

PRIVACY NOTICE

Pursuant to Regulation (EU) 2016/679 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) and based on Act CXII of 2011 on the Right of Informational Self-Determination and the Freedom of Information (Privacy Act), the Company belonging to KÉSZ Group, as Controller, concerned by the report, provides this information to you as subject of the personal data processing related to the whistleblowing system. The data processing under this notice is governed by the Privacy Notice of KÉSZ Holding ZRt. (available at: <https://www.keszgroup.com/adatkezelesi-tajekoztato>), including the measures taken to ensure data security, the rights due in relation to data processing and other issues.

Data of organisation

Name of controller	Company concerned by the report
Address and central contact details of controller	1095 Budapest, Mester u. 87 E-mail: office@kesz.hu
Contact details of controller	Website: www.keszgroup.com
Data Protection Officer	Dr. Orsolya Bálint E-mail: adatvedelem@kesz.hu 1095 Budapest, Mester u. 87.
Contact details	Phone.: +36 70 503 20 87

Purpose of processing and principles of the whistleblowing procedure:

The primary purpose of the notice is to describe the data processing in relation to processes ensuring the behaviours required by the Code of Ethics of KÉSZ Group and in relation to responding to any and all ethical issues and to the investigation of possible breaches of the code of conduct.

All participants in the procedures shall act in accordance with the criteria of objectivity and impartiality and conduct themselves in line with the principles of good faith and fairness. In order to protect the personal data of data subjects involved in cases coming through the whistleblowing system, all documents created or made available during the ethics procedure are confidential.

The Policy of KÉSZ Group on the Handling of Whistleblowing Notifications sets out the duties and responsibilities of the organisational units and persons involved in the whistleblowing processes, including the handling of notifications and the protection of whistleblowers as set out in the chapter on the internal whistleblowing system established by the employer as set out in Act XXV of 2023 on Complaints, Disclosures in the Public Interest, and Related Rules on Reporting Abuses (Whistleblower Protection Act), as well as the rules for responding to ethical issues and investigating cases of breaches of the code of conduct.

In cases reported through the whistleblowing system, all information must be kept confidential.

The purpose, duration and legal basis of processing, the scope of the data processed are summarised in the table below for transparency:

Description and purpose of processing	Legal basis of processing	Scope and source of data processed	Duration of processing
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Operation of a whistleblowing system, investigation and assessment of complaints and notifications, handling of consequences	For companies employing at least 50 persons processing is necessary for the fulfilment of a legal obligation pursuant to Articles 6(1)(c) and 9(2)(g) of the GDPR. The legal obligation is based on Section 18(1) of Act XXV of 2023 on Complaints, Disclosures in the Public Interest, and Related Rules on Reporting Abuses (Whistleblower Protection Act). For companies not employing 50 persons by regular employment contract, processing is based on the legitimate interest of the Controller pursuant to Articles 6(1)(f) and 9(2)(g) of the GDPR.	In case on non-anonymous whistleblowing: Personal data of the whistleblower (name, email address, telephone number) Personal data of the person reported on and of other persons concerned by the report who have relevant information regarding the case (e.g. witnesses) Content of the report, other personal – and sensitive personal – data provided in the description. In case of anonymous whistleblowing: Personal data of the person reported on and of other persons concerned by the report Content of the report, other personal – and sensitive personal – data provided during the description.	If the investigation reveals that the whistleblowing is unfounded or that no further measures are necessary, the personal data relating to the report must be deleted within 60 days of the conclusion of the investigation. If the investigation leads to an action – including measures against the whistleblower or the person concerned by the report aimed at legal proceedings or labour law consequences – the data relating to the report can be stored in the whistleblowing system for a maximum of: 3 years in the case of an employee, pursuant to Section 286(1) of the Labour Code; in other cases, 5 years pursuant to Section 6:22(1) of the Civil Code. If the investigation leads to an action – including measures against the whistleblower or any other person concerned by the report aimed at legal proceedings or labour law consequences – the data relating to the report can be processed in the whistleblowing system no longer than the binding settlement of the proceedings started on the basis of the report.

Data transfer:

Pursuant to Section 6(4) of the Whistleblower Protection Act: Where it has become apparent that the complainant or whistleblower has provided false data or information in bad faith and (a) thereby, indications arise that a criminal

offence or infringement has been committed, the personal data must be transferred to the body or person entitled to conduct proceedings or (b) there are reasonable grounds to assume that unlawful damage or other harm has been caused to another person, the personal data must be transferred upon request to the body or person entitled to start and conduct proceedings.

Recipients of such data transfer may be the courts and authorities involved in the proceedings.

Data processing:

The entity involved in the investigation of the report, i.e. MileStone Gazdasági és Mérnöki Tanácsadó Kft. or the person designated to investigate the notification.

KÉSZ Consulting Kft., as contractual partner of the Controller ensuring the operation of the whistleblowing platform.

Please note that no automated decision-making or profiling takes place.

INFORMATION ON RIGHTS OF THE DATA SUBJECTS

The data subject has the right to obtain from the Controller confirmation as to whether or not personal data concerning him are being processed, and, where applicable, access to the personal data and the information specified in Article 15 of the GDPR:

The data subject has the right to obtain from the Controller without undue delay the rectification of inaccurate personal data concerning him and the right to have incomplete personal data completed (Article 16 of the GDPR).

The data subject has the right, upon request and without undue delay, to obtain the erasure of personal data concerning him by the Controller if any of the grounds listed in Article 17 of the GDPR applies, e.g. where the personal data are no longer necessary for the purposes for which they were collected (right to erasure).

The data subject has the right to obtain, upon request, the restriction of processing by the Controller if one of the conditions listed in Article 18 of the GDPR is met, for example if the data subject has objected to processing, for the duration of the Controller's investigation.

The data subject has the right to object at any time, on grounds relating to his particular situation to the processing of his personal data. In such cases, the Controller shall no longer process the personal data unless the Controller demonstrates compelling legitimate grounds for the processing which override data subject interests, rights and freedoms or relate to the establishment, exercise or defence of legal claims (Article 21 of the GDPR).

The data subject has the right to withdraw his consent at any time (Article 7(3) of the GDPR). The withdrawal of consent does not affect the legitimacy of any processing that was conducted based on the consent prior to withdrawal (right to withdraw consent).

Without prejudice to any other administrative or judicial remedy, every data subject shall have the right to lodge a complaint with a supervisory authority, if the data subject considers that the processing of personal data relating to them violates the GDPR (Article 77 of the GDPR). The data subject may enforce this right before a supervisory authority in the Member State of their habitual residence, place of work or place of the alleged infringement.

In accordance with the provisions of the GDPR, the data subject may request information about the processing of their personal data, request the rectification, erasure or restriction of the processing of their personal data, and object to the processing of personal data. The data subject also has the right to data portability and the right to judicial remedy. The data subject may contact the Data Protection Officer of KÉSZ Group with any observations, questions or problems at adatvedelem@kesz.hu or the Hungarian National Authority for Data Protection and Freedom of Information (H-1055 Budapest, Falk Miksa utca 9-11; ugyfelszolgalat@naih.hu), or can bring the case before the court.

In case of doubt or dispute regarding the interpretation of the Regulations, the Hungarian text shall prevail.