

## Privacy notice whistleblowing of abuse

We hereby inform you (hereinafter referred to as "**Data Subject**", "**you**") of the personal data we process about you in connection with your whistleblowing of abuse (hereinafter referred to as "Whistleblowing") at DIGIC PICTURES Kft. This Privacy Notice also sets out your rights.

### 1. Identity and contact details of the data controller

Company name: DIGIC PICTURES Kft. (hereinafter referred to as "**DIGIC PICTURES**" or "**Data Controller**")

Head office: H-1031, Záhony utca 7. Hz. ép. Budapest Hungary

Company registration number: 01-09-693165

Tax number: 12573383-2-41

Website: <https://digicgroup.com>

E-mail: [visszaeles@digicpictures.com](mailto:visszaeles@digicpictures.com)

### 2. THE SCOPE OF THE DATA CONCERNED, THE PURPOSE OF THE PROCESSING, THE LEGAL BASIS AND THE RETENTION PERIOD

THE SCOPE OF THE DATA PROCESSED	PURPOSE OF PROCESSING	LEGAL BASIS FOR PROCESSING	DURATION OF DATA STORAGE
Declarant's name, telephone number, email/postal address The persons listed in paragraphs (2) and (3) of Article 20 of Act XXV of 2023 on Complaints, Notifications of Public Interest and Rules on Reporting Abuses (" <b>Complaints Act</b> ") may be the Reporting Party as the Data Subject.	Conducting an investigation to report information about an unlawful or suspected unlawful act or omission or other abuse.	GDPR <sup>1</sup> Article 6(1)(c): fulfilment of a legal obligation: the Complaints Act	<ul style="list-style-type: none"> <li>• Until the end of the 5th year after the end of the investigation of the notification</li> <li>• In the case of criminal or administrative proceedings, until the end of the 5th year after the proceedings have been concluded</li> </ul>

### 3. Collection of data

Personal data is collected from the Data Subject and may be collected during the investigation of the notification.

### 4. The following persons are entitled to access the personal data and the

<sup>1</sup> 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 (GDPR)

## information contained in the Notification

Personal data may be accessed by the competent staff of the Data Controller to the extent necessary for the performance of their tasks.

4.1. The following persons are also entitled to have access to the information contained in the Notification, if necessary for the purposes of the case:

4.2.

- Managing Director of DIGIC PICTURES Kft.;
- CEO
- the designated member(s) of the IT Division;
- a designated member(s) of the Legal Division;
- a designated member(s) of the HR Division.

## 5. Exercise of rights of access

### 5.1. The right of access

The Data Subject has the right to obtain, at any time, pursuant to Article 15 of the GDPR, information on whether and how his or her personal data are processed by DIGIC PICTURES, including the purposes of the processing, the recipients to whom the data have been disclosed or the source from which the data were obtained by DIGIC PICTURES, the retention period, any rights in relation to the processing and, in the case of transfers to third countries or international organisations, information on the safeguards relating thereto.

### 5.2. Right to erasure ("right to be forgotten")

Pursuant to Article 17 of the GDPR, if you request the deletion of any or all of your personal data, DIGIC PICTURES will delete it without undue delay:

- if they are no longer necessary for the purpose for which they were originally stored or if the processing is unlawful,
- if you exercise your right to object and there are no overriding compelling legitimate grounds for the processing.

Personal data may not be deleted if the processing is necessary:

- a) to exercise the right to freedom of expression and information;
- b) to comply with an obligation under Union or Member State law that requires the controller to process personal data;
- c) to bring, enforce or defend legal claims.

### 5.3. Right to restriction of processing

You may request restriction of the processing of your personal data on the basis of Article 18 of the GDPR in the following cases:

- the processing is unlawful, but you oppose the erasure of the data and instead request the restriction of their use;
- DIGIC PICTURES no longer needs the personal data for the purposes of processing, but you require them for the establishment, exercise or defence of legal claims.

### 5.4. The right to protest

Under Article 21 of the GDPR, where the legal basis for processing concerning you is the

legitimate interest of DIGIC PICTURES or a third party, you have the right to object to the processing. DIGIC PICTURES is not obliged to grant your objection if you demonstrate compelling legitimate interests overriding your interests, rights and freedoms; or that the processing is related to the establishment, exercise or defence of legal claims by DIGIC PICTURES

### **5.5. Right to rectification**

Under Article 16 of the GDPR, you have the right to have inaccurate personal data concerning you corrected or incomplete personal data completed by the Data Controller at your request. You can therefore request that the Controller amend any of your personal data (for example, you can change your email address or other contact details at any time).

### **5.6. Right to complain, right to redress**

If you consider that the processing of your personal data by DIGIC PICTURES infringes the provisions of the applicable data protection legislation, in particular the GDPR, you have the right to lodge a complaint with the competent data protection supervisory authority. In Hungary, a complaint can be lodged with the National Authority for Data Protection and Freedom of Information ("NAIH"). The contact details of the NAIH are:

**Website:** [www.naih.hu](http://www.naih.hu)

**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](mailto:ugyfelszolgalat@naih.hu)

You can also take legal action under the GDPR. Your detailed rights and remedies are set out in Chapters III and VIII of the GDPR.

### **5.7. Time limit for replying to the request**

DIGIC PICTURES will ensure that, if you exercise any of your rights in relation to this processing and contact DIGIC PICTURES in this regard, DIGIC PICTURES will respond to such requests without undue delay and in any event within 30 days.

**If you wish to exercise any of your rights, or if you have any questions or comments, please contact us using the contact details provided in section 1 of this Notice.**