

## **PRIVACY NOTICE**

The mobile phone application called MKB MobilApp is owned and operated by MKB Bank Zrt. (1056 Budapest, Váci utca 38.) as data controller. Anyone may download the MKB MobilApp application to a mobile device of a suitable version number, with an iOS or Android operating system. The user needs not have a business relationship with the data controller MKB Bank Zrt. in order to download and use the application. By using the application it takes only a few touches for the user to query his or her account balance and former or future transactions, or to make a transfer/book transfer through the MKB Mobilbank application. In addition to carrying out transactions the application enables the user to activate his or her bank card or modify its purchase or cash withdrawal limit, or even block the card for a while, when necessary. The application enables the user to receive messages from the Bank free of charge, in the form of push messages.

After performing a variety of analyses based on financial data uploaded by the user the data controller collects information and tips pertaining to spending transactions, savings and the envisaged financial objectives, and display suggestions for the user. Data concerning the user are always given in MKB MobilApp on a voluntary basis, but the data requested by the application may be necessary for the operator of the application to be able to provide its service and to transmit content elements relating to its service in the form of newsletters, business proposals or personalised direct communication – for example notices and advertisements (DM) – by personally contacting the user. The application itself does not store any personal data. Data supplied by the user and location data transmitted by the mobile device as well as data given by the user during registration with the service provider (including keeping records, rectification and erasure of data) as a prospective addressee of direct marketing communication and/or newsletters will be stored in a storage unit operated by the data controller (even via a data processor, as the case may be), separately from other data.

The data controller has carried out the preliminary data protection impact assessment concerning the MKB MobilApp service, as prescribed in Article 35 of the GDPR.

### **1 The purpose of data processing:**

1.1 The data controller will collect, process and store personal data required for the use of our MKB MobilApp services, for the following purposes:

1.1.1 Financial data pertaining to the user's income, spendings, savings, financial plans and objectives, the analysis of which enables the service provider to generate, provide and display information, tips and suggestions pertaining to spending, savings and how to progress towards financial objectives, in a verbal and graphical form.

1.1.2 Sending ad hoc, occasional or regular advertisement messages of a general nature or targeted direct marketing communications in the form of text messages, push messages, along with the transmission of newsletters, associated with the themes covered by the application.

The newsletters may also convey content elements qualifying as advertisements or as messages for direct business purposes (including the transmission of news, the assessment of financial needs or requirements, or cross selling opportunities).

1.1.3 Analysis of location data, working out the user's behaviour profile, establishment of user preferences as well as working out and transmitting targeted business propositions based on the user's behaviour patterns in the context of the data processing purpose identified in section 2.

## **1.2 Automated decision making and profiling:**

1.2.1 Automated data processing will also take place to facilitate the achievement of the purposes of data processing specified in this section. Such automated data processing will involve evaluation of certain personal characteristics of the personal data, that are of relevance to the natural person concerned, including the analysis and/or forecasting of characteristics and attributes associated with economic position, personal financial and other asset-related or spending preferences, interests, behaviour, place of stay or movements.

1.2.2 No automated decision making will take place during the use of the MKB MobilApp. Even profiling on the basis of information collected during the use of the application will be performed in order to achieve goals and objectives relating to analyses, effectiveness, development/improvement and in some cases (in a form rendered anonymous) statistics. Consumer and behaviour profiles generated by data analysis enable the development of personalised adverts and proposals enhancing the consumer experience. They also facilitate the continued development of the MKB MobilApp service, along with the development of new financial products.

1.2.3 The user is entitled to express his or her standpoint concerning the output of automated data analysis and profiling. In such cases the Bank processes and answers questions raised by the user in accordance with the rules governing the exercising of data subjects' rights.

1.2.4 Automated data analysis and consumer as well as behaviour profiling are the MKB MobilApp service's substantive elements, the blocking of which prevents the application's key functions from generating adequate data or permits them to generate data only with significantly poorer user experience, making it impossible to develop personalised proposals or offers.

## **2 The legal basis of data processing:**

Consent granted by the person concerned, as specified in Article 6 (1) a) of Regulation (EU) 2016/679 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 (General Data Protection Regulation, GDPR) for each and every one of the purposes of data processing specified in section 1.1.

### **3 The data to be processed:**

Identification data, financial and other personal data given by the customer or user or generated during the use of the application:

- A) Identification data: customer (user) name, address of permanent or temporary residence
- B) Contact data: landline or mobile telephone number, e-mail address
- C) Banking services: the number and type of the bank account, balance data, account history, transaction data in terms of bank account statement details (name and account number of the beneficiary, date and amount of transaction, content of the comments field), number, type and issuer of the bank card, bank card transaction data, limit settings
- D) Socio-demographic data, to the extent they are available: age, job, educational attainment, marital status, number of dependants
- E) Geolocation (location) data: based on the location service activated as part of the application the user's GPS coordinates, enabling the exact identification of the locations frequented by the user in terms of addresses, from which data can be generated concerning the user's behaviour as a consumer and the places preferred by the user, enabling conclusions to be drawn as regards the user's consumer behaviour.
- F) Other data processed during or generated in relation to the use of the application: data of the mobile phone running the application (manufacturer and type of the phone, type and version number of the operating system, the device's IMEI number, together with ANDROID\_ID, encrypted with the SHA512 process, Device ID, MobilApp channel analytic data), user behaviour patterns, consumption profile, financial and other spending and behaviour preferences, estimated data concerning future transactions expected to take place on the basis of spending habits and conclusions drawn from analyses of such data concerning revenues, spending and savings.

### **4 The duration of data processing:**

As regards financial data, personal data supplied by the user for the purposes of DM communication and the transmission of newsletters, geolocation (GPS) data and data on the customer's consumer behaviour and preferences, the duration of data processing lasts until the withdrawal of the user's consent. Data stored in the application will be held until the removal of the application or, in the absence of such removal, for a period not exceeding 3 years.

### **5 Place of data processing:**

Some of the data concerned will be stored in the application. Data supplied or extracted as part of the registration process or during the use of the application will be stored on the Bank's own servers. The Bank's headquarters or branch will function as the place of data retention. The user's data will not be stored in the context of a cloud-based service.

## **6 The processor engaged by the Bank:**

Processor: The Bank engages no processor for the time being.

## **7 The rights of the data subject, options for legal remedy:**

The user has the right to withdraw his or her consent to the processing of his or her data free of charge at any time, without limitations, restrictions and without having to provide reasons therefor. Moreover, the user has the right to request termination of the processing of his or her data for any specific purpose. Once the application is removed from the mobile device the controller will erase the user's data stored in its systems within 8 working days of learning of the removal of the application, permanently, in a way making it impossible to restore them. The user is entitled to know what geolocation (GPS) data are stored about him or her, together with the conclusions drawn from such data and has the right to request the controller to erase such data specifically, without prejudice to the service itself.

Since during the use of the application personal data will be processed for the purposes of direct marketing, the data subject has the right to object at any time to the processing of his or her personal data – including the practice of profiling – for such purpose.

Upon any change in the terms and conditions applying to data processing the controller will notify users of the changes in a push message on the application interface.

The user may request rectification and deletion of his or her personal data. The user has the right to object and to seek enforcement of his or her rights before the court. Deletion of the user's personal data may complicate or impede the proper use of the application. The user may request rectification or deletion of his or her data by e-mail, at [adatvedelem@mkb.hu](mailto:adatvedelem@mkb.hu).

Any request or complaint concerning the processing of the user's personal data should be submitted to the Bank. The user may submit his or her complaint concerning data protection to the Hungarian National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság, [www.naih.hu](http://www.naih.hu)) or the competent court.

For further details please visit [www.mkb.hu](http://www.mkb.hu) under “Adatvédelmi Irányelvek” (“Privacy Guidelines”) or “Adatvédelmi Tájékoztató” (“Privacy Information”).