

DATA PROTECTION STATEMENT OF AEGON HOME SAVINGS FUND

To ensure secure processing and protection of your personal data is of primary importance to us. To this end we always ensure that we process your data only to such an extent which is required for the execution of any given process or measure, and we will take every technical and organizational measure to prevent unauthorized persons from accessing your data.

This data protection guide will give you all the necessary information on what happens to your data after you provide them to AEGON Home Savings Fund.

I. DATA PROCESSOR'S DATA

Your data are processed by Aegon Magyarország Lakástakarékpénztár Zrt., who is the Data Processor in respect of this guide.

- Seat: 1091 Budapest, Üllői út 1.
- Postal address: 1399 Budapest, Pf.: 33.
- Telephone: +36-1-477-4884
- E-mail address: lakastakarek@aegon.hu
- Website: www.aegonlakastakarek.hu

II. DATA PROCESSING OFFICER

- Name: dr. Schwanner Orsolya
- Contact information: ltp.adatvedelem@aegon.hu

III. PURPOSE OF AND LEGAL GROUNDS FOR PROCESSING DATA

Data may be collected for a clearly determined, specific purpose (i.e. it is restricted to a purpose), and may only be processed in a manner which is compatible with such purpose.

In order to ensure lawful data processing, the law clearly determines the legal grounds, the existence of which makes data processing possible:

- the stakeholder's consent,
- legal regulations to process a certain data class,
- data processing is required to fulfil a specific contract,
- it is the Home Savings Fund's legitimate interest.

DATA PROCESSING IN RELATION TO HOME SAVINGS CONTRACTS

Purpose of data processing: The purpose of data processing is that the Data Processor concludes home savings contracts for its Clients pursuant to the provisions set forth in Act CXIII of 1996 on Home Savings Funds (hereinafter: Home Savings Act) and provides related services.

Scope of data subjects: every Client, specifically

- those who set aside savings for their homes,
- those who enter the Contract after its conclusion as an authorized party instead of the person saving for his/her home (new authorized party in the event of assigning the contract to someone else, or beneficiary/heir in the event of the death of the contracting party)
- after accepting the money to be assigned, the Beneficiary who is able to act, from the date of informing the Home Savings Fund in writing that he/she wishes to exercise the right of disposal available to him/her pursuant to the Home Savings Act,
- the Debtor, Co-Debtor,
- the Obligor (Mortgager) of a Security Agreement if the legal relationship exists on the basis of such agreement.

Processing data pertaining to the clients of the Home Savings Fund

Data processing is a condition to establishing and maintaining the contract. The purpose of data processing is to fulfil tasks pertaining to the home savings contract, especially the establishment of the contract, keeping records, crediting payments, keeping the account, verifying entitlement to state subsidy, claiming and crediting state subsidy, settling of payments, verifying that savings are used for housing purposes, loan assessment, making the loan payable, paying off and collecting the loan.

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

Recording and management of certain data is required by the law to fight against money-laundering and the financing of terrorism, with the purpose of identifying account holders, taking the necessary client due diligence measures, establishing tax residence in order to mitigate the risk of tax evasion, and, in the event of a complaint, keeping complaints in a sufficient manner, fulfilling data provision obligations.

- 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

Data to be recorded are as follows:

- first name and surname of natural person,
- family name and first name given at birth,
- nationality,
- date and place of birth,
- mother's name given at birth,
- 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.

During the course of regular or advanced due diligence 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 Home Savings Fund by checking it in a valid database. In addition, the Home Savings Fund will copy the documents presented upon identification, record them in its files and keep them.

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

- **In the event of applying for state subsidy, legal provisions stipulate the scope of data to be supplied to the Hungarian State Treasury.**³
 - ID data, address and tax number of the natural person who is setting aside money for household purposes and that of the beneficiary;
 - commencement of the contract and the savings period, the account number and amount of the deposit paid, and the claimed state subsidy.
- If the person saving for household purposes 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 Home Savings 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 Home Savings Fund is obliged to supply statistical data which do not contain personal data to the Hungarian National Bank.

2. Data processing will occur based on the Home Savings Fund's **legitimate interest** if the Home Savings Fund has such justifiable interests which substantiate the use of data. They are as follows:

- **Acquisition purpose:** the Home Savings 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.
- **Product and business development, development of services:** the Home Savings 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 premium payment. 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 Home Savings Fund, savings with a household purpose and certain services of the company. The Company 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:** As a member of the Aegon Hungary Group the Home Savings 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.
- **Recovering and selling debts:** it is the legitimate interest of the Home Savings Fund to collect any claims against its clients and other related private persons, and to use any personal data required for the processes for such a purpose.
- **Instituting civil and penal proceedings in connection with home savings contracts:** as long as the contract exists and after its termination data will be stored as long as civil and criminal claims possibly arising in connection with the contract lapse: the Home Savings Fund is required to keep data until punishability lapses, because it may arise that a crime was committed when payment was made and data will be needed in a subsequent procedure as evidence.

3. 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.
- **participation in campaigns**
If you want to take part in campaigns and open a home savings plan with a discounted account opening fee because of your existing Aegon household insurance or voluntary pension fund membership, we will verify if you are entitled to such discount upon concluding the contract and subsequently during the term of the contract. To this end we will hand over your identification data as well as data to verify your entitlement to Aegon Magyarország Általános Biztosító Zrt. or Aegon Magyarország Nyugdíjpénztár, who will confirm whether the required insurance policy or pension fund membership exists. Data processing will last as long as the discount is valid, or as long as entitlement is verified. If the client indicates that he/she no longer requires the discount, data processing will be cancelled.

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

³ Government Decree 215/1996 (December 23) on the state subsidy of savings for housing purposes

■ 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.

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

Data processing in the event of beneficiaries/heirs

The person saving for household purposes may assign a beneficiary in the contract, and data specified by legal provisions are required to identify the beneficiary and to claim the state subsidy for the beneficiary's benefit.

Upon acceptance of the allocation a beneficiary who is able to act shall become the Client and provisions contained in the previous clause will become applicable.

In the event of the death of the person savings for household purposes, if the beneficiary or the heir enters the contract, provisions contained in the previous clause for Clients will become applicable.

If the beneficiary or the heir do not enter the contract, data are needed in order to effect payment to them, or if such payment exceeds the limit as specified by the law, we will request data to perform due diligence required for the purposes of prevention of money laundering.

As long as the contract exists and after its termination during the limitation period settlement issues, claims, cases of suspected fraud may necessitate the use of data for the purposes of inspection and settlement.

Close relative of the person saving for household purposes or the beneficiary

If the person saving for household purposes or the beneficiary uses the contract to the benefit of a close relative, using the funds for household purpose must be verified with regard to the close relative. Payment of the funds is subject to supplying the data required for such verification.

As long as the contract exists and after its termination during the limitation period settlement issues, claims, cases of suspected fraud may necessitate the use of data for the purposes of inspection and settlement.

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

If a representative is acting on behalf of the client, we will request data to identify the representative, and to verify his/her entitlement to represent the client.

We will use such data to fulfil the requested services and, if necessary, to perform due diligence required by the law.

As long as the contract exists and after its termination during the limitation period settlement issues, claims, cases of suspected fraud may necessitate the use of data for the purposes of inspection and settlement.

Data processing in the event of witnesses

In order to prove that the necessary statements were made, the internal regulations of the Home Savings Fund specify instances when a private deed with absolute probative value is required. This shall be met by two witnesses attesting with their signatures that the client signed the statement with his/her own hand in their presence, or admitted his/her signature as his/her own.

The form contains the name, address and signature of the witnesses, so their data will be processed.

Data processing rules pertaining to the central credit information system

The Home Savings Fund as a reference data provider provides data to the financial enterprise managing the central credit information system (hereinafter: CCIS) about the Debtor pursuant to the provisions of the Act on Credit Institutions and Financial Enterprises (hereinafter: Credit Institutions Act) as well as the provisions of the Act on CCIS. Before concluding the contract the Home Savings Fund will check any data kept on the files of CCIS on mortgagors.

CCIS can only manage reference data specified by the law.

The Home Savings Fund will hand over to the financial enterprise managing the CCIS the data of such natural person client:

- a) who the Fund concludes a contract with,
- b) who fails to comply with his/her payment obligation undertaken in the contract in a way that the amount of his/her overdue and unpaid debt exceeds the minimum amount of the monthly minimum wage valid at the time of the payment being in default and the default above the amount of the minimum wage continues to exist for more than 90 days (in the event of several legal relationships the fulfilment of conditions must be taken into consideration separately), or
- c) who discloses false data during the course of initiating the contract in a way which is susceptible of proof with a deed, or because of using forged or falsified documents the court, in its legally binding resolution, establishes that a crime set forth in § 342, 343, 345 and 346 of Act C of 2012 on the Criminal Code (hereinafter: Criminal Code) was committed,
- d) against whom the court, in its legally binding resolution, establishes that a crime set forth in paragraph (5) of 374 § and 393 § of the Criminal Code was committed because of using non-cash means of payment.

30 days before the planned date of data transfer in conformity with point (b) above the Home Savings Fund informs the natural person client in writing that his/her reference data will get into the CCIS if he/she fails to comply with the obligations set forth in the contract.

In compliance with the law the CCIS will store data for one year after fulfilment in the event of fulfilling an overdue debt, and for five years after termination of the debt out of non-fulfilment, and shall delete data thereafter permanently and in a non-restorable manner.

The Client may make a statement

- a) if, in relation to point (a) above, he/she agrees that his/her data be taken over by other reference data provider from the CCIS system for the purposes specified in the CCIS law. The fact that such approval was given is included in the CCIS. In cases set forth in legal provisions data can be handed over from CCIS irrespective of such consent;
- b) if he/she agrees that his/her data be included in the CCIS for a maximum of five years after the termination of the contract.

The consent specified in point (a) through the reference data provider, the consent specified in point (b) through the reference data provider during the term of the contract and, by means of a statement submitted directly to the financial enterprise managing

the CCIS after the termination of the contract may be withdrawn any time. In regard to subsequently withdrawing or granting the consent always the Client's latest written statement shall be binding for all his/her contracts subject to data supply.

Reference data by the CCIS may be handed over to financial institutions only to make the decision which is foundational to the conclusion of the following contracts:

- a) granting credit and loan,
- b) financial leasing,
- c) issuing paper-based non-cash means of payment, and providing related services which are not qualified as payment services,
- d) undertaking surety and bank guarantee, or any banker obligations,
- e) granting investment credit to an investor,
- f) securities lending.

Anyone is entitled to request information from any reference data provider regarding his/her data kept in the CCIS and which reference data provider handed over such data. The reference data provider must forward the request for information to the financial enterprise managing the CCIS immediately, but within two working days at the latest, who will send the requested data to the reference data provider in a closed manner within three days, who will, after receipt thereof, send it to the requesting party also in a closed manner, in the form of a document mailed with a delivery certificate immediately, but within two working days at the latest. Requesting information is free of charge for the person requesting it.

The financial enterprise managing the CCIS may only take over the reference data handed over by the reference data provider, and may only hand over the reference data it manages to the reference data provider.

In relation to natural persons the following ID data may be kept on the files:

- a) name,
- b) name at birth,
- c) date and place of birth,
- d) mother's maiden name,
- e) ID card (passport) number or number of any other certificates suitable to prove one's identity pursuant to Act LXVI of 1992 on keeping records on the personal data and address of citizens,
- f) home address,
- g) mailing address,
- h) electronic mailing address.

In consideration of the Home Savings Fund's restricted activities contractual data pertaining to granting a household loan shall be as follows:

- a) type and identifier (number) of the contract,
- b) date of concluding the contract, its maturity and termination,
- c) client capacity (debtor, guarantor),
- d) contractual amount and currency, method and frequency of paying instalments,
- e) amount and currency of the instalment of the contractual amount,
- f) the fact, date and amount of early repayment, and the amount of the outstanding principal sum and its currency,
- g) the amount of the outstanding principal sum and its currency.

Those who disclose false data during the course of initiating the credit agreement in a way which is susceptible of proof with a deed, or if the court, in its legally binding resolution, establishes that a crime set forth in § 342, 343, 345 and 346 of Act C of 2012 on the Criminal Code was committed because of using forged or falsified documents, in addition to the list above, the following data of the Client may be processed and handed over:

- a) date and reason of declining the application,
- b) documentary evidence,
- c) number of legally binding court resolution,
- d) name of court,
- e) content of the operative provisions of the court resolution.

Data processed in relation to declining the consent:

- a) date of the statement (place and date),
- b) the reference data provider's identifier data,
- c) Client's identifier data,
- d) note referring to the fact of declining the statement.

The Client may lodge a complaint against his/her reference data being handed over to and processed by the financial enterprise managing the CCIS, and may request that his/her reference data be amended or deleted. The Client may lodge his/her complaint pertaining to data handed over by the Home Savings Fund to the Home Savings Fund or the financial enterprise managing the CCIS. The organization receiving the complaint will examine the complaint within five working days of receipt thereof and inform the Client of the result of the examination in writing in the form of a document mailed with a delivery certificate immediately, but within two working days after the completion of the examination at the latest. The financial enterprise managing the CCIS is obliged to inform every reference data provider of the amendment or deletion, who requested data about the Client within one year preceding the request for amendment or deletion.

If it is justified that Client data should be amended or deleted, or such data were handed over and processed contrary to the law, the Client may take legal actions by filing a claim at the competent district court as per his/her domicile within 30 days.

Data of the financial enterprise managing the CCIS:

Bankközi Informatikai Szolgáltató (BISZ) Zrt.

- Address: 1205 Budapest, Mártonffy utca 25-27.
- Website: www.bisz.hu
- Telephone: (+36 1) 421-2505

Intermediaries

Intermediaries' data will be processed for the following reasons:

- to fulfil rights and obligations arising from the permanent agreement for intermediaries.
- to examine prior to concluding the agreement and during the term of the agreement whether the natural person meets the aptitude expectations required to perform the task, such as, among others, a clear criminal record, qualifications and professional experience.
- to meet the requirement of registration and data supply required by the regulator.
- to enforce live claims as well as civil and criminal claims against the natural person.
- to clear up, manage and prevent fraud.

Legal grounds for data processing:

- data processing required for fulfilling the agreement for intermediaries
- data processing stipulated by legal provisions
- data processing is required to enforce the legitimate interests of the data processor.

Recipients of personal data:

- service providers engaged in keeping the records of agreements, paying commissions, and the clawback of unjustified commission paid.
- authorities entitled to access data in compliance with legal provisions, e.g. the Hungarian National Bank, the National Tax and Customs Administration of Hungary, authorities investigating a case, the public prosecutor's office, and the court.
- Data processing will last as long as the agreement is in force and as long as claims may be enforced in relation to the contractual relationship after termination thereof. Pursuant to the law accounting documents will be kept for eight years.

Contracted partners

In terms of service partners who are in a contractual relationship with the Home Savings Fund we will process the data of representatives acting in the course of concluding the agreement as well as that of designated contact persons in connection with performing the terms of the agreement, settlements related to the agreement, and enforcing any civil or criminal claims.

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

SOUND RECORDING⁴

Your conversation with our call centre will be recorded to verify the measures taken, to retrace the content of the statement made, to identify the individual making the statement and the date of such statement, and to protect the rights of the persons taking part in the conversation. If someone refuses to give his/her consent to the recording, we will not provide the opportunity to arrange matters over the phone, however, the person will have the opportunity to contact us through our client service offices in person, online or in mail to arrange matters related to his/her home savings contract.

Calls conducted with our sales call centre operators will also be recorded. You may discontinue the call any time, if you feel it is unsuitable for you.

Sound recordings will be kept because of the legitimate interest of the Home Savings Fund as long as data pertaining to the contract are kept. It is in the interest of the Home Savings Fund to retrace the calls which prove to be evidence as well as the statements made during the calls as long as the contract exists and after its termination as long as civil or criminal claims in connection with the contract become void.

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

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

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

DATA PROCESSING ON THE WEBSITE

The website of the Home Savings Fund is operated by Aegon Magyarország Lakástakarékpénztár Zrt. The servers are provided by Aegon Magyarország Általános Biztosító Zrt. and are operated by Bohl Software Consulting Kft.

Calculators

If you use our dream home or home creation calculator, or request the services of a personal advisor for the conclusion of the contract, we will ask that you give your name, telephone number, e-mail address and zip code so that our Call Centre can contact you and help you to conclude the home savings contract. You may decide to give the data required for the conclusion of the home savings contract online by using our Home Savings Fund calculator (opting online contracting), however, your data will be transferred to the Call Centre of the Home Savings Fund in this case, too, and the Call Centre will contact you over the phone to conclude the contract. Conclusion of the contract is always subject to personal identification, a colleague will visit you to this end.

Supply of data is voluntary and can be withdrawn any time afterwards. Data will be stored for six months if the contract is not established, and will be deleted afterwards. If the home savings contract is established, data processing rules pertaining to Clients shall prevail.

The servers for the operation of the calculators are provided by Aegon Magyarország Általános Biztosító Zrt. and they are operated by Bohl Software Consulting Kft., while the calculators are being developed and run by Aegon Magyarország Általános Biztosító Zrt.

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

Online Client Service

Clients 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 Client's personal and contract-related data, his/her deposits and the consignments, and it is also possible to amend some data. Data shall be processed in relation to the performance of the 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.

What are cookies?

Cookies are small text files which the website places on the computer or mobile device of the user browsing it. Cookies help the website to remember your actions and personal setting for some time such as the username, the language, the font size and other customs settings related to the website's graphic display so it is not needed to specify them again every single time when visiting our website or navigate from one website to the other.

How are cookies used?

The website of Aegon Magyarország Lakástakarékpénztár Zrt. uses cookies to improve user experience. To simplify it, by means of collecting browsing information can we save your settings and user data, make them available during the course of individual working processes, improve our website and send you individual messages with advertisements.

Cookies will be used for the following purposes:

- collecting information required to improve the website and to shaping user needs,
- collecting information on user habits, analysing user habits,
- improving user experience,
- displaying targeted advertisements at subsequent browsing.
- cookies will also be used in a way that in the course of the user's next visit content related to user's former activities will be displayed to the user, settings may be loaded automatically to make the use of the website more comfortable

It is important that cookies will not be placed at the Operator, but on the user's own device which he/she uses for browsing online content, so the user will have total control over them. When browsing the website with the use of cookies placed on the user's computer the following may be recorded automatically: the starting and finishing time of the user's visit, the IP address, and in some cases, depending on the settings of the user's computer the type and language of the browser, the operation system, the parameters of the user's device, settings made by the user on the website, any subsites visited and time spent on them. The operator shall not and cannot connect these data with personal data, you may decide to share them with us by means of an express authorization and by setting the cookies in your browser.

What type of cookies do we use?

1. Our own cookies and cookies from a third party

We use our own cookies and cookies from third parties on our websites.

Our own cookies are from the aegon.hu domain, and are usually used to identify settings pertaining to language and location, and to display basic website functions.

Cookies from third parties belong to other parties, and are managed by other parties, such as Google or Hotjar's business partners. These cookies might be necessary for certain actions such as to enable advertisements from outside Aegon websites.

2. Cookies for a working process

Cookies for a working process are temporary cookies which remember your activities as long as you remain on the website and they expire when you close your browser. You may need them to complete forms.

3. Permanent cookies

Permanent cookies are for remembering your settings within the website, and they will remain on the computer or the mobile device when you close the browser or restart your computer. We will use these cookies to analyse user activity in order to establish visitor samples, to improve our website's functionality to you or other people visiting it. These cookies make it possible for us to display targeted advertisements to you and to assess the efficiency of our website's functions and advertisements.

How will we use cookies for advertising purposes?

Cookies and advertising technologies, such as data collection marks, pixels and anonymous, advertising network-related labels help us to display relevant advertisements to you more effectively.

They help us to collect aggregate audit data, to carry out research and to make reports to performance advertisers. With the help of pixels we will recognize and improve delivery of advertisements, and also find out when certain advertisements are displayed to you. Because web browsers may request advertisements and data collecting marks directly from the servers of the advertising network, these networks can view, edit or set their own cookies as if you requested a website from their main sites.

Although we do not use cookies on third party websites to create a profile related to the browsing activity, we use aggregate data from third parties in order to display relevant advertisements to you based on your interests. We will not hand over any personal data we collect to the advertising party.

By modifying the cookie settings you may unsubscribe from advertisements carried out by informing external and third parties. Unsubscribing will not remove the advertisements from the pages you visited: unsubscribing means that the advertisements displayed will not be aligned to your interests. This means that the advertisements you see will not be aligned to your interest by the cookies with a certain type.

How do we use external cookies (from third parties)?

We hire external suppliers for some of the functions available on our website, e.g. if you visit a page with an embedded video from YouTube or a link points at it. Such videos or links (and other content from external suppliers) may contain cookies of the third party, so it might be useful to study the policy of such third party websites regarding the use of cookies.

How can I decline and delete cookies?

If you want to modify your cookie settings related to the website, or delete them, you can do so in the settings of your browser because cookies are stored on the user's computer and not at the operator of the website. For more information to modify your previous cookie settings visit the help menu in your browser, and you may delete the cookies from the device you use for browsing, which were previously placed by the operator.

For more information on how individual browsers handle cookies visit the following websites:

- Google Chrome
- Firefox
- Microsoft Internet Explorer 11
- Microsoft Internet Explorer 10
- Microsoft Internet Explorer 9
- Microsoft Internet Explorer 8
- Microsoft Edge
- Safari

Maintenance of the cookies

It is possible that you maintain and/or delete cookies as you wish. For more information please visit aboutcookies.org. You can delete all the cookies stored on your computer, and can disable installation thereof in most browsers. If you decide to do so, please be aware that every time you visit a website, you will have to manually perform certain settings, and acknowledge that certain services and functions will not be accessible.

It is easy to accept or decline cookies used by our website, you need to select one of the following two links: I accept cookies / I do not accept cookies.

PROCESSING DATA FOR DIRECT MARKETING PURPOSES

- In order to increase the number of home savings plans the Home Savings Fund will collect the data of interested private individuals from external sources, contact these individuals over the phone or in electronic mail to conclude a contract. Data will be processed based on the individual's consent.
- Data required are as follows: name, telephone number, e-mail address, address, date of birth
- Data may come from online registration, telephone contact, personal contact, database taken over from another data processor, public database.
- Consent to data processing is valid for three years, and must be renewed every three years, otherwise it will lapse.
- The consent may be revoked any time within the validity period, in this case you will not get more advertisements from the company you specify in your withdrawal.

IV. SUBMITTING AND TRANSFERRING DATA TO AN EXTERNAL PARTY

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 Home Savings Fund is entitled to use a data processing company to perform technical activities pertaining to its data processing operations.

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

- the client gives his/her consent to it in an appropriate manner (during the process of concluding the contract, or in the absence thereof in the form of an authentic instrument or a private document having full documentary evidence)
- the law gives permission to it
- transfer of data is required to collect the outstanding and due debts of the client of the home savings fund or to sell such debt.

Recipients might be as follows:

- service providers engaged in outsourced activities: external service providers who perform activities related to the Home Savings Fund's activities, where the performance of such activities requires data management or data processing (e.g.: printing house, businesses engaged in the operation of IT systems). The list of partners performing outsourced activities is included in the Attachment to the Regulations.
- professionals, such as lawyers and auditors performing expert activities.
- authorities and courts listed in the act regulating the activities of credit institutions, within the scope of proceedings as specified by the law.
(e.g.: Hungarian National Bank, Tax Authority, authority acting as a financial information unit, Hungarian Competition Authority, National Deposit Insurance Fund, Financial Arbitration Board, authorities investigating a case in criminal proceedings, the public prosecutor's office, national security service, company wishing to obtain influence, public notary acting with regard to an estate, the public guardianship authority, a court acting in cases of bankruptcy or liquidation, in judicial enforcement proceedings, the Central Credit Information System in the event of applying for a housing loan)

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

The IT operations of the data processor are carried out by the EDC Company (Registry court number: SC367146 registered seat: Aegon Lochside Crescent, Edinburgh Park, Edinburgh EH12 9SE, UK) owned by the owner of the data processor (AEGON N.V. registered seat: Aegonplein 50, 2591 TV, The Hague, The Netherlands, registry court number: 27076669), within the scope of which your data shall go through computers which are located in countries of the AEGON global group of companies within the European Union. Your data shall not be processed in these countries, they will only be transferred technically.

VI. DATA RETENTION PERIOD

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

After the termination of the contract we will keep data due to the Home Savings Fund's just interest as long as civil or penal claims may be enforced with regard to the contract, because data may be needed to verify claims in possible future proceedings.

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

Pursuant to the Accountancy Act all accounting documents, including the contract itself, must be kept for eight years. Pursuant to the regulations controlling measures necessary for the purposes of the fight against anti-money laundering and the financing of terrorism, data recorded within the scope of such purposes data must be kept for eight years after the termination of the contract.

If data management is based on consent, it will be valid as long as you withdraw your consent. Consent to use personal data for marketing purposes must be renewed every three years, and in the absence of a renewed consent we will not send any further messages for promotional purposes.

If data becomes necessary for the purposes of activities serving the Home Savings Fund's just interests, data may be deleted after such just interests cease to exist.

VII. RIGHTS OF THE INDIVIDUAL

1. Access right: : It means that you may ask for feedback whether or not data processing is in progress and ask for more details, specifically about the following:

- what is the purpose of data processing
- categories of related personal data
- where did we transfer data to (if outside the EU, what are the guarantees)
- the term of keeping data
- if we did not ask data directly from the Client, what are the sources of such data
- what are the rights of the relevant client
- the fact of automated decision making or profiling, the logic used, and the consequences.

Upon request we will make a copy of your personal data available to you.

2. Correction: If you discover that the personal data on our files are not appropriate (incorrect, incomplete), you may request that they be corrected or completed.

3. Deletion (cancellation): Upon your request we will delete your personal data if:

- they are not needed any longer for the purpose which they were recorded for,
- you withdraw your consent and there is no other legal ground verifying data processing,
- the Home Savings Fund processes data out of its own just interests, you object to such data processing, and there is no legal reason having priority over it,
- data are processed against the law,
- the law specifies that they be deleted.
- in the event of using electronic services offered to children.

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

If we disclosed some data, but we need to delete them pursuant to the above, we will do our best – considering the technology available to us as well as the costs related to execution – in order to make the fact of deletion known to those who received your data, and inform them on the need to delete the links pointing at any personal data and copies thereof.

Deletion have further specific restrictions if data are required to enforce claims or for the purposes of public interest (national health, archiving due to scientific and historical research).

4. Restrictions to data processing: may occur in the following instances:

- if you challenge the accuracy of data, and we need time to check it,
- if data processing is against the law, but you specifically ask for restriction instead of deletion,
- data are no longer needed for the purpose of data processing, but you ask them to be kept in order to submit, enforce or protect legal claims,
- if data is processing pursuant to the Home Savings Fund's just interest, and you object to data processing, data processing will be restricted until we establish if the Home Savings Fund's just interest enjoys priority over your objections.

Restriction means that your data will only be stored, unless you ask for some other measures to be taken as well, or if data are needed to submit, enforce or protect legal claims, or if it is necessitated by the protection of another person's rights or by important public interest.

5. Right of objection

You may use this right if data processing is based on the Home Savings Fund's just interest. In such an instance the Home Savings Fund is to verify that such just interest is of primary importance and exceeds the client's interest to data protection.

An example is data processing for acquisition purposes. If the client objects to it, we will acknowledge it, and will not contact him/her with our product offers.

6. Portability of data

You may request that we hand over to you electronically the data you made available to us, or we transfer such data to a data manager/data processor specified by you, provided that the necessary technical and data security conditions are given. Your request may refer to data that we process pursuant to your consent, or for the purposes of the fulfilment of the contract, in an automated manner.

7. Right of filing a complaint to the authority

You may contact the National Authority for Data Protection and Freedom of Information against our data processing.

Authority's address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.

Authority's website: www.naih.hu

VIII. AUTOMATED DECISION-MAKING, PROFILING

When making decisions pertaining to data processing purposes as specified above we do not apply automated decision-making.

In the case of clients applying for a housing loan (debtor, co-debtor) and in the case of mortgagers we will carry out a credit assessment prior to contract conclusion, i.e. we will request and analyse data pertaining to income and assets for the purposes of profiling. The purpose is to assess whether the individual will be able to fulfil his/her obligations undertaken in the contract.

Credit assessment is set forth by the Act on Home Savings Funds.⁶ Factors to be taken into consideration in the course of credit assessment are specified in the Regulations of the Home Savings Fund.

In addition, credit assessment shall serve the purposes the legitimate interests of the Home Savings Fund. By evaluating data requested we want to mitigate the risks with regard to non-repayment of credits.

In the course of credit assessment we will request data from the Central Credit Information System managed by BISZ Zrt. (see the clause on rules pertaining to data processing with regard to the central credit information system).

The appraisal and assessment of the underlying property will be carried out by an external supplier, who will be employed by the client.

We will verify the data of clients applying for a housing loan and that of mortgagers in the records of citizens' personal data and address with the participation of Giro Zrt., as data processor.

IX. DATA PROCESSING FOR OTHER PURPOSES

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

⁶ Act CXIII of 1996 on Home Savings Funds