Raiffeisen Bank

Privacy Policy

for currency exchange activities

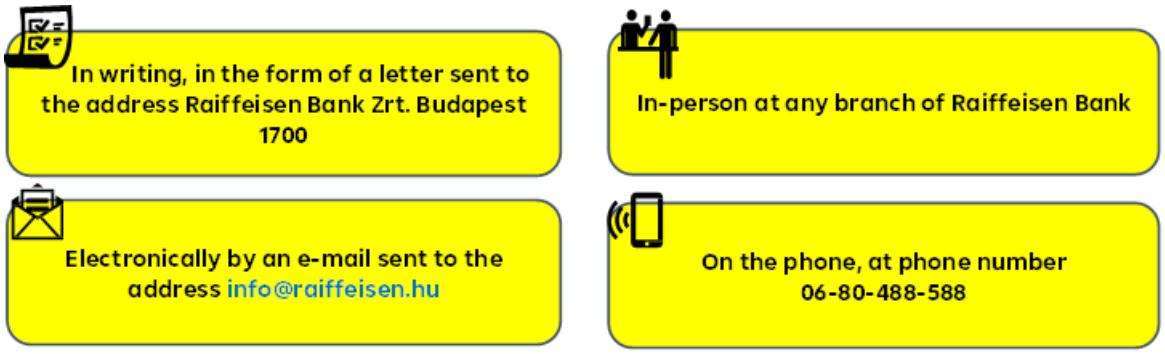
Effective as of: 25 September 2026

1. General provisions

Dear Data Subject, please be informed that you can find detailed information on the processing of your personal data by Raiffeisen Bank Zrt. (the "Bank") as a controller in our General Privacy Policy, available in the Bank's website; however, we think it is also important that we describe in detail some distinguishing characteristics of this particular data processing.

1.1. Controller: Raiffeisen Bank Zrt. (registered office: 1133 Budapest, Váci út 116-118.)

1.2. Contact details of the Bank's data protection officer



The Bank's data protection officer is dr. Dunár Ildikó

2. The purpose, legal basis and duration of processing

The Bank is one of the key players of the Hungarian financial market that provides universal services. Its reliable operation rests on the expertise of its staff, the high-level service offered to the customers, and a well-capitalised shareholder background.

Pursuant to Art. 3 (2) a) of Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises (the "Banking Act"), the Bank may, as a supplementary financial service, perform currency exchange activities (hereinafter "currency exchange activities") in HUF, foreign currency and foreign exchange on a commercial scale.

In order to carry out its currency exchange activity, the Bank has, pursuant to Art. 75 (1) of the Banking Act, appointed currency exchange agents (hereinafter "Currency Exchange Agent") as special services intermediaries, who act as the Bank's data processors with regard to the processing related to the currency exchange activity covered by this Policy.

The purpose of the data processing is to enable the Currency Exchange Agents to fulfil their customer due diligence under Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (the "Money Laundering Act") and other legal obligations detailed in the Money Laundering Act and in other legislation in relation to the natural person customers using the services related to currency exchange activities and, in the case of legal entities and unincorporated entities, their natural person representatives and proxies.

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The table below shows the types of processing related to currency exchange activities.

Processing type	Processing purpose	Legal basis of the processing	Categories of processed data	Retention period
One-time money exchange order	Performance of the legal obligation as per Articles 6 to 14/A of the Money Laundering Act.	**Legal obligation** Art. 6 (1) (c) of GDPR	Family name and given name; family name and given name at birth; place and date of birth; mother's maiden name; nationality; address; place of stay; in the case of legal persons, nature and extent of the natural person's ownership interest; type and number of identity document, copy of identity document, declaration on politically exposed person status; level of risk; proof of source of funds and assets.	Normally 8 (eight) years from the termination of the business relationship or the performance of the transaction order, in accordance with Articles 55 to 57 of the Money Laundering Act. In special cases, at the request of the supervisory authority, the financial information unit, the investigating authority, the public prosecutor's office or the court, the period specified in the request, but not more than 10 years from the termination of the business relationship or the execution of the transaction, pursuant to Art. 58 of the Money Laundering Act.
Currency exchange reaching or exceeding HUF 100,000				
Currency exchange reaching or exceeding HUF 300,000				
Keeping records of currency exchange transactions of HUF 4.5 mio or more	Performance of the legal obligation set out in Art. 57 (3) of the Money Laundering Act and MNB Decree 26/2020 (VIII.25.) on the detailed rules of the implementation of the Act on the Prevention and Combating of Money Laundering and Terrorist Financing concerning the service providers supervised by the MNB, and on the detailed rules of the minimum requirements for the elaboration and operation of the screening system as per the Act on the Implementation of the Financial Restrictive Measures Ordered by the European Union and the UN Security Council.			
Mandatory risk assessment of regular and/or large-value or unusual currency exchange transactions (Monitoring)	Mandatory risk assessment of complex transactions and financial operations that are considered unusual or having no economic or legitimate purpose; risk analysis to prevent money laundering and terrorist financing.			
Handling suspected counterfeit notes	Ensuring compliance with the statutory provisions concerning suspected counterfeit notes in accordance with MNB Decree No. 1/2023. (I. 17.) on the processing and distribution of banknotes, and on technical tasks relating to their protection against counterfeiting.		The personal data specified in Annex No. 4 to MNB Decree 1/2023. (I. 17.) (minutes concerning suspect counterfeit banknotes).	8 weeks from the deposit in accordance with Art. 22 (4) of MNB Decree 1/2023. (I. 17.)
Complaint management	Full investigation of and response to the data subject's complaint in accordance with Article 288 of the Banking Act.		Family name and given name; family name and given name at birth; place and date of birth; mother's maiden name; nationality; address; place of stay; telephone number; email address; content of complaint.	5 years after the final closure of the complaint, pursuant to Article 288 (2) and (3) of the Banking Act.

3. Data subjects

The natural person customer or, in the case of a legal person or unincorporated entity customer, the natural person representative or proxy of the customer using the service related to the currency exchange activity, and, in the case of a complaint, another natural person. The Bank collects the personal data directly from the data subject.

4. Involvement of data processors

Please be informed that in the scope of the processing of personal data the following processors are engaged by the Bank:

- CORNER TRADE Kereskedelmi, Szolgáltató Korlátolt Felelősségű Társaság (registered office: 1065 Budapest, Podmaniczky utca 1.; company registration number: 01-09-709685; tax number: 11106258-2-42)
- "FIKCIÓ 3" Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság (registered office: 9200 Mosonmagyaróvár, Jókai Mór utca 7.; company registration number: 08-09-008017; tax number: 11790860-2-08)
- Gráf Plusz Korlátolt Felelősségű Társaság (registered office: 2900 Komárom, Igmándi út 16.; company registration number:11-09-026224; tax number: 26367057-2-11)
- GYORSPÉNZVÁLTÓ Pénzügyi Korlátolt Felelősségű Társaság (registered office:1011 Budapest, Corvin tér 10.; company registration number: 01-09-267956; tax number: 10884247-4-41)
- IBUSZ Utazási Irodák Kft. (registered office:1118 Budapest, Dayka Gábor u 3.; company registration number: 01-09-266780; tax number: 10871403-2-43)
- Interchange Pénzügyi Szolgáltató Korlátolt Felelősségű Társaság (registered office:1011 Budapest, Corvin tér 10.; company registration number: 01-09-169375; tax number: 10740862-4-41)
- Magyar Pénzváltó Kereskedelmi Korlátolt Felelősségű Társaság (registered office:1011 Budapest, Corvin tér 10 .; company registration number: 01-09-361615; tax number: 10937266-4-41)
- SZALAI-DODÁ Szolgáltató Korlátolt Felelősségű Társaság (registered office: 9400 Sopron, Torna utca 1.; company registration number: 08-09-025641; tax number: 11464660-2-08)
- Trenta Korlátolt Felelősségű Társaság (registered office: 2900 Komárom, Igmándi út 16. 697/3/A/27. ép.; company registration number: 11-09-023814; tax number: 25337875-2-11)
- EXCLUSIVE BEST Change Pénzügyi Zártkörűen Működő Részvénytársaság (registered office: 7621 Pécs, Citrom utca 2-6. fszt. 26. ajtó; company registration number: 02-10-060505; tax number: 32313332-2-02)
- Exclusive Change Zártkörűen Működő Részvénytársaság (registered office: 1012 Budapest, Vérmező út 4.; company registration number: 01-10-142020; tax number: 32071735-2-41)
- Exclusive Special Change Pénzváltó Korlátolt Felelősségű Társaság (registered office: 1051 Budapest, Szent István tér 3. pincesz.; company registration number: 01-09-690632; tax number: 12522387-2-41)
- Expressz Ékszerház és Minibank Korlátolt Felelősségű Társaság (registered office: 7621 Pécs, Citrom utca 2-6. II. em. 16.; company registration number: 02-09-081434; tax number: 14040535-2-02)
- Good Change Kereskedelmi Korlátolt Felelősségű Társaság (registered office:1051 Budapest, Szent István tér 3. .; company registration number: 01-09-562634; tax number: 12185362-1-41)

5. Data transfer

The Bank and the Currency Exchange Agent may, subject to the existence of an appropriate legal basis, transfer the personal data of the data subject to the following recipients: MNB, investigative authorities, the AML Office of the National Tax and Customs Administration, other public bodies designated by law.

No data transfers are made to third countries.

6. Rights of data subjects

You shall have the right to request information through any of the above communication channels of the Bank at any time about the processing of your personal data, or access such data, and may furthermore request your personal data to be rectified, erased or restricted, and you are also entitled to the right to object to the processing of your personal data. For more details concerning your rights, see the Bank's General Privacy Policy, in the chapter "Rights of the data subjects".

7. Legal remedies

In case you suppose that your rights to privacy have been violated, you may refer to the Bank's Data Protection Officer and inform him/her of the problem related to the Bank's data processing, as well as request information from him/her or ask for his/her opinion.

If you disagree with the opinion of the Bank's Data Protection Officer, but also regardless of that, upon any violation of your rights related to the protection of your personal data, you may refer your complaint to the Hungarian National Authority for Data Protection and Freedom of Information (registered office: 1055 Budapest, Falk Miksa utca 9-11., mailing address: 1363 Budapest, Pf. 9, telephone: +36-1-391-1400, fax: +36-1-391-1410, e-mail: ugyfelszolgalat@naih.hu) for remedy.

In case you suppose that your rights to privacy have been violated, you also have the right to refer to a court. You can bring the action before the court having jurisdiction and venue, that is, the court of the defendant's domicile or, at your choice, the court of the place where you live or reside. You may look up the court having jurisdiction in legal disputes related to data processing at the following link: http://birosag.hu/ugyfelkapcsolati-portal/illetekessegkereso.

8. Further information

The Bank shall have the right at any time to change the content of this policy in its sole discretion, without giving any special notice. Such changes are not governed by the provisions of Chapter XIX of the General Business Conditions.

For more detailed information, please refer to the privacy policies available in the website www.raiffeisen.hu under the heading Data Processing, the Bank's General Business Conditions, and the relevant statutory provisions, including in particular the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation or GDPR), and you may as well ask for information through any communication channel of the Bank as detailed above.

For issues that are not regulated—or not regulated in sufficient detail—here, the provisions relevant to this legal relationship of the General Privacy Policy, available in the Bank's website, shall be governing.