

## Privacy Notice

The independent Data Controllers listed below, pursuant to Articles 13 and 14 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 ("General Data Protection Regulation" or "GDPR"), hereby provide the following information regarding the processing of personal data of individuals making a report, or other Data Subjects ("Data Subject") named or mentioned in such reports, submitted via the "Mondd el!" (Tell us!) system operated by Magyar Telekom Plc. or through any other whistleblowing system operated by the Data Controllers for the purpose of reporting suspected misconduct.

### 1. DATA CONTROLLERS (INDEPENDENT) COMPANY NAMES AND CONTACT DETAILS

Magyar Telekom Nyrt. (registered office: 1097 Budapest, Könyves Kálmán krt. 36.; registration no.: 01-10-041928; tax no.: 10773381-2-44)

Telekom Rendszerintegráció Zrt. (registered office: 1097 Budapest, Könyves Kálmán krt. 36.; registration no.: 01-10-044852; tax no.: 12928099-2-44)

Magyar Telekom Mobile Infra Zrt. (registered office: 1097 Budapest, Könyves Kálmán krt. 36.; registration no.: 01-10-143383; tax no.: 32875986-2-43)

Telekom New Media Szolgáltató Zrt. (registered office: 1097 Budapest, Könyves Kálmán krt. 36.; registration no.: 01-10-046367; tax no.: 14745199-2-43)

Kalásznét Kft. (registered office: 1097 Budapest, Könyves Kálmán krt. 36.; registration no.: Cg. 01-09-997095; tax no.: 12324969-2-43)

VGreen Kft. (registered office: 9024 Győr, Orgona utca 10.; registration no.: 08 09 034273; tax no.: 27783942208)

(hereinafter collectively referred to as: "Data Controllers")

### 2. DATA PROTECTION OFFICER CONTACT DETAILS

address: 1097 Budapest, Könyves Kálmán krt. 36.; email: [DPO@telekom.hu](mailto:DPO@telekom.hu)

### 3. PURPOSE OF THE INTENDED PROCESSING OF PERSONAL DATA, THE LEGAL BASIS FOR PROCESSING, THE CATEGORIES OF PERSONAL DATA CONCERNED, AND THE DURATION OF DATA PROCESSING OR THE CRITERIA FOR DETERMINING SUCH PERIOD:

Purpose of Processing	Legal Basis for processing	Scope of personal data processed	Duration of processing or the criteria for determining the period
Operation of a system for the reporting of suspected misconduct involving the	Legal obligation to which the Data Controller is subject pursuant to Article 6(1)(c) of	<ul style="list-style-type: none"><li>Personal data relating to the whistleblower (name, e-mail address, phone number).</li></ul>	<ul style="list-style-type: none"><li>The Data Controller shall delete personal data, in view of the establishment, exercise, or defense</li></ul>

Purpose of Processing	Legal Basis for processing	Scope of personal data processed	Duration of processing or the criteria for determining the period
employees, subcontractors, agents, and other contractual partners of the Data Controllers.	<p>the General Data Protection Regulation.</p> <p>Section 18(1) of Act CLXV of 2023 on Complaints, Public Interest Disclosures, and Rules Related to the Reporting of Misconduct.</p>	<p>The whistleblower may choose to remain anonymous; however, in a data protection sense, this does not constitute anonymity, as they are identified within the system by a unique technical identifier, but the Data Controller shall not become aware of their identity.</p> <ul style="list-style-type: none"> <li>• Further information provided by the whistleblower in the report regarding themselves.</li> <li>• Personal data provided by the whistleblower concerning the reported person and in connection with the reported misconduct.</li> <li>• Personal data relating to other third parties mentioned in the report (e.g., identification data, contact details, their role in or knowledge of misconduct, etc.).</li> </ul>	<p>of legal claims, no later than 5 years after the conclusion of the investigation.</p> <ul style="list-style-type: none"> <li>• Clearly unfounded reports shall be deleted by the Data Controller as soon as possible, but no later than within 2 business days.</li> <li>• Reports that are not investigated based on a substantive assessment shall be deleted by the Data Controller within 30 days.</li> </ul>

The Data Controller requests the whistleblower to provide only such personal data within the information supplied in the report as are necessary for the investigation of the misconduct in question.

4. In order to ensure the success of the investigation into the contents of the report, in certain cases concerning third-party Data Subjects about whose acts or omissions the whistleblower alleges or suspects misconduct, or about whom information is otherwise provided, separate information shall be provided only at a later stage but within a reasonable time (e.g., during an investigative interview, in the minutes/records, or via e-mail). This general notice also applies to such cases and data subjects.

5. AUTOMATED DECISION-MAKING (INCLUDING PROFILING):

No automated decision-making, including profiling, takes place during the data processing.

## 6. TRANSFER OF PERSONAL DATA, RECIPIENTS OF PERSONAL DATA, AND CATEGORIES OF RECIPIENTS:

The Data Controllers utilize the following data processor in connection with the data processing:

- If the Data Controller is not Magyar Telekom Plc., Magyar Telekom Plc. shall act as a data processor for the other independent Data Controllers.
- Whispli, a *société par actions simplifiée à associé unique*, registration number (Paris Trade and Companies Register): 853 011 278 00019; address: 10 rue de la Paix, 75002 Paris, France. Its activity related to data processing: recording received reports and providing the Data Controller with access to them. In the case of anonymous reports, it transfers data to the Data Controller using only a technical identifier.
- Sub-processors utilized by Whispli: Amazon Web Services (52 rue du port, 92000, Nanterre, France), Google (8 Rue de Londres 75009 Paris, France), Zendesk (266 Place Ernest Granier, 34000 Montpellier, France), Dobbytec OÜ (Usetiful) (Sepapaja tn 6 15551 Tallinn Estonia), iSope (Espace Reine 90-92 Route de la Reine Boulogne-Billancourt 92100 France), Twilio (24 Rue Cambacérès, 75008 Paris).

The data processor utilized by the Data Controller uses sub-processors headquartered outside the European Union; however, these sub-processors utilize European infrastructure.

## 7. RIGHTS OF DATA SUBJECTS IN RELATION TO DATA PROCESSING:

The Data Subject shall have the following rights in relation to the processing of their data:

- a) right of access to the personal data relating to them;
- b) right to rectification of their personal data;
- c) right to erasure (right to be forgotten) or restriction of processing of their personal data, with the exception of mandatory data processing;
- d) right to data portability, provided that the conditions set out in the applicable laws are met; and
- e) right to object, where the processing is based on legitimate interest.

### 7.1. Right of Access

The data subject shall have the right to obtain from the Controller confirmation as to whether or not personal data concerning them are being processed, and, where that is the case, access to the personal data. The Controller shall provide a copy of the personal data undergoing processing to the Data Subject. For any further copies requested by the Data Subject, the Controller may charge a reasonable fee based on administrative costs. Where the Data Subject makes the request by electronic means, the information shall be provided in a commonly used electronic format, unless otherwise requested by the Data Subject.

### 7.2. Right to Rectification

260325-1

The Data Subject shall have the right to obtain from the Controller without undue delay the rectification of inaccurate personal data concerning them.

### 7.3. Right to Erasure ("Right to be Forgotten")

The Data Subject shall have the right to obtain from the Controller the erasure of personal data concerning them without undue delay, and the Controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2) of the General Data Protection Regulation, and where there is no other legal ground for the processing;
- c) the Data Subject objects to the processing pursuant to Article 21(1) of the General Data Protection Regulation and there are no overriding legitimate grounds for the processing, or the Data Subject objects to the processing pursuant to Article 21(2) of the General Data Protection Regulation;
- d) the personal data have been unlawfully processed;
- e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Controller is subject;
- f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the General Data Protection Regulation (conditions applicable to child's consent).

### 7.4. Right to Restriction of Processing

The Data Subject shall have the right to obtain from the Controller restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the Controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise, or defense of legal claims; or
- d) the data subject has objected to processing pursuant to Article 21(1) of the General Data Protection Regulation; in this case, the restriction applies for a period pending the verification whether the legitimate grounds of the Controller override those of the data subject.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the Data Subject's consent or for the establishment, exercise, or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

### 7.5. Right to Data Portability

The Data Subject shall have the right to receive the personal data concerning them, which they have provided to the Controller, in a structured, commonly used, and machine-readable format and have the right to transmit those data to another controller without hindrance from the Controller to which the personal data have been provided, where: (i) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) of the General Data Protection Regulation, or on a contract pursuant to point (b) of Article 6(1) of the General Data Protection Regulation; and (ii) the processing is carried out by automated means.

#### 7.6. Right to Object

The Data Subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning them which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. In such a case, the 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 defense of legal claims.

Where personal data are processed for direct marketing purposes, the Data Subject shall have the right to object at any time to processing of personal data concerning them for such marketing, which includes profiling to the extent that it is related to such direct marketing. If the Data Subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

#### 7.7. General Rules for the Exercise of Rights by the Data Subject

The Controller shall provide information to the Data Subject on action taken on a request without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The Controller shall inform the Data Subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the Data Subject makes the request by electronic form, the information shall be provided by electronic means where possible, unless otherwise requested by the Data Subject.

The Controller shall provide the information and take action free of charge. Where requests from a Data Subject are manifestly unfounded or excessive, in particular because of their repetitive character, the Controller may, taking into account the administrative costs of providing the information or communication or taking the action requested:

- a) charge a reasonable fee, or
- b) refuse to act on the request.

The Controller shall bear the burden of demonstrating the manifestly unfounded or excessive character of the request.

Where the Controller has reasonable doubts concerning the identity of the natural person making the request, the Controller may request the provision of additional information necessary to confirm the identity of the Data Subject.

### 8. LEGAL REMEDIES AND ENFORCEMENT:

The Data Subject may at any time contact the Data Protection Officer of the Controller regarding the processing of their personal data (address: 1097 Budapest, Könyves Kálmán krt. 36.; e-mail: DPO@telekom.hu).

In the event of a complaint regarding the processing of personal data, the Data Subject may also contact the National Authority for Data Protection and Freedom of Information (postal address: 1363 Budapest, Pf. 9.; address: 1055 Budapest, Falk Miksa utca 9-11.; Phone: +36 (1) 391-1400; Fax: +36 (1) 391-1410; E-mail: ugyfelszolgalat@naih.hu; website: www.naih.hu).

In the event of an infringement of their rights, the Data Subject may bring a legal action against the Controller before a court. The court shall adjudicate the case in an expedited procedure. The Controller shall bear the burden of proof that the processing complies with the provisions of the law. Competence for the case lies with the Regional Court (*törvényszék*), and in the capital, the Metropolitan Court of Budapest (*Fővárosi Törvényszék*). The action may also be brought before the Regional Court having jurisdiction over the Data Subject's place of residence or stay.

The Controller shall be liable to compensate any damage caused to others by unlawful processing of the Data Subject's data or by a breach of data security requirements. The Controller shall be exempt from liability if it proves that the damage was caused by an unavoidable cause outside the scope of the processing. No compensation shall be payable to the extent that the damage resulted from the intentional or grossly negligent conduct of the injured party.

Dated: Budapest, March 25, 2026