

### Appendix 3

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Budapest, 6 March 2026

## PROCESSING OF PERSONAL DATA

The MNB shall process the personal data obtained within the scope of these Business Terms and Conditions as follows.

1. The client shall ensure that the transfer of his personal data, provided within the scope of these Business Terms and Conditions, takes place legitimately.  
The MNB shall process the personal data – provided by the client, or brought to the knowledge of the MNB in any other way or obtained by the MNB in any other way or from any other source, during the existence of the legal relationship in relation to the services falling within the scope of these Business Terms and Conditions and to the termination of the legal relation between the MNB and the client – confidentially, in accordance with the effective laws, ensuring proper data protection and data security.
2. In the course of its data processing activity, the MNB shall act on the basis of the provisions of Regulation 2016/679/EU of the European Parliament and of the Council of 27 April 2016 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, of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information, as well as of the provisions of these Business Terms and Conditions and the contractual representations made on the basis of those, and of the internal rules, regulations and information notes related to the protection of personal data provided by the client.
3. During the performance of its activity, the MNB shall proceed in respect of the data processing considering the following principles:
  - – it shall process the personal data in its possession lawfully, fairly and in a transparent manner in relation to the data subject;
  - – it shall process personal data only for specified and explicit purposes, with a view to exercising rights and discharging obligations;
  - – it shall process the volume of data truly necessary for the performance of its activity; it will control and process only such personal data that are essential and suitable for realising the purpose of the data processing;
  - – it shall pursue its data processing activity only to the degree and for the period specified in the laws and necessary for the realisation of the purpose; upon the expiry of the statutory conditions and the purpose, it shall delete, or – if it has the opportunity – anonymise the data;

- – it shall ensure the accuracy and completeness, and – when it is necessary in view of the data processing – the up-to-dateness of the data, as well that the data subject can be identified and related to the data only for the period necessary for the purpose of the data processing;
- – it shall – bearing in mind the prevailing technology, the costs of implementation, the nature, scope, circumstances and purpose of its data processing activity, as well as the risks of varying probability and severity – develop and formulate such technical and organisational measures that provide adequate guarantee for the MNB's compliance with the relevant statutory requirements;
- – when performing its activities related to data processing, it shall pay special attention to ensuring, by default, compliance with the data protection requirements, and the confidential processing of personal data as a secret;
- – it shall ensure that compliance with the aforementioned principles and the MNB's data processing activity, as well as the entire life cycle of the data processing are documented and transparent.

#### 4. Legal basis of the data processing

The MNB shall process the personal data, obtained within the scope of its services regulated by these Business Terms and Conditions, primarily for the purpose of the services rendered by it, as well as for discharging the contractual obligations mutually undertaken by the parties, and for preparing the establishment of the contractual relationship.

The MNB is obliged, in the cases and within the scope stipulated by the law, to request the client that he should provide the data and information necessary for the purpose of the data processing, and submit the documents confirming such data, and to process the information and personal data included therein.

The MNB shall process the personal data of the other data subjects only in relation to the fulfilment of the contracts, falling within the scope of these Business Terms and Conditions, concluded or to be concluded with the client, based on the express or presumed consent of the data subjects. The MNB presumes that the other data subject has lawfully consented to the transfer of data related to the other data subject, obtained by the MNB through the client, and that there is a legal basis for the processing of the data by the client, if the client initiates the cash transaction falling within the scope of these Business Terms and Conditions, signs the contract or the related other declarations and documents. The MNB reserves the right to verify the authenticity and content of the consents of these other data subjects, and – if necessary – directly contact the respective data subjects with a view to verifying the existence of or acquiring their consent.

The MNB shall transfer, within the framework of *cooperation established between the central banks and national supervisory authorities of EEA Member States to support access to payment systems operated by individual central banks*:

- information on the fact and outcome of the connection to the supervisory authority of the payment service providers and their branches whose registered office is in another EEA Member State;
- the declaration of conformity pursuant to section 8.1 (d) of these Business Terms and Conditions and the related documents, or any data contained therein to the supervisory authority of the payment service providers and their branches whose registered office is in another EEA Member State;
- in the case of a payment service provider in Hungary, the declaration of conformity pursuant to section 8.1 (d) of these Business Terms and Conditions and the related documents to the operator of the payment system operated by the central bank of the other EEA Member State to which it ends to connect.

In this case, the legal basis for data processing is the performance of the MNB's statutorily defined public interest tasks.

The client is entitled to know at any time the type of personal data processed by the MNB in relation to the services rendered to him.

The MNB shall not be liable for the damages arising from incorrect, incomplete or inaccurate data provided to it by the client.

#### 5. Purpose of data processing

The primary purpose of the data processing is to perform the services falling within the scope of these Business Terms and Conditions, rendered by the MNB, and to fulfil the statutory data processing based on the legal provisions governing this activity of the MNB. The MNB shall use the data taken from the clients, transferred by the data subject, or provided to or obtained by it in any other way, solely in accordance with the provisions of and for the purposes stipulated in these Business Terms and Conditions, the contracts concluded on the basis thereof and in the laws governing its activity falling within the scope of these Business Terms and Conditions.

#### 6. Duration of the data processing; data deletion

In the case of a legal relationship falling within the scope of these Business Terms and Conditions, the MNB shall process, for accounting purposes, all data obtained by it and connected with the rendering of the service falling within the scope of these Business Terms and Conditions until the end of the 8<sup>th</sup> year after the termination of that legal relationship, with the exception of those individual cases when the law prescribes longer retention period, except when the data processing is based on law; in this case the MNB shall manage the personal data until the expiry of the deadline stipulated in the relevant law.

If the client initiated at the MNB the conclusion of the contract falling within the scope of these Business Terms and Conditions, but the contract has not been concluded due to any reason, the MNB shall process the personal and other data related to the contract, qualifying as bank secret, as long as claims related to the frustration of the contract may be enforced; this – in the absence

of any statutory provision to the contrary – shall be the general 5-year term of limitation, defined in the Civil Code.

The retention of the data of other data subjects is aligned with the retention of the client's data.

The data processing durations applicable to special data processing – in particular to voice and video recordings, and complaint management – are included in the Data Processing Information<sup>1</sup> available on the MNB's website.

In accordance with the principle of storage limitation, the MNB shall pursue its data processing activity only to the degree and for the period specified in the laws and necessary for the rendering of the service falling within the scope of these Business Terms and Conditions, and for the realisation of the purpose of the data processing; upon the expiry of the statutory conditions and the purpose of the data processing, it shall delete, or – if it has the opportunity – anonymise the data.

The MNB – at its discretion – shall delete or anonymise the data, when the specified duration of the data processing expires, or prior to that if:

- – the data subject asks for this and there is no legal obstacle to the deletion, and the deletion does not prejudice the legitimate interest of the MNB or of any third party affected by the transaction and the data processing, in particularly its interest in filing, enforcing or protecting legal claims;
- – the law orders the deletion of the data;
- – the court or public authority has validly ordered it.

7. The rights of and remedies available to the data subject are included in the MNB's general data processing information.

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<sup>1</sup> <https://www.mnb.hu/a-jegybank/informaciok-a-jegybankrol/gyakorlati-tudnivalok/adatvedelmi-tajekoztato>