

Effective: 18 January 2021

To ensure secure processing and protection of your personal data is of primary importance to us. To this end we always ensure that we process your data only to such an extent which is required for the execution of any given process or measure, and we will take every technical and organizational measure to prevent unauthorized persons from accessing your data.

This data protection guide will give you all the necessary information on what happens to your data after you provide them to our company.

I. DATA PROCESSOR'S DATA

Your data are processed by Aegon Magyarország Pénztárszolgáltató Zrt., who is the Data Processor in respect of this guide.

- Seat: 1091 Budapest, Üllői út 1.
- Postal address: 1399 Budapest, Pf.: 717.
- Telephone: 06-1-477-4890
- E-mail address: nypugyfel@aegon.hu
- Website: www.aegonnyugdij.hu

II. DATA PROCESSING OFFICER

- Name: dr. Schwanner Orsolya
- Contact information: nyp.adatvedelem@aegon.hu

III. PURPOSE OF AND LEGAL GROUNDS FOR PROCESSING DATA

Data may be collected for a clearly determined, specific purpose (i.e. it is restricted to a purpose), and may only be processed in a manner which is compatible with such purpose.

In order to ensure lawful data processing, the law clearly determines the legal grounds, the existence of which makes data processing possible:

- the stakeholder's consent,
- legal regulations to process a certain data class,
- data processing is required to fulfil a specific contract,
- it is the company's legitimate interest.

PROCESSING THE DATA OF MEMBER ORGANIZERS AND CONTRACTED PARTNERS

Member organizers

The company shall process the identification and contact information of natural person member organizers (hereinafter referred to as member organizer), as well as information necessary to fulfil the contract and information produced relevant to this.

The data of member organizers will be processed for the following purposes:

- to fulfil rights and obligations arising from the permanent agency agreement.
- to enforce live claims as well as civil and criminal claims against the natural person.
- to clear up, manage and prevent fraud.

Legal grounds for data processing:

- data processing required for fulfilling the agreement for intermediaries
- data processing is required to enforce the legitimate interests of the data processor.
- data processing stipulated by legal provisions (Accounting Act).

Recipients of personal data:

- service providers engaged in activities related to keeping the records of contracts, paying commissions, and the clawback of unjustified commission paid.
- authorities entitled to access data in compliance with legal provisions, e.g. the Hungarian National Bank, the National Tax and Customs Administration of Hungary, authorities investigating a case, the public prosecutor's office, and the court.

Data will be processed while the contract is in force and after its termination as long as claim may be enforced with regard to the contractual relationship. Accounting documents must be kept for 8 years in compliance with the law.

Contracted partners

In terms of service partners who are in a contractual relationship with the Pension Fund, the identification data and signature of representatives acting in the course of concluding the agreement as well as the identification data and supplied contact information of designated contact persons and persons taking part in the fulfilment of the contract will be processed by us in connection with performing the terms of the agreement, settlements related to the agreement, and enforcing any civil or criminal claims.

Legal grounds for data processing in case of contact persons and persons taking part in the fulfilment of the contract is the legitimate interest of the data processor relevant to the fulfilment of the agreement (carrying out the contractual tasks, keeping in touch with the persons designated to do so, cooperation).

Data will be processed while the contract is in force and after its termination as long as claim may be enforced with regard to the contractual relationship. Accounting documents must be kept for 8 years in compliance with the law.

SOUND RECORDING⁴

Your conversation with our call centre will be recorded to verify the measures taken, to retrace the content of the statement made, to identify the individual making the statement and the date of such statement, and to protect the rights of the persons taking part in the conversation. Processing data is based on your consent. If you refuse to give your consent to the recording, we will not provide the opportunity to arrange matters over the phone, however, you will have the opportunity to contact the company in mail or e-mail.

Calls conducted with our sales call centre operators will also be recorded. You may discontinue the call any time, if you feel it is unsuitable for you.

Sound recordings will be kept because of the legitimate interest of the company for five years. It is in the interest of the company to prove the content of the calls upon the client's request or in the course of possible public proceedings.

Our state-of-the-art rescue system ensures that the calls are not modified and are protected at an appropriate level.

DATA PROCESSING ON THE WEBSITE

The servers to operate the company's website are provided by Aegon Magyarország Általános Biztosító Zrt. and the servers are operated by Bohl Software Consulting Kft.

Calculators

If you use our pension calculator, we will ask that you give your name, sex, date of birth, telephone number, e-mail address so that we can send you the calculation in an e-mail, or in order for our Call Centre to contact you, if necessary, and help you to conclude the pension fund contract.

You may decide to give the data required for the conclusion of the pension fund contract online (opting online contracting). In this case all the data necessary to conclude the contract must be submitted.

Your data will be transferred to the company's Call Centre in this case, too, and they will contact you over the phone to conclude the contract.

Data processing is based on consent. If you do not consent to it, or you revoke your consent, you may choose others means of joining the pension fund. Data will be processed for one year, and if membership is established earlier, data processing will last until such date.

You may withdraw your consent any time, without restrictions, free of charge.

Cookies

For the appropriate operation of the website it is necessary to place data files called "cookies" on your computer just as other websites and internet service providers do.

What are cookies?

Cookies are small text files which the website places on the computer or mobile device of the user browsing it. Cookies help the website to remember your actions and personal setting for some time such as the username, the language, the font size and other customs settings related to the website's graphic display so it is not needed to specify them again every single time when visiting our website or navigate from one website to the other.

How are cookies used?

The website of Aegon Magyarország Pénztárszolgáltató Zrt. uses cookies to improve user experience. To simplify it, by means of collecting browsing information can we save your settings and user data, make them available during the course of individual working processes, improve our website and send you individual messages with advertisements.

Cookies will be used for the following purposes:

- collecting information required to improve the website and to shaping user needs,
- collecting information on user habits, analysing user habits,
- improving user experience,
- displaying targeted advertisements at subsequent browsing.
- cookies will also be used in a way that in the course of the user's next visit content related to user's former activities will be displayed to the user, settings may be loaded automatically to make the use of the website more comfortable.

It is important that cookies will not be placed at the Operator, but on the user's own device which he/she uses for browsing online content, so the user will have total control over them. When browsing the website with the use of cookies placed on the user's computer the following may be recorded automatically: the starting and finishing time of the user's visit, the IP address, and in some cases, depending on the settings of the user's computer the type and language of the browser, the operation system, the parameters of the user's device, settings made by the user on the website, any subsites visited and time spent on them. The operator shall not and cannot connect these data with personal data, you may decide to share them with us by means of an express authorization and by setting the cookies in your browser.

What type of cookies do we use?

1. Our own cookies and cookies from a third party

We use our on cookies and cookies from third parties on our websites.

Our own cookies are from the aegon.hu domain, and are usually used to identify settings pertaining to language and location, and to display basic website functions.

Cookies from third parties belong to other parties, and are managed by other parties, such as Google or Hotjar's business partners. These cookies might be necessary for certain actions such as to enable advertisements from outside Aegon websites.

2. Cookies for a working process

Cookies for a working process are temporary cookies which remember your activities as long as you remain on the website and they expire when you close your browser. You may need them to complete forms.

3. Permanent cookies

Permanent cookies are for remembering your settings within the website, and they will remain on the computer or the mobile device when you close the browser or restart your computer. We will use these cookies to analyse user activity in order to establish visitor samples, to improve our website's functionality to you or other people visiting it. These cookies make it possible for us to display targeted advertisements to you and to assess the efficiency of our website's functions and advertisements.

How will we use cookies for advertising purposes?

Cookies and advertising technologies, such as data collection marks, pixels and anonymous, advertising network-related labels help us to display relevant advertisements to you more effectively.

They help us to collect aggregate audit data, to carry out research and to make reports to performance advertisers. With the help of pixels we will recognize and improve delivery of advertisements, and also find out when certain advertisements are displayed to you. Because web browsers may request advertisements and data collecting marks directly from the servers of the advertising network, these networks can view, edit or set their own cookies as if you requested a website from their main sites.

Although we do not use cookies on third party websites to create a profile related to the browsing activity, we use aggregate data from third parties in order to display relevant advertisements to you based on your interests. We will not hand over any personal data we collect to the advertising party.

By modifying cookie settings you may unsubscribe from advertisements carried out by informing external and third parties. Unsubscribing will not remove the advertisements from the pages you visited: unsubscribing means that the advertisements displayed will not be aligned to your interests. This means that the advertisements you see will not be aligned to your interest by the cookies with a certain type.

How do we use external cookies (from third parties)?

We hire external suppliers for some of the functions available on our website, e.g. if you visit a page with an embedded video from YouTube or a link points at it. Such videos or links (and other content from external suppliers) may contain cookies of the third party, so it might be useful to study the policy of such third party websites regarding the use of cookies.

How can I decline and delete cookies?

If you want to modify your cookie settings related to the website, or delete them, you can do so in the settings of your browser because cookies are stored on the user's computer and not at the operator of the website. For more information to modify your previous cookie settings visit the help menu in your browser, and you may delete the cookies from the device you use for browsing, which were previously placed by the operator.

For more information on how individual browsers handle cookies visit the following websites:

- Google Chrome
- Firefox
- Microsoft Internet Explorer 11
- Microsoft Internet Explorer 10
- Microsoft Internet Explorer 9
- Microsoft Internet Explorer 8
- Microsoft Edge
- Safari

Maintenance of the cookies

It is possible that you maintain and/or delete cookies as you wish. For more information please visit aboutcookies.org. You can delete all the cookies stored on your computer, and can disable installation thereof in most browsers. If you decide to do so, please be aware that every time you visit a website, you will have to manually perform certain settings, and acknowledge that certain services and functions will not be accessible.

It is easy to accept or decline cookies used by our website, you need to select one of the following two links: [I accept cookies](#) / [I do not accept cookies](#).

PROCESSING DATA FOR DIRECT MARKETING PURPOSES

- In order to increase the number of pension fund contracts the company will collect the data of interested private individuals from external sources, contact these individuals over the phone or in electronic mail to conclude a contract. Data will be processed based on the individual's consent.
- Data required are as follows: name, telephone number, e-mail address, address, date of birth
- Data may come from online registration, telephone contact, personal contact, database taken over from another data processor, public database.
- Consent to data processing is valid for five years, and must be renewed every five years, otherwise it will lapse.
- The consent may be revoked any time within the validity period, in this case you will not get more advertisements from us.

IV. DATA TRANSFER AND DELIVERY TO EXTERNAL PARTIES

Personal data may be accessed primarily by the company's employees and officers who need such data for fulfilling their job, and in some instances data may be transferred to external parties.

The company is entitled to use a data processing company to perform technical activities pertaining to data processing operations.

Recipients of personal data might be as follows:

For member recruiting subcontractors:

- Aegon Hungary Pension Fund
- service providers engaged in activities related to keeping the records of contracts, paying commissions, and the clawback of unjustified commission paid.
- authorities entitled to access data in compliance with legal provisions, e.g. the Hungarian National Bank, the National Tax and Customs Administration of Hungary, authorities investigating a case, the public prosecutor's office, and the court.

For contracted partners:

- service providers engaged in activities related to keeping the records of contracts, paying commissions, and the clawback of unjustified commission paid.
- authorities entitled to access data in compliance with legal provisions, e.g. the Hungarian National Bank, the National Tax and Customs Administration of Hungary, authorities investigating a case, the public prosecutor's office, and the court.

In the event of registration on the website, data processing with the purpose of direct marketing:

- external service providers who perform activities related to the company's activities, where the performance of such activities requires data management or data processing (e.g.: businesses operating IT systems and carrying out certain IT tasks).

V. DATA TRANSFER TO A THIRD COUNTRY OR TO AN INTERNATIONAL ORGANIZATION

Your data will not be transferred.

VI. DATA RETENTION PERIOD

- For member recruiting subcontractors and contracted partners:
Data will be processed while the contract is in force and after its termination as long as claim may be enforced with regard to the contractual relationship. Accounting documents must be kept for eight years in compliance with the law.
- In the event of registration on the website, data processing will last for one year after registration.
- In the event of data processing for direct marketing purposes: data will be processed for five years after the consent is given.

VII. RIGHTS OF THE INDIVIDUAL

1. Access right: It means that you may ask for feedback whether or not data processing is in progress and ask for more details, specifically about the following:

- what is the purpose of data processing
- categories of related personal data
- where did we transfer data to (if outside the EU, what are the guarantees)
- the term of keeping data
- if we did not ask data directly from the Client, what are the sources of such data
- what are the rights of the relevant client
- the fact of automated decision making or profiling, the logic used, and the consequences.

Upon request we will make a copy of your personal data available to you.

2. Correction: If you discover that the personal data on our files are not appropriate (incorrect, incomplete), you may request that they be corrected or completed.

3. Deletion (cancellation): Upon your request we will delete your personal data if:

- they are not needed any longer for the purpose which they were recorded for,
- you withdraw your consent and there is no other legal ground verifying data processing,
- the company processes data out of its own legitimate interests, you object to such data processing, and there is no legal reason having priority over it,
- data are processed against the law,
- the law specifies that they be deleted,
- in the event of using electronic services offered to children.

If we need to delete data pursuant to the above, we will do our best – considering the technology available to us as well as the costs related to execution – in order to make the fact of deletion known to those who received your data, and inform them on the need to delete the links pointing at any personal data and copies thereof.

Deletion have further specific restrictions if data are required to enforce claims or for the purposes of public interest (national health, archiving due to scientific and historical research).

4. Restrictions to data processing: may occur in the following instances

- if you challenge the accuracy of data, and we need time to check it,
- if data processing is against the law, but you specifically ask for restriction instead of deletion,
- data are no longer needed for the purpose of data processing, but you ask them to be kept in order to submit, enforce or protect legal claims,
- if data is processing pursuant to the company's legitimate interest, and you object to data processing, data processing will be restricted until we establish if the company's legitimate interest enjoys priority over your objections.

Restriction means that your data will only be stored, unless you ask for some other measures to be taken as well, or if data are needed to submit, enforce or protect legal claims, or if it is necessitated by the protection of another person's rights or by important public interest.

5. Right of objection

You may use this right if data processing is based on the company's legitimate interest. In such an instance the company is to verify that such legitimate interest is of primary importance and exceeds the client's interest to data protection.

An example is data processing for acquisition purposes. If the client objects to it, we will acknowledge it, and will not contact him/her with our product offers.

6. Portability of data

You may request that we hand over to you electronically the data you made available to us, or we transfer such data to a data manager/data processor specified by you, provided that the necessary technical and data security conditions are given. Your request may refer to data that we process pursuant to your consent, or for the purposes of the fulfilment of the contract, in an automated manner.

7. Right of filing a complaint to the authority

You may contact the National Authority for Data Protection and Freedom of Information against our data processing.

Authority's address: 1055 Budapest, Falk Miksa utca 9-11.

Authority's mailing address: 1363 Budapest, Pf. 9.

Authority's website: www.naih.hu

VIII. AUTOMATED DECISION-MAKING, PROFILING

When making decisions pertaining to data processing purposes as specified above we do not apply automated decision-making.

IX. DATA PROCESSING FOR OTHER PURPOSES

We will not use your data you made available to us for purposes other than the ones specified herein.