DATA POLICY INFORMATION
on the operation of an internal whistleblowing system

The Act No XXV of 2023 on public interest notifications and rules relating to the notification of abuse (the "Complaints Act") provides that an employer who employs at least 50 persons under an employment relationship is required to establish an internal abuse reporting system (hereinafter referred to as the "System").

Transcend, as the data controller (hereinafter referred to as the " Controller") informs data subjects about the processing of their data in connection with the operation of the System in accordance with the provisions 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) REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (hereinafter referred to as "GDPR").

This Notice uses the terms defined in the GDPR and the Complaints Act

'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person

'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction

'controller' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law

'processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller

'notifier' means the person who makes a notification

'employer' means a person who employs a natural person under an employment relationship

1. **Controller shall be**

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Represented by: Valéria Juhász
No DPO was appointed at the controller.

2. The purposes and legal basis of the processing, the data processed and the data subjects concerned

To the extent necessary for the performance of its tasks in relation to the operation of the whistleblowing system, the controller processes the data of the whistleblower or of the person whose conduct or omission gave rise to the Report, and of the person who may have information relevant to the investigation of the Report

Purpose of the processing:
To carry out the tasks related to the operation of the internal whistleblowing system in accordance with the Complaints Act

Data subject:
- the notifier,
- the person whose conduct or omission gave rise to the notification,
- the person who may have information of substance concerning the facts complained of

The scope of the data processed:

The fact of the notification, personal data essential for its investigation.

Legal basis for processing:
The legal basis for the processing is Article 6(1)(c) GDPR, as the processing is a legal obligation of the Controller and § 26 of the Complaints Act.

3. Duration of data processing

Personal data not necessary for the purposes of the investigation will be deleted by the controller without delay.

The controller shall, after the investigation has been completed, if no further action has been taken on the basis of the investigation, delete the personal data from the investigation file without undue delay, but within a maximum of 30 days after the investigation is completed.

4. Recipients of personal data, recipients in third countries

Managers and officers of the controller, including authorised officials, employees and other persons involved in the performance of their duties (hereinafter collectively referred to as "contributors") have access to your personal data.

The personal data contained in the notification may only be known by the controller or its agents to the extent that access to such data is necessary for the performance of their tasks.

The processor of the controller is the hosting service provider who contributes to the storage of the electronic data such as: Gloster Digital Services Kft.

As a rule, the Controller does not transfer data to third countries or international organisations, unless standard contractual clauses for the transfer of personal data from the Community to third countries was signed by the parties.

5. Technical and organisational measures taken to ensure the security of data processing

When determining the method of processing and during processing, the Controller shall use appropriate technical and organisational measures to ensure the effective implementation of the principles of data protection, the requirements of the law, to protect the rights of data subjects and to ensure that only personal data that are necessary for the specific purpose of the processing.

To this end, the Controller shall implement appropriate legal, administrative, physical and IT security measures
The Controller guarantees that, under the confidentiality obligation, intermediaries who have access to personal data are subject to a data protection obligation.

he following IT security solutions are in place at the Controller to ensure the security of the data: virus protection, firewall, password protection.

6. Rights of data subjects

The individual of the personal data process shall be entitled to seek information on processing his/her personal data and may ask the rectification, erasure or restriction of the personal data by a declaration, to be sent to the above contact details of the controller. Upon the request of the individual the controller shall provide information on the personal data processed, their source, the purpose, legal basis, duration of the data process, the name, address and activities to be performed by the data processor, if any, in a clearly intelligible form, within the shortest possible time upon submission of the request, but within one month, at the latest (unless shorter period is provided by any other law).

The controller shall rectify the personal data if it is inaccurate and the controller has the accurate data and restricts if it is requested by the individual or if based on the information on hand, the erasure may be assumed to violate the data subjects' legitimate interests. The restricted personal data shall be processed as long as there is the data process purpose excluding the erasure of the personal data, thereafter, it shall be deleted. The controller shall mark the personal data if its correctness and accuracy is disputed by the data subject, however, the inaccuracy or incorrectness of the personal data cannot be unambiguously defined, and it will be erased in case of unlawful data process, if it is requested by the data subject or the processed personal data is incomplete or inaccurate – and this cannot be remedied lawfully – provided that the act does not exclude erasure, the purpose of the data process was terminated or the legally defined deadline of the data storage lapsed, or court or NAIH ordered the erasure.

The data controller shall have one month to erase, restrict or rectify the personal data, and if such request is not performed by the controller, the data subject shall be informed within one month in writing, by stating the reasons for denial. The controller shall also inform the data subject on the rectification, restriction, marking and deletion of the personal data. No information will be given, if – considering the purpose of the data process – the legitimate interest of the data subject is not jeopardised.

The data subject may object to processing his/her personal data. In this case, the data controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. The objection shall be reviewed by the Controller within the shortest possible time upon the receipt of the request, but within one month at the most, and shall decide on the feasibility and the individual shall be informed thereof. If, according to the Controller the objection of the data subject is well founded, the data process – including further data process – shall be terminated and the data shall be blocked. If the data subject does not agree with the decision, he/she shall seek judicial remedy.

Contact details of the National Authority for Data Protection and Freedom of Information:
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- address. 1055 Budapest, Falk Miksa utca 9-11
- telephone: +36 (1) 391-1400
- fax: +36 (1) 391-1410
- e-mail: ugyfelszolgalat@naih.hu
- web: www.naih.hu

Irrespective of the right to lodge a complaint, the data subject may also take legal action against the unlawful processing of his or her personal data or against the unlawful processing of personal data rights relating to informational self-determination.

If the data subject has his or her habitual residence in another Member State of the European Union, the proceedings may be brought the court of the Member State of habitual residence.

Budapest, April 08, 2026.