

## **Eurobond International Limited Liability Company**

### **INTERNAL WHISTLEBLOWING POLICY**

Name and type of policy:	Internal Whistleblowing Policy
Date of entry into force:	6 October 2023
Prepared by:	Legal Director
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## 1. PURPOSE

The purpose of this Internal Whistleblowing Policy (the **Policy**) is to ensure that **EuroBond International Insurance Intermediary Limited Liability Company** (registered office: 1126 Budapest, Tartsay Vilmos utca 14, company registration number: Cg. 01-09-191522, Budapest Metropolitan Court of Justice, tax number: 24956053-2-43) (the **Company**), as a company subject to Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (Money Laundering Act), ensure compliance with the provisions of Act XXV of 2023 on Complaints, Notifications of Public Interest and Rules for Reporting Abuses (**Complaints Act**).

The Policy allows persons covered by the Policy to report to the Company in confidence, without fear of retaliation, if they become aware of or have reasonable grounds to suspect a violation of the law. To ensure these purposes, this Policy sets out the requirements for the use of the internal whistleblowing system, the procedure for reporting abuse, and the details of the investigation of a report.

## 2. DEFINITIONS

Concept	Definition
Internal Whistleblowing System	A system operated by the Company whereby persons covered by this Policy may report any act or omission that they have reasonable grounds to believe may be in breach of the law.
Report	Providing information to a designated person about an unlawful or suspected unlawful act or omission or other misconduct through the Internal Whistleblowing System.
Whistleblower	A person subject to this Policy who reports an unlawful or suspected unlawful act or omission or other misconduct through the Company's Internal Whistleblowing System.
Person concerned	The natural or legal person concerned by the Report.
Person with substantive information on the subject matter of the Report	A person who has substantial information about an unlawful or suspected unlawful act or omission or other misconduct reported through the Internal Whistleblowing System.
Employer	Any person who employs a natural person in the context of an employment relationship, i.e. for the purposes of this Policy the Company.
Employee	A natural person who performs an activity for and under the direction of the Company within the framework of an employment relationship for consideration or who performs an activity for his/her account.
Employment relationship	Any legal relationship in which the Employee performs an activity for and under the direction of the Company for remuneration or self-employment.

Legislation	All legislation applicable in Hungary and directly applicable European Union acts.
Designated person	The impartial person or department responsible for the operation of the Internal Whistleblowing System in the Company.
Retaliation	A direct or indirect act or omission occurring in a work-related context, which is triggered by a Report, and which may cause unjustified prejudice to the Whistleblower, such as, in particular, but not limited to, the cases listed in Article 41 (2) of the Complaints Act.
Infringement or misconduct	Breach or non-compliance with the law by act or omission.

### 3. SCOPE

#### 3.1. Personal scope

The following persons may report to the Internal Whistleblowing System:

- a) the Employee,
- b) an Employee whose employment with the Company has been terminated,
- c) a person who wishes to establish an employment relationship with the Company and for whom the procedure for establishing such a relationship has been initiated,
- d) an individual entrepreneur, a sole proprietor or a sole proprietorship having a contractual relationship with the Company,
- e) a person who holds an ownership interest in the Company and a person who is a member of the Company's administrative, management or supervisory body, including a non-executive director,
- f) any contractor, subcontractor, supplier or person under the supervision and control of a Company who has initiated a procedure for establishing a contractual relationship with the Company, or who is or has been in a contractual relationship with the Company,
- g) trainees and volunteers working for the Company,
- h) a person who wishes to enter into a legal or contractual relationship with the Company under points (d), (e) or (f) and in respect of whom the procedure for the establishment of such legal or contractual relationship has been commenced, and
- i) a person who has ceased to have a legal or contractual relationship with the Company under (d), (e) or (f).

#### 3.2. Material scope

This Policy applies to all Reports of unlawful or suspected unlawful acts or omissions or other misconduct made by a Whistleblower in the internal whistleblowing system.

### 4. INTERNAL WHISTLEBLOWING SYSTEM

The Company has an internal whistleblowing system through which persons covered by this Policy may report suspected or actual violations of the law. Through the Internal Abuse Reporting System, a report may be made in writing or orally through the following channels:

- a) by writing to [wbs@eurobondint.com](mailto:wbs@eurobondint.com),
- b) orally at +36 30 280 6608 and in person (1126 Budapest, Tartsay Vilmos utca 14.) at a pre-arranged time.

The Legal Director is the Designated Person for the operation of the Internal Whistleblowing System and the investigation of the Reports at the Company, and the Back Office Manager also has access to the system for replacement purposes.

## **5. INTERNAL REPORTING PROCEDURE**



### **5.1. Making a Report**

The Whistleblower shall make its Report in good faith. For the purposes of this Policy, a good faith Report means that the Whistleblower had reasonable grounds to believe that the information about the reported violations was true at the time of the Report and reasonable grounds to believe that the Report was necessary.

The Whistleblower shall provide the Designated Person with the most accurate and complete information possible to enable the Designated Person to ascertain the truth of the breach of rules or obligations to which the Report relates, investigate the Report, and, if necessary, take action.

The Company encourages the Whistleblower to identify himself/herself in order to better investigate the Report and to fully protect the Whistleblower. The Company also allows anonymous reporting but draws the attention of the Whistleblower to the fact that the Complaints Act also allows the Company to refrain from investigating Whistleblower Reports made by an unidentified Whistleblower.

In the case of an oral Report, the Designated Person shall, before making the Report (and by providing this Policy), draw the attention of the Whistleblower to the consequences of making a Report in bad faith, and to the procedural rules governing the investigation of the Report and to the fact that his or her identity, if he or she provides the information necessary to establish it, will be treated confidentially at all stages of the investigation.

### **5.2. Recording and confirming the Report**

The Designated Person shall, within 7 (seven) days of making the oral Report, make a full and accurate record of the oral Report using the model set out in Annex 1 to the Policy and shall ensure that the Whistleblower verifies, corrects and accepts the contents of the record by signing it. The Designated Person shall provide the Whistleblower with a copy of the written Report.

Within 7 (seven) days of receipt of the written Report, the Designated Person shall send a confirmation e-mail to the Whistleblower's e-mail address with the information text as set out in Annex 2 to this Policy.

### **5.3. Preliminary examination of the Report**

Upon receipt of a Report, the Designated Person will conduct a preliminary investigation to determine:

- a) What does the Report cover?
- b) Who are the persons concerned by the Report, persons with material information about the matters contained in the Report?
- c) When did the breach occur or when is it likely to occur?

- d) Where did or will the event take place?
- e) Why did or will the event happen?
- f) What is the scale and impact of the event?
- g) What evidence is available?

The Designated Person is entitled not to investigate a Report in the following cases:

- a) the Report was made by an unidentified Whistleblower,
- b) the Report was not made by a v subject to the Policy,
- c) the same Report is made by the same Whistleblower, repeatedly, with the same content as the previous Report; or
- d) the harm to the public interest or an overriding private interest would not be proportionate to the restriction of the rights of the Person concerned resulting from the investigation of the Report.

#### **5.4. Investigation of the Report**

The Designated Person shall investigate the allegations in the Report as soon as circumstances permit, but no later than thirty (30) days from the date of receipt of the Report. This time limit may be extended in particularly duly justified cases. At the same time, the Whistleblower shall be informed of the extension, the reasons for it and the expected date of the investigation. The time limit for investigating the Report and informing the Whistleblower shall not exceed 3 (three) months in the event of an extension.

In conducting the investigation, the Designated Person shall in confidence, comply with the provisions of 6.7. of the Policy and shall protect the identity of the Whistleblower and the identity of the Person concerned by the Report.

The Designated Person will investigate the Report with the protection of the Whistleblower and the Person concerned in mind and will always seek to prove whether or not an infringement has occurred. In the course of the investigation, the Designated Person shall ensure that the person subject to the Report expresses his or her views on the matter and provides evidence to support his or her allegations.

To respect the confidentiality of the proceedings, only the Designated Person or the person invited by the Designated Person to assist in the investigation of the Report may contact persons with material information about the facts contained in the Report, the Whistleblower or the persons concerned by the Report.

During the investigation of the Report, the Designated Person will keep in contact with the Whistleblower and may invite the Whistleblower to complete or clarify the Report, to clarify the facts and to provide additional information.

In the course of investigating the Report, the Designated Person will assess the accuracy of the circumstances set out in the Report and must take appropriate measures to remedy the abuse.

If the Report justifies the initiation of criminal proceedings, the Designated Person will arrange the submission of a police report.

#### **5.5. Closing the investigation**

The Designated Person shall inform the Whistleblower in writing of the investigation of the Report, its outcome and the action taken or planned. The written information may be omitted

if the Designated Person has provided this information orally to the Whistleblower and the Whistleblower has taken note of the information.

## **6. THE PROTECTION OF WHISTLEBLOWERS**

### **6.1. Prohibition of retaliation**

The Company will ensure that the Whistleblower will not be subject to any action adverse to the Whistleblower which is taken as a result of the lawful making of the Report and which is taken in connection with a legal or contractual relationship involving a breach or misconduct. The retaliation is considered unlawful under the provisions of the Complaints Act, even if it would otherwise be lawful.

In administrative or judicial proceedings relating to an adverse action taken against the Whistleblower, if the Whistleblower proves that the Report is lawful.

- a) the adverse action must be presumed to have been taken because the Report was lawfully made, and
- b) the person who took the adverse action has the burden of proving that the adverse action was taken for a legitimate reason and not because the report was lawfully made.

### **6.2. Exemption from confidentiality**

The Whistleblower is not liable for the disclosure of a protected secret if he or she has lawful knowledge of it and discloses it unlawfully in order to make the Report.

### **6.3. Immunity from liability in case of infringement**

In order to make a lawful report, the Whistleblower may, except in the case of a criminal offence, commit a breach of the rules which allows the circumstances to which the Report relates to be discovered and for which he/she is not liable.

### **6.4. Exemption from liability in the event of a lawful Report**

The Whistleblower shall not be liable for obtaining or accessing the information contained in a lawful Report, unless the Whistleblower has committed a criminal offence by obtaining or accessing the information. A Whistleblower shall not be held liable for lawfully making a Report if the Report was necessary to disclose the circumstances to which the Report relates.

### **6.5. Legal assistance**

The Designated Person shall, at the start of the investigation, inform the Person concerned in detail about the Report, his or her rights regarding the protection of his or her personal data and the rules applicable to the processing of his or her data by providing this Policy.

### **6.6. Prohibition of waiver**

No declaration, contract or regulation limiting or excluding the rights of Whistleblowers may be lawfully relied on in any administrative or judicial proceedings.

### **6.7. Confidentiality**

The Internal Whistleblowing System operated by the Company ensures that the personal data of the Whistleblower who discloses his or her identity and of the Person concerned by the Report cannot be disclosed to anyone other than the authorized persons.

The person investigating the Report may, pending the conclusion of the investigation or the initiation of formal charges as a result of the investigation, share information about the content of the Report and the Person concerned in addition to informing the Person concerned, with other departments or employees of the Company to the extent strictly necessary for the conduct of the investigation.

In accordance with the requirement of a fair hearing, the Designated Person shall ensure that the Person concerned by the Report also expresses his or her views on the Report through his or her legal representative and that these views are supported by evidence. Exceptionally, and in duly justified cases, the Person concerned may be informed at a later stage if immediate information would impede the investigation of the Report.

The present 6.7. shall also apply mutatis mutandis to any person who may have access to the material information contained in the Report.

## **7. DATA PROTECTION**

The Company shall act in accordance with the data protection legislation in force at the time, the provisions of the Complaints Act and the Company's internal regulations in the context of the processing of data in connection with the Internal Whistleblowing System, in particular with regard to the provisions set out in this Policy. The Company's Privacy Notice on the processing of data in connection with the operation of the Internal Whistleblowing System (**Privacy Notice**) is set out in Annex 3 of the Policy. In the event of any discrepancy between the Company's Data Management Policy and the Policy, including the Annexes thereto, the provisions of the Policy shall apply.

## **8. FINAL PROVISIONS**

When the Policy enters into force, the Company will publish the Policy on its website. In the event of any amendment to the Policy, the Company shall replace the Policy published on its website with the amended Policy.

The Policy shall enter into force on the date indicated on the cover page. The Policy shall be reviewed annually by the Board of Directors and subsequently adopted by the Board of Directors.

**Minutes  
- of the oral Report -**

I, the undersigned, ....., the designated person of **EuroBond International Insurance Intermediary Limited Liability Company** (registered office: 1126 Budapest, Tartsay Vilmos utca 14, company registration number: Cg. 01-09-191522, Budapest Metropolitan Court of Justice, tax number: 24956053-2-43), responsible for the operation of the internal whistleblowing system established under Act XXV of 2023 on Complaints, Notifications of Public Interest and Rules for Reporting Abuses (**Complaints Act**), hereby record the following oral report made on ..... as follows:

Name of the Whistleblower: .....  
Date of Report: ..... year, .....month .....day .....hour  
Way of the report: By phone/in person\*  
The names of the persons concerned by the Report: .....

Content of the Report:

Under Paragraphs (4) and (6) of Article 21 of the Complaints Act, I have informed the Whistleblower by providing the Internal Whistleblowing Policy, of the following:

- a) the data protection rules relating to the making and investigation of a Report,
- b) the consequences of reporting in bad faith,
- c) the procedural rules governing the examination of the Report and that
- d) the identity of the Whistleblower is kept confidential by the Company at all stages of the investigation.

Dated: ....., .....

\_\_\_\_\_  
Designated person

\* Underline as appropriate

I, the undersigned ....., as the person who filed a report with **EuroBond International Insurance Intermediary Limited Liability Company** (registered office: 1126 Budapest, Tartsay Vilmos utca 14, company registration number: Cg. 01-09-191522, Budapest Metropolitan Court of Justice, tax number: 24956053-2-43), through the internal whistleblowing system established under the Complaints Act, declare that I have been given the opportunity to verify and correct the present minutes and I agree with its content. I have received, understood and acknowledge the above information provided by the designated person. I have received a copy of the written Report on the undersigned date.

Dated: ....., .....

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Whistleblower

## 2. Annex

Dear Whistleblower!

I, the undersigned, ....., as the Designated person to operate the Internal Whistleblowing System of **EuroBond International Insurance Intermediary Limited Liability Company** (registered office: 1126 Budapest, Tartsay Vilmos utca 14, company registration number: Cg. 01-09-191522, Budapest Metropolitan Court of Justice, tax number: 24956053-2-43) (the **Company**), in accordance with the provisions of Act XXV of 2023 on Complaints, Notifications of Public Interest and Rules for Reporting Abuses (**Complaints Act**) hereby inform you that your written Report submitted on ..... has been received and recorded by the Company. Please examine the Company's Internal Whistleblowing Policy, which is available on the Company's website at the following link: <https://eurobondint.com/downloads/whistleblowing-en.pdf> (English language version) <https://eurobondint.com/downloads/whistleblowing-hu.pdf> (Hungarian language version) (the **Policy**), and the rules on the processing of your data in this context, which are set out in Annex 3 to the Policy.

Thank you for your contribution!

## Privacy notice

### 1. PURPOSE

**EuroBond International Insurance Intermediary Limited Liability Company** (registered office: 1126 Budapest, Tartsay Vilmos utca 14, company registration number: Cg. 01-09-191522, Budapest Metropolitan Court of Justice, tax number: 24956053-2-43 phone number: +36 1 225 0038, website: www.eurobondint.com) (the **Company**) operates an Internal Whistleblowing System under its obligation under Act XXV of 2023 on Complaints, Notifications of Public Interest and Rules for Reporting Abuse (**Complaints Act**).

In operating the Internal Abuse Reporting System, the Company shall process personal data in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and 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) No 95/46/EC (**GDPR**), Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (**Infotv.**), the Complaints Act and other relevant legislation.

In accordance with Articles 13 and 14 of the GDPR, the Company provides the following clear and detailed information (**Privacy Notice**) in relation to the processing of personal data processed by the Company in connection with the operation of the Internal Whistleblowing System.

### 2. DEFINITIONS

Terms not defined in this Privacy Notice shall have the meanings given to them in the GDPR, the Complaints Act and the Company's Internal Whistleblowing Policy (the **Policy**).

### 3. PERSONS CONCERNED BY THE PROCESSING OF DATA THROUGH THE OPERATION OF THE WHISTLEBLOWING SYSTEM

The Company may process personal data of the following persons in the context of the operation of the Internal Whistleblowing System:

- a) Whistleblower,
- b) Person concerned by the Report, or
- c) Person with substantive information on the subject matter of the Report

(The Whistleblower, the Person concerned by the Report and the person with material information about the Report's subject matter are collectively referred to as the **Data Subjects** for the purposes of this Privacy Notice).

### 4. CONTACT DETAILS FOR CHANGES TO THE PRIVACY NOTICE

The Company will inform Data Subjects of any changes to the Privacy Notice through its website.

## **5. PURPOSE OF THE PROCESSING AND SCOPE OF THE DATA PROCESSED**

The Company processes the following data of the Whistleblower for the purposes of sending confirmation of the submission of the Report, maintaining contact with the Whistleblower, remedying any deficiencies in the Report, informing the Whistleblower of the investigation, registering the Report, investigating the Report, remedying or terminating the conduct that is the subject of the Report, if necessary, make a denunciation, and verifying the adequacy of the Company's actions:

- a) the data provided by the Whistleblower concerning his/her identity;
- b) the contact details provided by the Whistleblower;
- c) the content of the Report and the data concerning the Whistleblower provided in the Report;
- d) the signature of the Whistleblower, if the Report is made in writing and signed;
- e) the record of the recording of the Report, other written documentation;
- f) the result of an investigation carried out by the Company;
- g) a denunciation by the Company, if the investigation reveals that a denunciation is necessary in relation to the Report.

The Whistleblower may choose to make the Report anonymously. In this case, the Company is entitled to refrain from investigating the Report pursuant to Section 22 (6) a) of the Complaints Act.

The Company processes the following data of the Person concerned by the Report for the purposes of investigating the Report, remedying or terminating the conduct that is the subject of the Report, if necessary, making a denunciation and verifying the adequacy of the Company's actions:

- a) the identity data of the Person concerned by the Report, provided by the Whistleblower in the Report or brought to the attention of the Company as a result of the investigation, which are strictly necessary for the investigation of the Report;
- b) any other data concerning the Person concerned by the Report, provided by the Whistleblower in the Report or brought to the attention of the Company as a result of the investigation, which are strictly necessary for the investigation of the Report, the remedying or cessation of the conduct which is the subject of the Report or, if necessary, the initiation of official proceedings.

## **6. LEGAL BASIS FOR PROCESSING PERSONAL DATA**

During the operation of the Internal Whistleblowing System and the investigation of the Reports, the legal basis for the processing by the Company of the personal data referred to in point 5 which have come to the knowledge of the Company are as follows:

- a) until the investigation of the Report has been completed, the fulfillment of the legal obligation imposed on the Company by Chapter II of the Complaints Act;
- b) the investigation of the Report or the initiation of official or criminal proceedings as a result of the investigation, has a legitimate interest in being able to demonstrate, in the event of any dispute or control, the adequacy of its conduct, i.e., inter alia, that it has properly fulfilled its obligations under the Complaints Act, once the investigation has been completed.

## **7. DURATION OF THE PROCESSING OF PERSONAL DATA**

The Company may process personal data detailed in Point 5 which it has come to know through the operation of the Internal Whistleblowing System and the investigation of Reports for a period of 5 (five) years from the date of the investigation of the Report or, if the investigation has resulted in the initiation of official or criminal proceedings, from the conclusion of such proceedings.

## **8. RECIPIENTS AND CATEGORIES OF RECIPIENTS OF PERSONAL DATA**

### **8.1 DATA TRANSFER**

#### **8.1.1 Transmission of data for the purpose of initiating an official procedure**

- a) If the Company has grounds to initiate official or criminal proceedings based on the Report, the Company will disclose the personal data identified in the Report or which come to the Company's knowledge during the investigation of the Report to the authority conducting the proceedings. The Company is entitled to disclose the personal data of the Whistleblower to the authority conducting the proceedings if (i) the Whistleblower has given its express written consent to the disclosure of its personal data, or (ii) the authority conducting the proceedings has the appropriate authority to process the personal data of the Whistleblower.
- b) If it has been established that the Whistleblower has communicated false data or information in bad faith and
  - i. this gives rise to circumstances indicating that a criminal offense or irregularity has been committed, the Company will disclose the personal data of the Whistleblower to the body or person entitled to conduct the proceedings,
  - ii. there are reasonable grounds to believe that you have caused unlawful damage or other legal harm to another person, the Company will disclose the personal data of the Whistleblower to the body or person entitled to initiate or conduct the proceedings, upon request.

## **9. RIGHTS OF DATA SUBJECTS, EXERCISE OF DATA SUBJECT RIGHTS AND RESTRICTIONS**

Data Subjects may request from the Company access to, rectification, erasure or restriction of processing of personal data concerning them, object to the processing of such personal data and exercise their right to data portability, in accordance with Articles 15-22 of the GDPR.

Requests from Data Subjects regarding the exercise of their data subject rights should be addressed to the Company at the above address indicated in Point 1 or by presenting them there.

The Company will exercise the rights of the Data Subject free of charge. If the Data Subject's request is manifestly unfounded or excessive, in particular because of its repetitive nature, the Company may, taking into account the administrative costs of providing the information or information requested or of taking the action requested, (i) charge a reasonable fee or (ii) refuse to act on the request.

If the Company has reasonable doubts about the identity of the natural person submitting the request, it may request additional information necessary to identify the Data Subject

in order to comply with data security requirements and to protect the rights of Data Subjects.

## **9.1 DEADLINE**

The Company will comply with the Data Subject's request to exercise his/her rights in relation to data processing within a maximum of 1 (one) month from the date of receipt of the request and will respond within this period even if it does not comply. The date of receipt of the request shall not count towards the time limit.

If necessary, the Company may, taking into account the complexity of the request and the number of requests, extend this deadline by an additional 2 (two) months. The Company shall inform the Data Subject who submitted the request of the extension of the deadline within 1 (one) month of receipt of the request, stating the reasons for the delay.

The Company will notify the Data Subject who submitted the request to the contact details provided by the Data Subject.

## **9.2 RIGHTS CONCERNED**

### **9.2.1 The right of access**

The Data Subject has the right to obtain information from the Company as to whether or not his or her personal data are being processed and, if such processing is taking place, the right to be informed that:

- a) what personal data is processed by the Company;
- b) on what legal basis;
- c) for what purpose;
- d) how long it will be processed;
- e) to whom, when, under what law, to which personal data were access given or to whom the Company have transferred the personal data;
- f) the source of your personal data, and;
- g) whether it uses automated decision-making and, if so, its logic, including profiling.

The Company will provide the Data Subject with a copy of the personal data subject to processing free of charge for the first time upon the Data Subject's request, and may charge a reasonable fee based on administrative costs thereafter.

### **9.2.2 The right to rectification**

The Data Subject may request the Company to amend inaccurate personal data processed by the Company.

### **9.2.3 Right to blocking (restriction of processing)**

The Data Subject may request that the Company restricts the processing of his or her personal data (by clearly indicating the limited nature of the processing and ensuring that it is kept separate from other data) where.

- a) disputes the accuracy of his/her personal data (in which case the Company will limit the processing for the period of time it takes to verify the accuracy of the personal data);

- b) the processing is unlawful and the Data Subject opposes the erasure of the data and requests instead the restriction of their use;
- c) the Company no longer needs the personal data for the purposes of processing, but the Data Subject requires them for the establishment, exercise or defence of legal claims; or
- d) the Data Subject has objected to the processing (in which case the restriction applies for the period until it is established whether the Company's legitimate grounds prevail over the Data Subject's legitimate grounds).

#### 9.2.4 The right to protest

The Data Subject may object to the processing if he or she considers that the Company would not process his or her personal data properly in the context of the purpose stated in this Privacy Notice. In such a case, the Company must demonstrate compelling legitimate grounds for processing the personal data which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims.

#### 9.2.5 The right to erasure

The Company will delete the personal data without delay at Data Subject's request in the cases specified in Article 17 of the GDPR. If the Data Subject requests the erasure of his or her personal data disclosed by the Company, the Company shall take all reasonable steps to inform the data processors that process the Data Subject's data that the Data Subject has requested the erasure of his or her data.

#### 9.2.6 The right to data portability

At the Data Subject's request, the Company will provide the Data Subject with the relevant personal data previously provided by the Data Subject to the Company in a structured, commonly used, machine-readable format, which the Data Subject is entitled to transmit to another data processor or, at the Data Subject's request, the Company will, if technically feasible, transmit such data directly to another data processor.

### 9.3 RESTRICTION OF THE RIGHTS OF THE DATA SUBJECT

#### 9.3.1 Restrictions on the Notified Person's right to information

If informing the Person concerned immediately would prevent the investigation of the Report, the Company will provide the information specified in Article 14 of the GDPR to the Person concerned at a later date, at a time that does not jeopardize the successful investigation of the Report on the basis of the authorization given by Article 23 of the GDPR and Article 27 (2) paragraph 2 of the Complaints Act.

#### 9.3.2 Limitation of the Notified Person's right of access

In exercising its right of access, the Company will not disclose to the Notified Person the Notified Person's personal data pursuant to the authorisation granted by Article 23 of the GDPR and the obligation under Article 26(4) of the Complaints Act.

### 9.4 RIGHT TO LEGAL REDRESS

If the Data Subject considers that the Company has violated the applicable data protection requirements in the processing of his/her personal data, he/she may lodge a complaint with the National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa utca 9-11., postal address: 1363 Budapest, PO Box 9., e-mail:

ugyfelszolgalat@naih.hu, website: [www.naih.hu](http://www.naih.hu)), or he/she may take the matter to court, which will rule on the matter out of turn, in order to protect his/her data. In such a case, the Data Subject is free to decide whether to bring an action before the competent court of law in the place of residence (permanent address) or the place of stay (temporary address) or the place where the Company has its registered office. You can find the court of the place of residence or domicile at <https://birosag.hu/ugyfelkapcsolatiportal/birosag-kereso>. The Metropolitan Court of Budapest has jurisdiction over the lawsuit according to the place where the Company is domiciled.