Privacy notice

on data processing related to the Card+ Discount Program

Based on Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) 95/46 (General Data Protection Regulation, GDPR), UniCredit Bank Hungary Zrt., as the organiser of the Card+ Discount Program operated by the Bank (hereinafter the "Bank" or "Organiser"), provides this information to you as the Data Subject (hereinafter the "Participant") who is subject to personal data processing in connection with the Card+ Discount Program (hereinafter the "Discount Program").

1   Name of data controller (hereinafter the "Bank"):

UniCredit Bank Hungary Zrt.
Registered office: H-1054 Budapest, Szabadság tér 5-6.
Company reg. No: 01-10-041348
Mailing address: 1242 Budapest, Pf. 386
Email:info@unicreditgroup.hu

2   Data processing activities, purposes

The Organiser and the Service Provider processes the Participants' data for the purposes of the Card+ Discount Program, in the context of which the Service Providers create aggregated segments by processing and aggregating the available data. Based on this, discounted Offers are compiled for segment groups and hence the Participants in it. The Offers only apply to products promoted in the context of the Card+ Discount Program and are only available to Participants through the channels approved in the Terms and conditions for participation in the Card+ Discount Program.

Consequently, Participants' the data are processed during the following data processing activities:
2.1. Joining the Discount Program through mBank
2.2. Ensuring the operation of the Card+ Program of retail mBanking service
2.3. Creating the segment groups in order to provide customised offers
2.4. Performing credit transfers
2.5. Ensuring the use of a partner search function (optional)

To satisfy the above purposes, the Service Provider is entitled to make some or all of the data available to other entities in its target group.

3   Legal basis of the data processing:

For the activities included in sections 2.1. – 2.4., the legal basis for the data processing is perform of the Contract. For the activity included in Section 2.5.: the consent of the Data Subject.

4   Categories of personal data concerned:

The Organiser and the Service Provider process the Participants' personal data according to the provisions of this Policy.

Scope of the data subject to processing:

4.1. The following data are processed in connection with the activity included in Section 2.1: name, client number, mBanking user ID, bankcard/credit card data, client status (active/inactive).

4.2. The following data are processed in connection with the activity included in Section 2.2:

- Discount Program data: status of registration for the programme (active/inactive client, account open/closed)
- Bankcard data: status of bankcard or credit card (active / inactive card)

4.3. The following data are processed in connection with the activity included in Section 2.3:

- Transaction data: transaction channel (ATM, POS or WEB), cash/card transaction, value/transaction amount, transaction date/time, description of transaction, data of card accepter (name, place, country), information on the merchant (name, ID, merchant category code, terminal ID). Transaction history for 1 (one) year prior to the card registration.
- Client data: client ID provided by the Organiser for contact purposes (indirect ID of clients);
- Card data: masked card number, debit/credit card, card status (active/inactive)

4.4. The following data are processed in connection with the activity included in Section 2.4: client ID, transaction data, bankcard/credit card data, data of account affected by the crediting.

4.5. The following data are processed in connection with the activity included in Section 2.5: place of residence.

5   Processing includes profiling

In order to create customised Offers, it is necessary to evaluate the Participants' personal preferences in respect of the purchases made by card. For this purpose, the transaction data of Participants registered in the Discount Program is analysed based on a pre-defined algorithm, including the Transaction Data for the specified period, i.e. 1 (one) year prior to joining the Discount Program.

6   During the data processing, the following have access to the data as the Bank's data processors:

as the Bank's IT service provider:
UniCredit Group S.p.a.
Piazza Gae Aulenti 3 - Tower A
20154 Milano, Italy
Tax number: 00348170101

as the service providers of the Card+ Program:
Dateio s.r.o.
Registered office: Czech Republic, Prague 5, 150 00, Beniškové 1285/7, Košiře,
Company ID number: 02216973

7   Data retention period:

Data are stored at Dateio for 90 days after deregistration from the Card+ Discount Program, at the Bank for 5 years after deregistration.

With respect to data processing, the data subject may request in respect of their personal data:

a) information on the processing of the personal data in accordance with point 4;
b) rectification of the personal data processed;
c) erasure or the restriction of the personal data;
d) in certain cases, they may have the right to data portability; and/or
e) may object to the processing of their personal data.

With regard to the data processing, the data subject has the right to lodge a complaint with the Bank's Data Protection Officer at the contact details specified in section 1 or with the National Authority for Data Protection and Freedom of Information (Registered office: 1055 Budapest, Falk Miksa utca 9-11., postal address: 1363 Budapest, Pf. 9.; phone: +36-1-391-1400; fax: +36-1-391-1410; e-mail: ugyfelszolgalat@naih.hu; https://www.naih.hu) if they consider that there has been or is an imminent threat of a violation of rights in connection with the processing of their personal data. Additionally, the data subject is entitled to turn to the court at their place of their residence or abode for the protection of their rights.