facilitate electronic communication between the client and GIRO regarding the services provided by GIRO and its partners. With GIROnline, GIRO provides an online interface for accessing protected documents, submitting electronic forms, filling in electronic questionnaires, managing and administering the data and rights of its own users who are administrators of the service. Within this framework, personal data are also processed.

The key information on processing regarding the service are provided in the table below:

Processing arising in regards GIROnline						
Name/type of processing	Scope of data subject to processing	Purpose of processing	Legal basis of processing	Term of processing	Recipients of data / Categories of recipients	Other notes
GIROnline contracts for services	<p>In case of ordering GIROnline and related services and concluding a contract, GIRO processes the personal data of the client's authorized signatory:</p> <p>Name, contact details (e-mail address, work address, phone number, telefax number), position, type and number of identity document, signature.</p> <p>In case of signatories, signature specimen as well.</p>	<p>The conclusion of the GIROnline service contract with each customer, the maintenance of the contractual relationship and the exchange of information between the parties.</p>	<p>GIRO's legitimate interests regarding the authorized signatories and other contact persons representing each client, as well as regarding the signature specimens.</p>	<p>In regards details of contact persons, by 31st December of the 5th year following the end of the contractual relationship with the client.</p> <p>For another 2 months in backup.</p>	<p>Personal data shall not be transferred to third parties regarding GIROnline service contracts.</p> <p>In the course of processing, GIRO uses the following data processors: HW Stúdió Kft.</p>	<p>The source of the data are third parties: contractual partners of GIRO, individual GIROnline clients.</p>

PRIVACY POLICY

Processing arising in regards GIRONline						
Name/type of processing	Scope of data subject to processing	Purpose of processing	Legal basis of processing	Term of processing	Recipients of data / Categories of recipients	Other notes
Use of GIRONline	<p>The personal data processed in the form bases of other GIRO services are included in the personal data processing survey for each service.</p> <p>In addition, the questionnaires are available on each interface.</p>	<p>Online completion and reception of documents related to client service management regarding other GIRO services, including the electronic reception and recording of data on contacts, users and their corresponding rights.</p>	<p>GIRO's legitimate interest, data subject's consent.</p>	<p>For 5 (five) years from the withdrawal of consent or termination of the contract.</p>	<p>No personal data shall be transferred to third parties regarding the use of GIRONline.</p> <p>In the course of processing, GIRO uses the following data processors: HW Stúdió Kft.</p>	<p>The source of the data may not be the data subject, but a third party, GIRO's contractual partners, individual GIRONline clients.</p>
GIRONline users	<p>In the course of applying for privilege:</p> <p>Contact person (name, phone number, e-mail address and telefax number)</p> <p>Users' personal data (name, maiden name, mother's name, e-mail address, place of birth, date of birth, ID number, phone number).</p>	<p>Efficient and effective delivery of the GIRONline service to individual clients and users.</p>	<p>GIRO's legitimate interest</p>	<p>For 5 (five) years from the withdrawal of consent or termination of the contract.</p>	<p>The personal data of each GIRONline user is visible to users of your institute with administrator rights on the service interface, so that data are transferred to such persons.</p>	

PRIVACY POLICY

Processing arising in regards GIROnline						
Name/type of processing	Scope of data subject to processing	Purpose of processing	Legal basis of processing	Term of processing	Recipients of data / Categories of recipients	Other notes
					In the course of processing, GIRO uses the following data processors: HW Stúdió Kft.	

5. EXTRACTS OF INTEREST BALANCING TESTS

In the course of its processing of personal data of the natural persons concerned in regards the provision of certain services described above, GIRO processes the personal data of the natural persons concerned on the basis of their legitimate interests. In order to provide data subjects of each of the above processing operations with the fullest possible information on the processing of their data, it will make available to them an extract of the interest balancing test it has carried out in accordance with the GDPR as follows:

For all of its services, GIRO has carefully assessed whether its legitimate interest in carrying out the processing detailed above outweighs the interests of natural persons and their fundamental rights and freedoms do not prevail, taking into account their reasonable expectations based on their relationship with GIRO.

On this basis, the GIRO concludes that, since the above processing does not disproportionately restrict the rights and freedoms of data subjects, its legitimate interests constitute an adequate legal basis for the processing.

6. EXTRACT OF AGREEMENT BETWEEN JOINT COLLECTORS

Taking into consideration that GIRO performs some of the processing activities detailed above as joint controllers with other controllers for specific services, pursuant to Article 26 of the GDPR, the joint controllers have, due to their legal obligation, set out the main terms of the joint processing in a separate agreement.

The GIRO shall make the agreement available on the request of any data subject, to which the Data Protection Officer of the Controllers shall provide access upon written request of the data subject.

We notify further that, irrespective of the terms of the above-mentioned agreement, You may exercise your rights under the GDPR related to and against each of the controllers, as detailed below.

7. DATA SUBJECTS' RIGHTS

In regards the processing of personal data as set out in this Privacy Policy, GIRO grants the following rights to the Third Parties concerned:

- Right to access;
- Right to notification;
- Right to rectification;
- Right to erasure;
- Right to restriction (of processing);
- Right to portability;
- Right to objection.

Each right of data subjects are detailed below:

7.1 Right to access and notification

On data subject's request, Controller shall notify the data subject on that the processing of his or her data is in progress.

If yes, Controller shall, in addition to providing access, notify the data subject of the categories of data processed, the purposes of the processing, the recipients or categories of recipients of the processing, the duration of the storage of the data or the criteria for determining the duration, the exercise of the rights of the data subject, the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information (NAIH), the source of the data and the fact of automated decision-making, including profiling. In the event of a transfer of data outside the European Union or the European

Economic Area, the data subject will also be informed of the appropriate safeguards for the transfer.

7.2 Right to rectification

Data subject is entitled to request the rectification of his/her personal data at Controller in the event of the inaccuracy thereof.

Should the rectification of personal data processed by the Controller be necessary, the data subject may request the rectification of the data in writing (by post or e-mail), indicating the correct data.

The data subject shall notify the Controller in writing (by post or e-mail) on any change in any personal data processed by the Controller without undue delay, but latest within 5 days following such change. The data subject shall be liable for any damage caused by failure to give such notification or by delay in giving such notification.

7.3 Right to erasure

The data subject shall have the right to obtain from the controller the erasure of personal data relating to him or her without undue delay at his or her request, and the controller shall be obliged to erase personal data relating to him or her without undue delay in the cases specified in the GDPR (Article 17)¹.

In the event that the Controller has disclosed the personal data, i.e. transmitted them to third parties, the Controller shall, in the event of the exercise of the data subject's right to erasure, take reasonable measures to notify the other controllers to whom the personal data have been transmitted that the data subject has requested the erasure of the links to or copies or counterparts of the personal data in question.

7.4 Right to restriction

Data subject shall have the right to that Controller may restrict the processing upon request, provided that:

- Data subject contests the accuracy of the personal data;
- the processing is illegitimate;
- the controllers no longer need the personal data for the purposes of the processing, but the data subject requires them for the establishment, exercise or defence of legal claims;
- the data subject has objected to the processing.

7.5 Right to rectification

The data subject shall have the right to receive personal data relating to him or her which he or she has provided to the Controller in a structured, commonly used, machine-readable format and the right to transmit such data to another controller without hindrance from the Controller, provided that:

- The processing is based on consent; and

¹ Cases as per Art. 17 (1):

- a) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- b) the data subject revokes the consent on the basis of which the processing is based in accordance with Article 6(1)(a) or Article 9(2)(a) and there is no other legal basis for the processing;
- c) the data subject objects to the processing on the basis of Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing on the basis of Article 21(2);
- d) the personal data were illegitimately processed;
- e) the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the controller is subject;
- f) the personal data have been collected in connection with the provision of information society services referred to in Article 8(1).

- the processing is performed in an automated manner.

7.6 Right to objection

The data subject may object to the processing of his or her personal data, including profiling. In this case, the personal data may no longer be processed for these purposes, unless the Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to the processing of personal data concerning him or her for such purposes, including profiling, where it is related to direct marketing.

If the data subject objects to the processing of personal data for direct marketing purposes, the personal data may no longer be processed by the Controller..

In regards exercising the rights listed above, the data subject shall have the right to contact the Data Controller at the following address:

- 1054 Budapest, Vadász str 31.

and via the

- dpo@mail.giro.hu

e-mail address.

Please also note that if the processing is based on consent (telephone number, e-mail address), **You may revoke your consent at any time**, without prejudice to the lawfulness of the processing carried out on the basis of your consent prior to its withdrawal. You may withdraw your consent by sending a statement to the above postal address or e-mail address.

Controller shall, without undue delay, but no later than 1 month from the date of the request, provide information in writing in an intelligible form on the measures taken in response to the request.

8. PROFILING

Within the framework of the provision of its services, GIRO Zrt. performs no profiling.

9. RIGHT TO TURN TO THE DATA PROTECTION SUPERVISORY AUTHORITY, COURT

Data subjects may file remedy, complaint related to the processing of personal data at the NAIH, whose contact details are as follows:

- Postal address: **1363 Budapest, PO. 9.**
- address: **1055 Budapest, Falk Miksa str. 9-11.**
- phone No.: +36 (1) 391-1400
- fax: +36 (1) 391-1410
- e-mail address: ugyfelszolgalat@naih.hu
- website: <http://naih.hu>

We notify further that, in addition to and without prejudice to the above, You have the right to take legal action against the processing of your personal data infringing the GDPR. In addition, if you have suffered pecuniary or non-pecuniary damage as a result of a breach of the GDPR by GIRO, You may also claim your damages from GIRO.