



ALLIANZ OCCUPATIONAL PENSION PROVIDER CO. LTD.

Privacy Policy

on the processing of personal data

Effective from 01 November 2021

This document contains, with regard to Allianz Occupational Pension Provider Co. Ltd (hereinafter the Occupational Pension Provider) as Data Controller, provisions on the processing of the personal data it becomes aware of in the context of its activity and the rules on the Occupational Pension Secrets.

I. Key data of the Occupational Pension Provider

Name: Allianz Occupational Pension Provider Private Company Limited by Shares

Our registered office: 1087 Budapest, Könyves Kálmán krt. 48–52.

Our mailing address: 1242 Budapest, Po.: 471/2.

Company registration number: Budapest-Capital Regional Court as court of registration, Cg. 01 10 046806

Country of the registered office: Hungary

Electronic contacts: <https://www.allianz.hu/hu/nyugdijszolgaltato/>

Central telephone number: +36-1-237-2377

Central fax number: +36-1-429-1540

Contact details of the data protection officer: Allianz Occupational Pension Provider Co. Ltd's data protection officer; mailing address: 1087 Budapest, Könyves Kálmán krt. 48-52. or 1242 Budapest, PO Box: 471/2.

Our supervisory authority is the Central Bank of Hungary (registered office: 1013 Budapest, Krisztina krt. 55).

II. Rules on Occupational Pension Secrets

Occupational Pension Secret under Act CXVII of 2007 on Occupational Retirement Pension and Institutions for Occupational Retirement Provision (hereinafter the OPA) shall mean all facts, information or data available to or received by the occupational pension provider institution during its activity regarding a member or beneficiary of the occupational pension provider institution on the person, data, financial situation, business, ownership and trading relationships, and the member account of the employer pension fund member or beneficiary, the data recorded regarding the entitlement, the contributions paid to it and the supplements made by it, and also on the occupational pensions to which that person is entitled.

The occupational pension provider institution may handle business and occupational pension secret exclusively in the context of pursuing its occupational pension provision activity.

The rules applicable to fund secret set out in the legislation on voluntary mutual insurance funds shall apply accordingly to Occupational Pension Secrets.

Under Section 42/B (2) of Act XCVI of 1993 on Voluntary Mutual Insurance Funds (VMIF Act) Occupational Pension Secrets may only be disclosed to third parties if

- (a) the member or his legal representative grants authorisation for this, with a precise indication of the range of secrets related to him that may be disclosed, in an authentic instrument or a private document of full probative force,
- (b) the law provides for an exemption with regard to the obligation of occupational pension secrecy.

Under Section 40/B of the VMIF Act, the requirement of confidentiality concerning occupational pension secrets shall not apply to:

- (a) the Supervisory Authority,
 - (b) the State Audit Office of Hungary,
 - (d) investigating authorities and the public prosecutor acting within the scope of criminal procedures in progress and when supplementing criminal charges,
 - (e) in cases specified in a separate law, the organisation authorised to gather intelligence;
 - (f) public notaries acting in matters of inheritance, as well as the guardianship office acting in its competence,
 - (g) the national security service acting within its competence conferred upon it by law, based upon the special permission granted by the Director General,
 - (h) courts, in the context of criminal or civil cases, as well as bankruptcy and liquidation proceedings, or debt-settlement proceedings by local governments;
 - (i) the service provider with respect to data required for the administration of the business, and the outsourcing service provider with respect to data required for the outsourced activities,
 - (j) the tax authority, with regard to auditing compliance with tax obligations, and in a procedure initiated with a view to enforcing an enforceable deed establishing such a debt, and with regard to the discount for Pension Service Provider payments,
 - (k) the Competition Authority,
 - (l) subject to meeting the conditions set in a separate law, the body in charge of implementing restrictive financial and asset measures ordered by the European Union and UN Security Council,
 - (m) the Commissioner for Fundamental Rights,
 - (n) the main creditor, Family Bankruptcy Protection Service, family administrator, court acting in natural persons' debt consolidation procedures
- when these bodies make written requests to the occupational pension provider.

The occupational pension provider shall be required to inform the investigating authority, upon a request bearing an "Urgent measure" mark, without the approval from the prosecutor set out in a separate law, of any data processed by it, qualifying as business secret or Occupational Pension Secret that relates to the case concerned.

The obligation to keep a business secret or Occupational Pension Secret confidential shall also not apply when:

- (a) the Occupational Pension Provider complies with its notification obligation set out in the Act on the Prevention and Combating of Money Laundering and Terrorism Financing (hereinafter referred to as AML Act);
- (b) the authority acting as national financial intelligence unit makes a written request for information - that is considered business secret or Occupational Pension Secret - acting within its powers conferred under the AML Act or in order to fulfill the written requests made by a foreign financial intelligence unit.

III. Information on the processing of personal data

1. Processing of personal data

In connection with the subscription agreements and the establishment and administration of the membership of the employee members, and the performance of the occupational pension services or payments arising from them, the Occupational Pension Provider shall process, in its capacity as controller, the personal data (i.e. any data that allows conclusions to be drawn on the data subject) of its clients, i.e. the employee member, the beneficiary, and any other person replacing the employee member as heir – as natural persons affected by the data processing activities of the occupational pension provider (data subject), in accordance with the provisions 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 or GDPR), Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Privacy Act), the OPA, Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing, and the data protection provisions of any other applicable laws.

Personal data shall mean any information on an identified or identifiable natural person ("data subject"); identifiable natural person shall mean any person that can be identified directly or indirectly, in particular by way

of an identifier, such as name, number, location data, online identifier, or one or several factors related to that natural person's bodily, physical, genetic, psychological, economic, cultural or social identity.

The personal data of the employee member shall be transferred by the affiliated employer to the Occupational Pension Provider under Section 26 (2) of the OPA. The personal data of the beneficiary member shall be transferred by the employee member to the Occupational Pension Provider under Section 31 (1) of the OPA. These data shall not be originated from publicly available sources.

The Occupational Pension Provider shall provide data subjects with the following clear and detailed information on the processing of the data subjects' personal data.

1.1. The Occupational Pension Provider's data relating to data processing

The contact details of the Occupational Pension Provider as Controller are set out in Paragraph I.

1.2. Data processing unrelated to the conclusion of the subscription agreement, the establishment of the membership and the performance of the occupational pension services arising from them

Data subjects shall be informed separately by the Occupational Pension Provider on data processing unrelated to the conclusion of the subscription agreement, the establishment of membership and the performance of the occupational pension services arising from them and based on the data subject's consent.

If a data subject submits a complaint to Allianz Hungária Zrt. (the Occupational Pension Provider's owner) or Allianz SE, Allianz Hungária Zrt. or Allianz SE will process the data of that person, including, if necessary, contacts with the Occupational Pension Provider, in accordance with the GDPR.

1.3. Data processing after the conclusion of the subscription agreement, in connection with the establishment of membership and the performance of the occupational pension services arising from it

1.3.1 The purpose of data processing, and the duration of data processing

The Occupational Pension Provider shall process personal data on the basis of the law, contractual obligation, the data subject's consent and the legitimate interest of the Occupational Pension Provider. In the case of the data subject's consent, data provision is voluntary.

(a) After the conclusion of the subscription agreement, the Occupational Pension Provider shall process personal data provided after the conclusion of the subscription agreement in the framework of the reporting by the affiliated employer, or by the employee member during the appointment of beneficiaries, or obtained by the Occupational Pension Provider on the data subject in any other manner with a view to maintaining the subscription agreement and the membership arising from it, to perform and settle the occupational pension service and to enforce any right arising from it.

The data subject shall be required to provide personal data and sensitive data relating to the health status of the data subject, required for the performance of the occupational pension service.

Where the data subject fails to provide the Occupational Pension Provider with his personal data required for the performance of the occupational pension service, the Occupational Pension Provider may refuse to perform the occupational pension service.

The Occupational Pension Provider may process personal data during the period of the membership, and after the termination of the membership as long as any claim can be enforced in connection with that membership relationship, but at least for eight years after the termination of membership.

The Occupational Pension Provider may use any personal data it processes for statistical purposes (market research, product development, analysis of consumer behaviour), during the period specified herein.

(b) If the data subject submits a complaint against the Occupational Pension Provider in connection with the conclusion of the subscription agreement, the establishment of membership or their performance then, in order to conduct the complaint handling procedure, the Occupational Pension Provider will process the data subject's personal data provided to it by the data subject in connection with complaint handling or the personal data

processed by the Occupational Pension Provider during the conclusion of the subscription agreement, the establishment of membership or the performance of such, which are related to complaint handling. The Occupational Pension Provider will retain personal data for the purpose of complaint handling – including audio recordings in the case of complaint handling over the phone – for five years after the completion of the complaint handling procedure.

(c) In cases specified by law, in order to fulfil a legal obligation, the Occupational Pension Provider shall be required to process the data subjects' personal data specified by law, for the purposes and the period specified by law.

The Occupational Retirement Provider will process the data specified by the legislative provisions on accounting, taxation and money laundering in the manner and for the period specified in those provisions.

(d) In cases specified by law, in order to fulfil a legal obligation or to perform a public interest task, the Occupational Pension Provider shall be required to transfer the data subjects' personal data to other controllers for the purposes and period specified by law.

(e) Where the data subject granted express consent to the Occupational Pension Provider to send marketing and/or advertising messages to him, the Occupational Pension Provider shall process his data related to his contract also in the context of these purposes, within the period specified in Paragraph 1.3.1 (a), but until the withdrawal of that consent at the latest.

1.3.2 The legal basis of data processing

(a) in the case referred to in the above Paragraph 1.3.1, the Occupational Pension Provider shall process the data subject's data required for the performance of the occupational pension service, with the exception of personal data qualifying as sensitive data (health data), on the basis of the membership established by the subscription agreement. The affiliated employers' obligation for the transfer of the members' personal data as set out in the OPA shall provide the basis for the legitimate interest of the Occupational Pension Provider for data processing. The processing and storage of such data is essential for the maintenance of membership and this legitimate interest is proportionate to the processing of the employee members' personal data.

(b) The Occupational Pension Provider shall process the data subject's health data on the basis of the written consent granted by the data subject, or if the data subject is unable to grant this consent due to his physical or legal incapacity, with a view to protect the vital interests of the data subject or other natural persons. This consent is contained in the service/disbursement claim form.

(c) The data transfer referred to in the above Paragraph 1.3.1 (d) is a legal obligation of the Occupational Pension Provider.

(d) The data transfer referred to in the above Sections 1.3.1 (b) and (c) is a legal obligation of the Occupational Pension Provider.

(e) The Occupational Pension Provider is engaged in the data processing referred to in the above Paragraph 1.3.1 (e) on the basis of the consent granted by the data subject.

1.3.3 Recipients of the data, categories of the data concerned, and the categories of recipients:

1.3.3.1 Use of processors

Contributors acting on the basis of the mandate from the Occupational Pension Provider shall be entitled to process any personal data of the data subjects provided to them by the Occupational Pension Provider during the term of their mandate and in accordance with the instructions from the Occupational Pension Provider.

a) The Occupational Pension Provider shall use intermediaries in the conclusion of subscription agreements, the establishment of membership and their maintenance and performance. These intermediaries shall act upon the mandate from the Occupational Pension Provider; as such, they process the data subjects' personal data in accordance with the instructions from the Occupational Pension Provider as processors.

Information on the name and address of eligible intermediaries used by the Occupational Pension Provider may be obtained from the Central Customer Service Office of the Occupational Pension Provider [1087 Budapest, Könyves Kálmán krt.48-52.].

- b) The Occupational Pension Provider will also use other contributors where the special expertise of a contributor is required for the pursuit of that activity or where, by involving a contributor, the Occupational Pension Provider is able to provide its service to the same quality but with lower costs and at a better price (outsourcing). Contributors performing outsourced activities shall act on the basis of an outsourcing contract in compliance with the OPA, and they shall process the data subjects' personal data as processors, according to the Occupational Pension Provider's instructions. Such contributors, amongst others, shall include the following:
- i. Allianz Hungáriai Biztosító Co. Ltd (company registration number: 01-10-041356, 1087 Budapest, Könyves Kálmán krt. 48-52.), provides IT and administration services on behalf of the Occupational Pension Provider.
 - ii. Ádám Zahorecz, private entrepreneur (9700 Szombathely Nagyváradi u. 7, provides software development services on behalf of the Occupational Pension Provider.
 - iii. Any further contributor the Occupational Pension Provider may use in the conclusion of the subscription agreement, the establishment of the membership and/or their maintenance and performance (e.g. persons involved in maintaining contact, persons providing IT, legal and accounting services).

Information on the name and address of contributors used by the Occupational Pension Provider may be obtained from the Central Customer Service Office of the Occupational Pension Provider [1087 Budapest, Könyves Kálmán krt.48-52.].

1.3.3.2 Data transfer

In the case referred to in the above Paragraph 1.3.1 (d), the Occupational Pension Provider must transfer the personal data it processes to the institutions, bodies and organisations specified in the law prescribing the relevant data transfer.

1.3.3.3 Categories of the data subjects' data

The Occupational Pension Provider's employees shall be entitled to access data subjects' personal data to the extent necessary for the performance of their duties, in connection with the following activities:

- (a) administration and management of subscription agreements,
- (b) establishment and administration of membership
- (b) performance of occupational pension services,
- (c) handling data processing-related complaints, questions and requests,
- (d) sales activities,
- (f) product management
- (g) marketing and advertising activity,
- (h) performance of planning, controlling, inspection, quality assurance, accounting, legal and IT operational tasks.

1.4. Processing the data of heirs and beneficiaries

The rights of the data subject with regard to data related to a deceased employee member may be exercised by the heir. To the extent necessary for the exercise of these rights, the processing of the data of heirs – including its

legal basis, purpose and duration – shall also be subject to the provisions of this privacy notice as set out in the previous points.

For a beneficiary named by the employee member, personal data related to the beneficiary as data subject will be provided by the data subject, under Section 31 (1) of the OPA. To the extent necessary for claiming and the performance of the occupational pension service by the beneficiary, the processing of the data of the beneficiary – including its legal basis, purpose and duration – shall be subject to the provisions of this privacy notice set out in the previous points accordingly.

1.5. Data security measures

The Occupational Pension Provider shall take all reasonable steps to prevent the unauthorised use of and unauthorised access to the personal data or the devices used for processing those personal data. The Occupational Pension Provider shall ensure the protection of the personal data it processes in accordance with the requirements of the GDPR.

The Occupational Pension Provider shall ensure the physical and logical protection of the data it processes, whether they are stored on paper or electronically. Access to personal data shall be restricted through appropriate technical solutions, and all instances of access shall be verifiable. The security of data processing performed by the Occupational Pension Provider is regulated by internal policies. Pursuant to the requirements, the Occupational Pension Provider shall classify all data it processes into security classes. The system of classification used by the Occupational Pension Provider sorts the data, and it specifies the individual security measures required for each data security class.

1.6. Automated decision making, profiling

The Occupational Pension Provider applies no automatic decision-making. Data processing takes place with human intervention.

1.7. Rights that can be exercised by the data subject

1.7.1 General Rules

Where data processing is based on the data subject's consent, the data subject may withdraw his consent at any time. The withdrawal of consent shall not affect the lawfulness of processing before such withdrawal. However, please note that if the consent provided in connection with the health data required for the provision of the occupational pension services is withdrawn, the Occupational Pension Provider may refuse to provide the services.

Under Articles 15-22 of the GDPR, the data subject is entitled to request from the Occupational Pension Provider access to his personal data processed by the Occupational Pension Provider, as well as the rectification, erasure or restriction of processing of such data, and he may also object to processing and exercise his right to data portability.

The data subject may exercise his rights detailed below related to data processing, as well as his right to withdraw his consent, at the Occupational Pension Provider's registered office, in a letter addressed to the insurance company's data protection officer or at the contacts specified in the above Paragraph I, after identification. If the Occupational Pension Provider has a reasonable doubt as to the identity of the natural person who submitted the request, it may request the submission of further information in order to identify the data subject.

The Occupational Pension Provider shall inform the data subject without any undue delay, but no later than within a month of receiving his request, on the measures taken based on his request submitted according to Articles 15-22 of the GDPR. If necessary, considering the complexity of the request and the number of requests, this deadline can be extended by a further two months. The Occupational Pension Provider shall notify the data subject of the extension of the deadline and the reasons for the delay within one month from the receipt of the request. If the data subject has submitted his request electronically, the Occupational Pension Provider will send the notification electronically, unless the data subject requests otherwise.

If the Occupational Pension Provider fails to take action further to the request of the data subject, it shall inform the data subject without delay and at the latest within one month of the receipt of the request on the reasons for not taking action and of the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

The Occupational Pension Provider shall take any measure related to the data subject's exercise of his rights free of charge. Where requests from a data subject are manifestly unfounded or excessive, in particular due to their repetitive nature, the Occupational Pension Provider may, taking into account the administrative costs of providing the information or communication or taking the action requested:

- (a) charge a reasonable fee or
- (b) refuse to act on the request.

1.7.2 Rights of the data subject

Right of access

The data subject shall have the right to obtain, upon his request, confirmation from the Occupational Pension Provider as to whether or not personal data concerning him are being processed. Upon the data subject's request, the Occupational Pension Provider shall provide him with a copy of his personal data being processed by the Occupational Pension Provider, and it shall also provide him with the information specified in Article 15 of the GDPR (such as the purpose of processing, the categories of the personal data being processed, the categories of recipients to which the personal data are disclosed and the period of processing).

Right to rectification

Upon the data subject's request, the Occupational Pension Provider shall rectify any inaccurate personal data concerning him, without undue delay.

Right to erasure and right to be forgotten

In the cases specified in Article 17 of the GDPR, upon the data subject's request and also without a special request, the Occupational Pension Provider shall erase, without any delay, the data subject's data processed by it. If the data subject requests the erasure of his personal data that have been made public by the Occupational Pension Provider, the Occupational Pension Provider shall take all reasonable steps in order to inform the controllers processing the data subject's data that the data subject has requested their erasure.

Right to restriction of processing

Having regard to the provisions of Article 18 of the GDPR, upon the data subject's request, the Occupational Pension Provider shall restrict the processing of the data subject's personal data. Where processing has been restricted based on the data subject's request, the Occupational Pension Provider shall, with the exception of storage, only process the personal data concerned with the data subject's consent, or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest.

Right to data portability

In accordance with Article 20 of the GDPR, in the case of automated processing based on a contract or consent, the Occupational Pension Provider shall – upon the data subject's request – provide to the data subject the personal data concerning him which he has provided to the Occupational Pension Provider, in a structured, commonly used and machine-readable format, or – upon the data subject's request – it shall transmit those data directly to another controller provided that it is technically feasible.

Right to object

Where the Occupational Pension Provider processes the data subject's personal data on the basis of a lawful interest, in the case specified in Article 21 of the GDPR the data subject shall have the right to object, on grounds relating to his particular situation, at any time to the processing of his personal data. In such a case, the controller shall only be allowed to continue the processing of the personal data in exceptional cases specified by law.

1.8. Remedies

The appropriate processing of personal data is of utmost importance to the Occupational Pension Provider. The Occupational Pension Provider shall make every effort to ensure that the processing of personal data takes place lawfully and in the most secure way possible. It would be therefore practical to contact the Occupational Pension

Provider directly with any problems before resorting to other legal remedies, in order to resolve such problems as soon as possible.

The data subject shall have the right to submit a complaint to the Hungarian Authority for Data Protection and Freedom of Information (1055 Budapest, Falk Miksa utca 9-11; www.naih.hu) or to the data protection supervisory authority of the Member State of his habitual residence, place of work or the place of the alleged infringement if the data subject considers that the processing of personal data relating to him infringes the GDPR. The data subject shall have the right to an effective judicial remedy if the supervisory authority does not handle his complaint or does not inform the data subject within three months of the progress or outcome of the complaint. Proceedings against a Supervisory Authority shall be brought before a court of the Member State where the supervisory authority is established.

The data subject may also seek remedy at court. In this case, the data subject may decide whether to bring the proceedings before the courts of the EU Member State competent for the Occupational Pension Provider's place of business or the EU Member State according to the data subject's habitual residence. In Hungary, the data subject may also bring the proceedings before the court competent for his permanent residence or his temporary place of residence.

Allianz Foglalkoztatói Nyugdíjnyújtó Zrt. (Allianz Occupational Pension Provider Co. Ltd.)