

INFORMATION

on the Whistleblowing Scheme of OFFI Ltd.

In compliance with the provisions of Act XXV of 2023 on complaints, disclosures in public interest, and related rules on reporting abuses (hereinafter referred to as the Complaints Act), the Hungarian Office for Translation and Attestation Private Company Limited by Shares (hereinafter referred to as OFFI) has devised and operates a whistleblowing scheme.

This leaflet provides information on the operation of the whistleblowing scheme, on the reporting of an abuse and the whistleblowing procedure.

1. **The report**

The whistleblowing scheme allows the reporting of illegal or allegedly illegal acts, omissions or other abuse relating to the operation of OFFI.

2. **The following persons are entitled to report under OFFI's whistleblowing scheme:**

- current and former employees of OFFI;
- current and former trainees at OFFI;
- a person intending to establish employment with OFFI and who has started the procedure for the establishment of such a relationship or whose contractual relationship has ended;
- a self-employed person or an individual firm in a contractual relationship with OFFI,
 - a contractor, subcontractor, supplier or person under the supervision and control of an agent currently or formerly in a contractual relationship with OFFI,

3. **Manner of reporting**

Reporting may be made in writing (on paper or electronically) or verbally (in person or by phone).

> **Written reporting**

Written reports may be sent by post to OFFI Ltd.'s headquarters (1062 Budapest, Bajza u. 52.) in an envelope marked "Whistleblowing", or handed over personally to the Chief Legal Counsel at OFFI Ltd. headquarters at a pre-arranged time. Reports may also be sent electronically to the bejelentes@offi.hu e-mail address.

> **Oral reporting**

Dr. Katalin Nemes, the company's Chief Legal Counsel, may be contacted in person at OFFI's headquarters (1062 Budapest, Bajza u. 52.) at a pre-arranged time or by phone by calling 06 1 428 9688 on workdays.

4. Receiving the report

- > In the case of a written report, the recipient will send an acknowledgement of the receipt to the whistleblower within seven (7) days of the receipt of the report. The acknowledgement shall provide the whistleblower with general information on the procedural and data management rules related to the notification.
- > The recipient records the report made orally, by telephone in writing and provides the whistleblower with a copy of the report, while ensuring the possibility to check, correct and sign it approvingly.
- > The recipient of the report made by the whistleblower in person,
 - having been informed of personal data protection provisions, records the report in a permanent and retrievable form; or
 - records the report in writing and provides the whistleblower with a copy of the report, while ensuring the possibility to check, correct and sign it approvingly.

A full and accurate record of the oral report must be made in writing.

In the case of an oral report, the recipient of the report draws the attention of the whistleblower to the consequences of reporting in bad faith, to the procedural rules governing the investigation of the report and that his or her identity remains confidential at all stages of the investigation, provided that he or she provides the information necessary for its establishment.

5. Ignoring the investigation of the report

The company's Abuse Investigation Commission (hereinafter "the Commission") will examine the report.

The investigation of the report may be omitted if:

- a) the report was made by an unidentified person,
- b) the report was not made by the person authorised to do so,
- c) the report is a report repeated by the same whistleblower with the same content as a previous report, and/or
- d) the harm to the public interest or to an overriding private interest would be disproportionate to the restriction of the rights of the natural or legal person (hereinafter together referred to as the "person concerned") resulting from the investigation of the report

6. Duration of the investigation of the report

The Commission will investigate the report in its merits within 30 days. The administrative deadline may be extended once by 8 days, or by 30 days in exceptional cases, if the circumstances of the investigation so justify and if this does not jeopardise the effective conduct of the investigation. The whistleblower must be informed of the extension, its expected date and its reasons. The time limit for examining the report and informing the whistleblower may not exceed three (3) months in the case of an extension either.

7. Investigation of the report

The person concerned must be informed in detail about the report, his or her rights regarding the protection of his or her personal data and the rules on the processing of his or her data when the investigation is commenced.

In accordance with the requirement of a fair procedure, it should be ensured that the person concerned may express his or her views on the report through his or her legal representative and that he or she can provide evidence in support of those views. Exceptionally, in duly justified cases, the person concerned may be informed at a later stage if immediate information would prevent the investigation of the report.

8. Information to the whistleblower

The Commission informs the whistleblower in writing of the investigation or its omission and of the reasons for such omission, the outcome of the examination of the report, and the measures taken or planned.

If the investigation concludes that the report is unfounded or that no further action is necessary, it closes the procedure and informs the whistleblower accordingly.

The written information may be omitted if the whistleblower is informed verbally of the above and takes note thereof.

For information on data processing under the whistleblowing scheme, please consult the whistleblowing scheme privacy policy

Budapest, December 2023

Hungarian Office for Translation and Attestation Ltd.

Whistleblowing Scheme Privacy Policy

Pursuant to Act XXV of 2023 on complaints, disclosures in public interest, and related rules on reporting abuses, the data of persons who have reported abuse in the whistleblowing scheme of the Hungarian Office for Translation and Attestation Ltd. (hereinafter referred to as OFFI) are controlled by OFFI in line with the following.

I. CONTROLLER

	Controller
Name:	Hungarian Office for Translation and Attestation Ltd. (OFFI Ltd.)
Seat:	1062 Budapest Bajza utca 52.
Postal address:	1394 Budapest, Pf. 359.
Telephone:	+36-1-428-9600
Website:	www.offi.hu
Email:	bejelentés@offi.hu
Data Protection Officer:	Zoltán Tózsér

II. LEGISLATION GOVERNING DATA PROCESSING

- Act XXV of 2023 on the rules on reporting abuse.
- Act CXII of 2011 on the right to informational self-determination and on the freedom of information (hereinafter: Privacy Act);
- 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 (hereinafter referred to as the General Data Protection Regulation or GDPR)

III . LEGAL BASIS FOR DATA HANDLING

1. OFFI processes the data of the whistleblower and the person concerned by the reporting (hereinafter the whistleblower individually referred to as: the whistleblower, while the whistleblower and the person concerned by the reporting collectively referred to as: the data subject) pursuant to Sections 18 to 29 and Sections 41 to 49 of the Complaints Act.
2. If the person concerned voluntarily provides his/her personal data, the data will be processed by OFFI pursuant to Article 6(1)a) of the General Data Protection Regulation (hereinafter: GDPR) and, in order to fulfil the legal obligation imposed on OFFI in connection with the investigation of the report under the Complaints Act (Section 2.1), pursuant to Article 6(1)c) of the GDPR.

IV SCOPE OF THE PROCESSED DATA

1. The Controller requests the whistleblower to refrain from sending data not necessary for the investigation of the report and not related to the provisions of Section 20 (1) of the Complaints Act.
2. Data processing in case of the reporting is made by an **employee** (Section 20(2) of the Complaints Act)

Data group	Personal data	The purpose of data processing
Name		data necessary to identify the whistleblower

Contact information	Name, e-mail address, telephone number	data necessary to contact the whistleblower
Data contained in the report	information about an unlawful or suspectedly unlawful act or omission or other abuse.	examination of the report
Data on employment		examination of the report

3. Data processing in the case of a notification made by the **Business Partner** (Section 20(3) of the Complaints Act)

Data group	Personal data	The purpose of data processing
Name, position		data necessary to identify the whistleblower
Name of the organisation	Data concerning an entity other than a natural person as per Section 20(3) of the Complaints Act	data necessary to identify the whistleblower or to examine the report
Contact information	Postal address, e-mail address, telephone number (if any)	data necessary to contact the whistleblower
Data contained in the report	information about an unlawful or suspectedly unlawful act or omission or other abuse.	examination of the report
Data on Business Partners	Data as per Section 20(3) of the Complaints Act	examination of the report

V. PERSONS ENTITLED TO DATA PROCESSING

The data contained in the report shall only be processed

- a) by OFFI's designated Abuse Investigation Commission;
- b) by a person employed by OFFI who is requested by the designated department of OFFI to conduct the investigation, taking into account the principle of proportionality of data processing;

by applying the provisions governing the protection of the whistleblower in the Complaints Act. Data transfer is governed by the provisions of Point VII.

VI. DURATION OF DATA PROCESSING

- 1.** The data contained in the report will be kept by OFFI for 5 years after the end of the investigation, after which it will be deleted.
- 2.** Data of reports whose retention is justified by the fulfilment of OFFI's legal obligation, legal proceedings or employer action: in this case, the data will be processed until the fulfilment of the legal obligation, the final conclusion of the proceedings or the end of the retention period provided therefor.

VII DATA TRANSFER

- 1.** The data contained in the report will not be transferred by OFFI to any organisation or person other than OFFI, with the exception of the following:
 - a) the investigation of the report necessitates the initiation of criminal proceedings;
 - b) during the monitoring procedure of the employment supervisory authority pursuant to Section 29(1) of the Complaints Act;
 - c) if the investigation of the report requires the involvement of an external organisation, and
 - (ca) the external organisation is entitled to process the data under the law;
 - (cb) if point (ca) does not prevail, the whistleblower has consented to the transfer of his or her data;
 - d) Information regarding a person concerned, who is not an OFFI staff member or which is a legal person or organisation other than OFFI, may be transferred to the competent department or staff member of another organisation entitled to act. (Section 6(3) of the Complaints Act)

2. The legal basis of data transfer is the performance of a legal obligation pursuant to Article 6(1)(c) of the GDPR in the cases under VII.1, and the consent of the data subject pursuant to Article 6(1)(a) of the GDPR in the case of VII.1(cb).

VIII THE TRANSFER OF DATA OF THE WHISTLEBLOWER ACTING IN BAD FAITH

1. If it has become clear to OFFI that the whistleblower has communicated false data or information in bad faith and
 - a) there are indications that a criminal offence or an infraction has been committed, the personal data of the whistleblower must be transmitted to the authority or person entitled to conduct the procedure,
 - b) there are reasonable grounds for believing that he or she has caused unlawful damage or other injury to another party, his or her personal data must be disclosed at the request of the authority or person entitled to initiate or conduct the proceedings.
2. In the case under VIII.1, the legal basis for the transfer of data is Section 6(4) of the Complaints Act and Article 6(1)(c) of the GDPR as an obligation imposed on OFFI.
3. The whistleblower is not considered to be acting in bad faith if:
 - the whistleblower has made the report through one of the whistleblowing schemes under the rules set out in the Complaints Act,
 - the whistleblower has obtained the reported information regarding the circumstances concerned in the context of his or her work-related activities, and
 - the whistleblower had reasonable grounds for believing that the reported information regarding the circumstances concerned was true at the time of reporting.

IX THE RIGHTS OF THE DATA SUBJECT WITH REGARD TO DATA PROCESSING

1. Right to request information

The data subject may request information from the Controller in writing.

At the request of the data subject, the Controller shall provide information on the data processed by the Controller, the purpose, legal basis and duration of the processing, the activities related to the processing, the name and contact details of the data protection officer, and the persons who receive or received the personal data of the person concerned and for what purposes. The Controller provides the information in writing in a comprehensible form within the shortest possible time from the date of the request, but not later than 25 days. The information is provided free of charge if the person requesting the information has not yet submitted a request for information to the Controller in the current year in the same field. In other cases, the Data Controller may set a fee.

2. Modification or deletion of data

The data subject may request the modification or deletion of his/her data recorded in the system at any time, except for data processing required by law. At the request of the data subject, personal data will be permanently deleted from the system and cannot be restored afterwards.

The Controller deletes the personal data:

- if its processing is unlawful;
- if the data subject requests it;
- if the purpose of the processing has ceased;
- if the specified period of data storage has expired;
- if it has been ordered by a court or the National Authority for Data Protection and Freedom of Information (hereinafter: "the Authority") ordered.

The Controller notifies the data subject of the rectification and erasure, as well as all those to whom the data were previously transmitted for processing. It shall not give such notification if, having regard to the purposes of the processing, it does not harm the legitimate interests of the data subject. The deletion of data does not include the destruction of documents generated in the subject area.

3. Objection

The data subject may object in writing to the processing of his or her personal data if

- it is necessary for the performance of a task carried out solely in the public interest or in the exercise of official authority vested in the controller, or in the pursuit of the legitimate interests of OFFI or a third party, except where the processing is required by law;
- the data are used or transmitted for direct marketing or scientific research purposes;
- in other cases, specified by law.

OFFI examines the objection within the shortest possible time from the date of the request, but no later than 15 days, and informs the data subject in writing of the outcome. If the objection is justified, OFFI will terminate the processing, including further collection and transfer, block the data, and notify all those to whom the personal data concerned by the objection were previously disclosed of the objection and the measures on the basis thereof, and who are obliged to take measures to enforce the right of objection.

4. Right to restriction of processing

In order to enforce the right to restriction of processing, OFFI restricts processing to the processing operations defined in the Privacy Act,

- a) if the data subject contests the accuracy, correctness or completeness of the personal data processed by OFFI and the accuracy, correctness or completeness of the personal data processed cannot be established beyond reasonable doubt, for the period of time necessary to resolve the doubt;
- b) if the data should be erased in the event of unlawful processing, but there are reasonable grounds to consider, on the basis of a written declaration by the data subject or on the basis of information available to OFFI, that the erasure of the data would harm the legitimate interests of the person concerned, for the duration of the legitimate interest justifying the non-deletion.

5. Limitations on the right to information in whistleblowing procedures

If the public interest disclosure pertains to a natural person, the personal data of the whistleblower will not be disclosed by OFFI to the person requesting the information in exercising the right to information and access according to the provisions on the protection of personal data accruing to this natural person. (Section 6(5) of the Complaints Act)

X. SECURITY OF PERSONAL DATA

Method of data storage, the security of data processing:

The Controller takes all technical and organisational measures

- a) that are necessary to ensure that the application(s) operate(s) in accordance with the IT Security Policy (ISP);
- b) to ensure that authorised users have access to the application's functions and data according to their level of authorisation;
- c) to ensure that this data is saved and archived.

The Controller must comply with the procedural rules necessary to enforce the requirements of the law on data protection. The Controller is obliged to check the uploaded files to viruses and apply other security filters.

The Controller must ensure the security of data processing by technical, organisational and institutional measures to provide a level of protection adequate to the risks associated with the processing, by choosing the IT tools used and by operating them in such a way that the data processed are:

- a) accessible to authorised persons (availability);
- b) authentic and authenticated (authenticity of processing);
- c) verifiably unchanged (data integrity);
- d) accessible only to the authorised person and protected against unauthorised access (data confidentiality).

XI. ACCESS TO LEGAL REMEDY AND OTHER INFORMATION

The data subject may have recourse to the courts (the Regional Court with territorial jurisdiction) if he or she considers that OFFI is processing his or her personal data in breach of the provisions on the processing of personal data laid down by law or by a binding legal act of the European Union.

In order to enforce his or her rights, the data subject may

- a) initiate an investigation at the Authority (<http://www.naih.hu>) to examine whether OFFI's action was lawful, whether the controller restricts the exercise of the rights of the person concerned under the Privacy Act or rejects his/her request to exercise those rights, and
- b) request the Authority to initiate an authority procedure for data protection if he or she considers that, in processing his or her personal data, OFFI is in breach of the provisions on the processing of personal data laid down by law or by a legally binding act of the European Union.

You can lodge a complaint with the National Authority for Data Protection and Freedom of Information:

Name: National Authority for Data Protection and Freedom of Information
Address/ Postal address: 1055 Budapest, Falk Miksa u. 9-11., 1363 Budapest, Pf. 9.
Telephone: (+36-1) 391-1400
Fax: (+36-1) 391-1410
E-mail: ugyfelszolgalat@naih.hu

Budapest, December 2023

Hungarian Office for Translation and Attestation Ltd.
