

## PROCESSING GUIDE FOR VISUAL EUROPE GROUP ON WHISTLEBLOWERS AND INDIVIDUALS CONCERNED BY WHISTLEBLOWING

Please be informed that the Visual Europe Group handles personal data related to the reporting of abuse in accordance with the provisions of this guide. The Employer's organizational unit designated to handle reports is operated by the Visual Europe Group's HR Department. The internal whistleblowing system is designed by the Visual Europe Group in such a way that the personal data of the whistleblower who reveals his identity, as well as of the person concerned by the report, cannot be known by anyone other than those authorized to do so. Members of the Visual Europe Group:

### **1. Visual Europe Zártkörűen Működő Részvénytársaság**

Registered seat: 3000 Hatvan, Gábor Áron utca 22.

### **2. Visual Europe Production Korlátolt Felelősségű Társaság**

Registered seat: 3000 Hatvan, Gábor Áron utca 22.

### **3. Visual Europe Project Korlátolt Felelősségű Társaság**

Registered seat: 3000 Hatvan, Gábor Áron utca 22.

Controller: Visual Europe Group (Registered seat: 3000 Hatvan, Gábor Áron utca 22.; Company registration number: 10-10-020321; VAT number: 25319721-2-10; "Controller").

The entity does not have a data protection officer; thus, the HR Department may be contacted for data protection matters. E-mail: [adatvedelem@veggroup.hu](mailto:adatvedelem@veggroup.hu), Phone: +36 70 375 9768

The purpose of processing: The personal data specified in this guide are processed by the Controller for the purpose of investigating the report of abuse reported by you and for remedying or eliminating the conduct that is the subject of the report.

The legal basis for processing is Article 6 (1) c) of the Regulation, meaning that processing is necessary to fulfil the legal obligations applicable to the controller under Act No XXV of 2023 on complaints, reports of public interest and rules relating to the reporting of abuse (hereinafter: "Complaints Act").

Data subjects concerned by the processing:

- the whistleblower,
- the person whose conduct or omission gave rise to the report (the person concerned by the report),
- the person who may have relevant information about the contents of the report (e.g. witness, expert),
- persons participating or involved in the investigation of the report based on the relevant internal regulations.

If it becomes apparent that the Controller has acquired personal data not belonging to this scope, the Controller shall erase them immediately.

If it becomes further apparent that the whistleblower has provided false data or information in bad faith and a suspicion on the commission of a crime or violation of the law arises, the Controller shall hand over the personal data of the whistleblower that acted in bad faith, to the person entitled to conduct a procedure. If it is reasonable to assume

that the whistleblower acting in bad faith has unlawfully caused damage or otherwise violated the rights of others, the Controller shall hand over his personal data upon request to the person entitled to conduct a procedure.

Where the report concerns a natural person, in exercising his or her right of information and access under the provisions on the protection of personal data, the personal data of the reporter shall not be disclosed to the person requesting the information.

Until the investigation is closed or formal charges are initiated as a result of the investigation, the persons investigating the report may, in addition to informing the person concerned, share information about the content of the report and the person concerned with other departments or staff of the Controller to the extent strictly necessary for the investigation.

In accordance with the requirement of a fair procedure, the Controller shall make possible for the person involved in the report to express his position regarding the report through his legal representative and to support it with evidences.

Recipients of personal data (transfer): the Controller may transfer personal data to the following recipients, or allow access in order to receive data:

- the entity participating in the investigation of the report,
- the body authorized to conduct an initiated procedure (based on the law or with the consent of the whistleblower).

Data transfers outside the EU: data processed under the internal whistleblowing system may only be transferred to a third country or an international organisation if the recipient of the transfer has given a legal commitment to comply with the rules on whistleblowing set out in the Complaints Act and subject to the rules on the protection of personal data.

Additional information pursuant to Article 13 (2) of 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 (“Regulation”).

(i) Period of storage of personal data:

Personal data not required for the investigation will be erased immediately by the Controller.

The Controller shall erase the personal data from the investigation documentation immediately after completion of the investigation, but no later than within 30 days, if no further proceedings have been initiated based on the investigation.

If proceedings are initiated on the basis of the report, the Controller shall keep the report and the personal data provided in the report for 3 years, or until punishability lapses if the report relates to a criminal offence.

(ii) Information about your rights concerning processing: You, as the owner of personal data managed by the Controller, may request from the Controller (a) access to your personal data, (b) their rectification, (c) erasure of data in the cases and exceptions specified in Article 17 of the Regulation or (d) restriction of the processing of data, and (e) may object to the processing of personal data, and (f) are entitled to the right of data portability with regard to data processed automatically and in the course of processing based on your consent or a contract.

(iii) Right to submit a complaint to a supervisory authority: You can submit a complaint regarding the processing of your personal data to the competent supervisory authority:

Name of Supervisory Authority: National Data Protection and Freedom of Information Authority

Address: 1055 Budapest, Falk Miksa utca 9-11.

Phone number: +36/1-391-1400

(iv) Profiling and decision-making based on automated processing: The Controller does not make a decision based solely on automated data management, including profiling, the scope of which would extend to you or which would have legal effects for you.

Personal data of data subjects processed in connection with the report

The absolutely necessary personal data that arise in connection with the report and its investigation, in particular: the unique registration number of the report; data related to the report (facts, time and method of reporting, identification data and contact details of the whistleblower according to the Complaints Act); the status of the whistleblower as per section 20 (2) of the Complaints Act; a list of the data, substantive decisions and measures taken regarding the person concerned by the report as allowed by the Complaints Act.

*I, the undersigned*

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*declare that I have read the above guide and I have taken note of the information regarding the processing of my personal data.*

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*Data provider/Data subject*