

## Data processing records

No.	Topic	Purpose of processing	Duration of personal data processing	Legal basis of data processing	Scope of processed personal data
1	Managing inquiries	Managing interactions with persons interested in the service	Until the withdrawal of consent, in the absence thereof: until the end of the general limitation period as specified in the Civil Code (5 years)	Consent	E-mail address, telephone number
2	Account management	Opening, managing and closing bank accounts for corporate customers, providing services related to bank accounts	8 years after the termination of the contract or claim (Accounting Act, Section 169 (2), AML Act, Section 56-57)	Performance of a contract	Identification data, contact information, any personal data provided during account transactions
3	Payment transactions	Receiving and executing international and national payment orders – including check collections – for corporate customers	8 years after the termination of the contract or claim (Accounting Act, Section 169 (2), AML Act, Section 56-57)	Performance of a contract	Identification data, contact information, any personal data provided during account transactions
4	Bank card service	Concluding bank card contracts for the provision of bank card services with persons appointed by the Bank's corporate customers, as a tied agent - and acting on its behalf - of MTB Magyar Takarékszövetkezeti Bank Zrt.	8 years after the termination of the contract or claim (Accounting Act, Section 169 (2), AML Act, Section 56-57)	Performance of a contract	Identification data, contact information, data related to the registration of credit card transactions.
5	Electronic Banking	Providing electronic banking services for corporate customers	8 years after the termination of the contract or claim (Accounting Act, Section 169 (2), AML Act, Section 56-57)	Performance of a contract	Identification data, contact information, data necessary for checking authorisation
6	Other cash management	Providing other cash management services for corporate customers	8 years after the termination of the contract or claim (Accounting Act, Section 169 (2), AML Act, Section 56-57)	Performance of a contract	Identification data, contact information, any personal data provided during certain orders
7	Deposit management	Managing corporate customer deposits (e.g.: fixed deposits, dual currency structured deposits)	8 years after the termination of the contract or claim (Accounting Act, Section 169 (2), AML Act, Section 56-57)	Performance of a contract	Identification data, contact information

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8	Custody management	Managing corporate customer securities and their other special purpose funds, such as temporary agency work/placement securities	8 years after the termination of the contract or claim (Accounting Act, Section 169 (2), AML Act, Section 56-57)	Performance of a contract	Identification data, contact information, personal data provided in security orders
9	Cash desk service	Managing cash withdrawals and deposits, summary delivery and acceptance of cash	8 years after the termination of the contract or claim (Accounting Act, Section 169 (2), AML Act, Section 56-57)	Performance of a contract	Identification data, contact information, any personal data provided during certain cash withdrawals and deposits. After reaching the value limit according to AML Act, data group required for identification according to AML Act
10	Safe deposit box service	Fulfilling the safe lease contracts of the Bank's corporate customers	8 years after the termination of the contract or claim (Accounting Act, Section 169 (2), AML Act, Section 56-57)	Performance of a contract	Identification data, contact information
11	Granting credit and financial loan	Providing short, medium and long-term, as well as open maturity loan products (including the management of collaterals inseparable from this)	8 years after the termination of the contract or claim following the ending of all credit relations (Accounting Act, Section 169 (2), AML Act, Section 56-57)	Performance of a contract	Identification data, contact information, any personal data provided during certain contracts/orders, data of natural persons providing collateral for collateral valuation and contracting
12	Commercial transactions	Providing bank guarantees, documentary transactions, structured export and trade financing	8 years after the termination of the contract or claim (Accounting Act, Section 169 (2), AML Act, Section 56-57)	Performance of a contract	Identification data, contact information, any personal data provided during certain orders
13	Collateral management	Providing collateral manager services for corporate customers of the Bank	8 years following the termination of the contractual relationship	Performance of a contract	Identification data, contact information, personal data contained in electronic subcontractor register

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14	Investment services	Risk questionnaire required by Directive MiFID II (compliance and suitability test)  Executing orders for interest and foreign exchange transactions	5 years following the termination of the contractual relationship	Fulfilling legal obligation: Investment Regulations Act Section 44 (1), Section 44 (2)  Executing customer orders: Performance of a contract	Identification data, contact information, transactions covered by MiFID II, the name of the natural person acting on behalf of the corporate customer in the compliance and suitability test performed. The Bank is investigating the financial standing and investment goals of the legal person, not the representative thereof
15	Customer Due Diligence	Compliance with the customer due diligence and risk rating obligation set out in Sections 6, 6/A, 7 and 10 of Act LIII of 2017 on the prevention and combating of money laundering and terrorist financing ("AML Act")	8 years following the termination of the business relationship, or 10 years in case of authority inquiry (Sections 56-58 of the AML Act.)	Fulfilling legal obligation	Data group according to the AML Act
16	Document copy	Obligation of customer due diligence, handling document copy pursuant to Section 7 (8) and (8a) of the AML Act	8 years following the termination of the business relationship, or 10 years in case of authority inquiry (Sections 56-58 of the AML Act.)	Fulfilling legal obligation	Data of the document copy
17	Monitoring customer relationship	Continuous monitoring of customer due diligence and customer relationship (compliance with the legal obligation under Sections 10, 11 and 12 of the AML Act)	8 years following the termination of the business relationship, or 10 years in case of authority inquiry (Sections 56-58 of the AML Act.)	Fulfilling legal obligation	Data group according to the AML Act
18	Identifying the beneficial owner	Personal data of the beneficial owner (compliance with the customer due diligence obligation under Sections 8 (2), 9 (1) and 13 of the AMT Act)	8 years following the termination of the business relationship, or 10 years in case of authority inquiry (Sections 56-58 of the AML Act.)	Fulfilling legal obligation	Data group according to the AML Act

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19	Politically exposed person	Customer due diligence, checking the status of politically exposed person (compliance with the obligation under Section 9/A of the AML Act)	8 years following the termination of the business relationship, or 10 years in case of authority inquiry (Sections 56-58 of the AML Act.)	Fulfilling legal obligation	Data group according to the AML Act
20	Source of fund/asset	Customer due diligence, checking the source of fund or asset (compliance with the obligation under Section 9/A, 16 (3) and 16/A of the AML Act)	8 years following the termination of the business relationship, or 10 years in case of authority inquiry (Sections 56-58 of the AML Act.)	Fulfilling legal obligation	Data group according to the AML Act
21	FATCA	Fulfilling the customer due diligence, identification and reporting requirements according to FATCA	The retention period of FATCA documentation is 8 years following the termination of the business relationship, or 10 years in case of authority inquiry (Sections 56-58 of the AML Act.)  In case of reports, 8 years after the end of the reference year	Fulfilling legal obligation (Act XIX of 2014 on the Promulgation of the Agreement between the Government of Hungary and the Government of the United States of America on the Promotion of International Tax Compliance and the Implementation of the FATCA Regulations, and on Amendments to certain related acts). Act CXC of 2015 on the Promulgation of a Multilateral Agreement between the Competent Authorities on the Automatic Exchange of Information on Financial Accounts; Pursuant to Act XXXVII of 2013 on Certain Rules of International Administrative Cooperation in relation to Tax and other Public Charges	Identification data, tax residence data, foreign tax identification number

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No.	Topic	Purpose of processing	Duration of personal data processing	Legal basis of data processing	Scope of processed personal data
22	CRS	Compliance with customer due diligence and reporting obligations according to CRS	The retention period of CRS documentation is 8 years following the termination of the business relationship, or 10 years in case of authority inquiry (Sections 56-58 of the AML Act.)  In case of reports, 8 years after the end of the reference year	Fulfilling legal obligation (Act CXC of 2015 on the Promulgation of a Multilateral Agreement between the Competent Authorities on the Automatic Exchange of Information on Financial Accounts, and Act XXXVII of 2013 on Certain Rules of International Administrative Cooperation in relation to Tax and other Public Charges (Public Charges Act), and Act CXCII of 2015 on amendments to certain acts)	Identification data, tax residence data, foreign tax identification number
23	Risk management	Personal data processing for risk management (for credit appraisal purposes) (if arises for customers with legal entity) Section 98 (1), (2), Section 99 (3) of the Credit Institutions Act, Government Decree 361/2009 (XII.30.)	8 years after the termination of the contract or claim following the ending of all credit relations (Accounting Act, Section 169 (2), AML Act, Section 56-57)	Fulfilling legal obligation (Credit Institutions Act, Section 98, 99)	Identification data; financial and income data for collateral valuation
24	Complaint management	Investigation of complaints received by the Bank	5 years following the year of the reference period (Credit Institutions Act, Section 288 (2))	Fulfilling legal obligation (Section 288 of Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises ("Credit Institutions Act"))	Name, e-mail, telephone, subject and content of the complaint

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No.	Topic	Purpose of processing	Duration of personal data processing	Legal basis of data processing	Scope of processed personal data
25	Claims management	Managing outstanding debts related to the concluded contract (collection of receivables)	8 years after full recovery or writing off claims	Legitimate interest of the Bank	Name, birth name, mother's birth name, place of birth, date of birth, citizenship, address, mailing address, identity card (passport) number, other ID number suitable as proof of identity according to the Act on keeping records on the personal data and address of citizens; place of stay in Hungary for foreign nationals; name and position of persons entitled to represent a legal person or an unincorporated organization, identification data of a natural person's agent for service of process as listed above; data of edge property data serving as collateral
26	Legal representation	data transfer to a lawyer for the purpose of enforcing legal claims	8 years after the termination of legal representation or the closure of litigation/non-contentious procedures	Legitimate interest of the Bank	Data required for providing legal representation
27	Recruitment, selection	Administration related to searching for candidates	In case of unsuccessful application, the date of closing the application (selection), but not later than 1 year after the closing of the application (selection) in case there is a separate consent	The consent of the data subject	Data sent in the curriculum vitae and its attachments (if any)

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No.	Topic	Purpose of processing	Duration of personal data processing	Legal basis of data processing	Scope of processed personal data
28	Data related to the employment relationship	Performing the labour law, labour and administrative tasks relating to establishing, maintaining and terminating the employment relationship.	<p>Unless a longer period is not prescribed by law, then for 3 years after the termination of the employment relationship, that is, until the end of the limitation period under labour law (Section 286 (1) - (2) of the Labour Code). If the law prescribes a longer period, then:</p> <ul style="list-style-type: none"> <li>• an accounting document (including general ledger accounts, analytical and detailed records) directly and indirectly supporting the accounting records shall be retained for 8 years (Section 169 (1) - (3) of the Accounting Act),</li> <li>• personal data specified in the Act on the Rules of Taxation, such as the documents serving as the basis for determining the tax or tax advance by the specific employer (payer) shall be retained for 5 years from the last day of the calendar year when the tax was due (Act on the Rules of Taxation, Section 78 (3) - (4),</li> <li>• personal data specified in the Act on Social Security Benefits and the Funding for these Services, and in the Act on Compulsory Health Insurance Benefits shall be retained until the last day of the 6th calendar year following the year the employment relationship was terminated, unless a longer retention period is required by law,</li> <li>• documents essential for the enforcement of citizenship rights (e.g. the right to pension: including employment documents containing data on earnings or income to be taken into account for establishing the periods of service or determining the pension, etc.) shall be retained by the Bank for 5 years after reaching the retirement age applicable to the data subject, according to Section 99/A of Act LXXXI of 1997 on Social Security Pension Benefits (Social Security Benefits Act).</li> </ul>	Performance of a contract (e.g. payment of wages), fulfilment of the employer's legal obligations (e.g. tax and accounting obligations)	The employee's personal data necessary for the establishment of the employment relationship and for the exercise of legal and contractual rights arising from the employment relationship and the fulfilment of legal obligations, as well as the bank account number, data attesting education and contact details. The scope of such personal data includes in particular: name, birth name, place of birth, date of birth, mother's birth name, place of residence, place of stay (if different from place of residence), tax identification number, social security number (TAJ), pensioner ID number (in case of a retired employee), identity card number, official address card number, current account number, copy of document attesting educational qualifications, data on wages, position, working hours, work schedule and vocational qualifications, data on professional experience, data on sick leave and leave of absence, name, place and date of birth of children under 16 (if the employee wishes to use leave of absence for caring for a child), photograph (only with consent)

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No.	Topic	Purpose of processing	Duration of personal data processing	Legal basis of data processing	Scope of processed personal data
29	Training, further training	Individual or group training of employees to comply with the legal requirements/management development plan/required competencies for the position	Until the purpose of the data processing is achieved, but no later than 3 years after the year of termination of the employment relationship or, if the data processing is based on consent, and such consent was withdrawn earlier, then until the consent was withdrawn	Performance of a contract or the consent of the data subject (depending on the training)	Name, position
30	Event	Organizing events, sending out invitations	Until consent is withdrawn, but maximum 5 years;	Consent	Name, corporate phone number, corporate e-mail address, position
31	Audio recordings	Audio recordings for the purpose of making a legally effective statement (e.g. granting authorization) or making a complaint	5 years after the audio recording	Hungarian Banking Act, Section 288 (2), Directive 2014/65/EU of the European Parliament and of the Council on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU (Regulation MIFID 2) – compliance with a legal obligation	Data provided in the recorded conversation
32	Access control at central building	Providing access rights to the part of the central building that is not open to customers	1 year after the year in which the right of entry expires (Security Service Act, Section 32)	Legitimate interest with respect to also Section 32 of Act CXXXIII of 2005 on the Rules of Security Services and Private Investigators (Security Services Act)	Name



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33	Camera	Video surveillance is installed in the Bank's business premises for the following purposes: - Prevention and documentation of robbery and other crimes, - Protection of business, banking and securities secrets, - Protection of human life, integrity and personal freedom, - Enforcement of damage claims	60 days from the day of recording. After that the data are erased automatically and irreversibly. If, however, the Bank receives any queries from authorities during said period or the recordings become necessary for the Bank to enforce its claims under civil law, the Bank retains the recordings as long as their use as evidence in a criminal or civil proceeding is necessary.	The Bank's legitimate interest (Article 6 (1) f) of the GDPR and Section 31 of the Security Service Act).	Video recordings (face, body)
34	Processing of data related to the partners not considered customers of the Bank	Concluding and performing contracts necessary for the operation of Commerzbank Zrt.	The limitation period for contractual obligations (5 years)	Performance of a contract	Natural person's data in the specific contract
35	Invoicing	Administrating incoming invoices, issuing outgoing invoices	8 years after the end of the year following the reference year (Accounting Act, Section 169 (2))	Performance of a contract	Invoice data prescribed in Section 169 of the VAT Act, as well as any other data indicated in incoming invoices, and documents serving as the basis for invoicing
36	Data reporting to OBA (National Deposit Insurance Fund of Hungary)	Fulfilling the data reporting requested by OBA on the basis of statutory authorization	8 years after the end of the year following the reference year	Fulfilling legal obligation (Section 228 of Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises)	Data requested by OBA

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37	Data reporting to MNB (Central Bank of Hungary)	Fulfilling the data reporting requested by the Central Bank of Hungary which supervises the Bank, and mandatory data reporting required by law	8 years after the end of the year following the reference year	Fulfilling legal obligation	Data necessary for the data reporting requested by the Central Bank of Hungary and for mandatory data reporting required by law
38	Data reporting to BEVA (Investor Protection Fund)	Fulfilling the data reporting requested by BEVA on the basis of statutory authorization	8 years after the end of the year following the reference year	Compliance with a legal obligation (Act CXXXVIII of 2007 on Investment Firms and Commodity Dealers, and on the Regulations Governing their Activities Investment Regulations Act), and Act CXX of 2001 on the Capital Market (Capital Market Act)	Data requested by BEVA
39	Whistleblowing	Receiving and managing whistleblowing reports, operating the whistleblowing system	Pursuant to Sections 16 (5) and (6) of Act CLXV of 2013 on Complaints and Public Interest Disclosures, if the report is not substantiated or no further action is required, the data related to the report shall be deleted by the Bank within 60 (sixty) days after the completion of the investigation. If action is taken on the basis of the investigation – including action against the reporting person as a result of legal or disciplinary action – the Bank shall process the data related to the report until the final closing of the proceedings initiated on the basis of the report.	Fulfilling legal obligation	Data provided by the reporting person
40	Prevention of fraud	Prevention/management of fraud	Until the expiry of the claim arising from the payment transaction (Hungarian Banking Act, Section 165 (5))	Hungarian Banking Act, Section 107 d), g) – Compliance with a legal obligation	Data related to a fraudulent payment transaction
41	Exercising the rights under data protection law	Inquiry related to exercising the data subject's rights attached to personal data, the Bank's response thereto, related inquiry by an authority	5 years following the year of the reference period	Legitimate interest	Data included in the inquiries, data required for response by the Bank

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No.	Topic	Purpose of processing	Duration of personal data processing	Legal basis of data processing	Scope of processed personal data
42	Purchase of receivables	Sale of overdue receivables	8 years after sale	Performance of a contract	Name, birth name, mother's birth name, place of birth, date of birth, citizenship, address, mailing address, identity card (passport) number, other ID number suitable as proof of identity according to the Act on keeping records on the personal data and address of citizens; place of stay in Hungary for foreign nationals; name and position of persons entitled to represent a legal person or an unincorporated organization, identification data of a natural person's agent for service of process as listed above; data of edge property data serving as collateral