

WHISTLEBLOWING POLICY

1. INTRODUCTION

Taking into account Hungary's obligations under international and EU law in line with its anti-corruption efforts, and ensuring the necessary measures to protect whistleblowers as fully as possible, the Parliament, recognising the importance of whistleblowing in the private sector as well, adopted the Act on Complaints, Whistleblowing in the Public Interest and Rules for Reporting Abuse (Act No. XXV of 2023 (hereinafter referred to as the "Complaints Act"), thereby making it mandatory for FLEXION MOBILE PLC (hereinafter referred to as the "Company"; represented by: Flexion Mobile Plc Hungary Branch) to establish an internal abuse reporting system (hereinafter referred to as the "Whistleblowing System").

2. GENERAL PROVISIONS

The Company, as an employer, operates an internal abuse reporting system (hereinafter referred to as the "Abuse Reporting System") in respect of its employees employed in Hungary pursuant to Act XXV of 2023 on Complaints and Reports of Public Interest and on the Rules for Reporting Abuse (hereinafter referred to as the "Complaints Act").

This Policy applies to the Company's operations in Hungary, primarily to Hungarian employees and other Hungarian resident legal entities and Hungarian citizens associated with the Company (personal and territorial scope).

The Hungarian Branch of Flexion Mobile Plc shall act on behalf of and represent the Company in connection with the whistleblowing system set out in this Policy.

3. INTERPRETATIVE PROVISIONS

Complaint: a complaint is a request for the redress of an individual's rights or interests which is not subject to any other procedure, in particular judicial or administrative. A complaint may also contain a proposal;

Public interest report: A public interest report draws attention to a circumstance the remedying or removal of which is in the interest of the community or society as a whole. A public interest report may also contain a proposal;

Notification: a verbal or written communication containing a complaint or a public interest report that is made by a person making a notification to the recipient through the whistleblowing system;

Notifier or Whistleblower: a person who makes a Notification in the Abuse Reporting System;

Whistleblower Protection Lawyer: a lawyer registered as such with the regional bar association of the place of his/her seat, with whom the Company has concluded a contract under the Complaints Act. The mandate and activities of the whistleblower protection lawyer shall be governed by the provisions of the Complaints Act and Act LXXVIII of 2017 on the Activities of Lawyers.

Notified person: a natural person or legal entity concerned by the Notification;

Employment relationship: any legal relationship in which an employed person performs an activity for and under the direction of an employer for remuneration or for self-employment.

Employer: a person who employs a natural person under an employment relationship.

Employed person: a natural person who, for remuneration, performs an activity for and under the direction of an Employer within the framework of an Employment relationship or self-employment.

Disadvantage: Any measure that is detrimental to the whistleblower,

- a) is taken because the notification was lawfully made; and
- b) which is taken in connection with a legal relationship or connection as defined in point 4 of these Rules,
- c) is unlawful even if it would otherwise be lawful.

An act or omission prejudicial to the notifier, in particular:

- a) suspension, collective redundancy, dismissal or equivalent measures,
- b) demotion or refusal to promote,
- c) transfer of duties, change of place of work, reduction of pay, change of working hours,
- d) refusal to provide training,
- e) negative performance appraisals or job references,
- f) the application of any adverse legal consequence under the law applicable to his/her employment relationship, in particular disciplinary measures, reprimands, financial sanctions,
- g) coercion, intimidation, harassment or ostracism,
- h) discrimination, unfavourable or unfair treatment,
- i) failure to convert a fixed-term employment relationship into an employment relationship of indefinite duration, where the employee had a legitimate expectation that his employment relationship would be converted into an employment relationship of indefinite duration,
- j) failure to renew or early termination of a fixed-term employment contract,
- k) damage, which includes damage to a person's reputation or financial loss, including loss of business opportunity and loss of income,
- l) an action as a result of which it may reasonably be concluded that the person concerned will not be able to establish in the future an employment relationship in the sector in which he or she is employed,
- m) the requirement of a medical fitness test,
- n) early termination or cancellation of a contract for goods or services, and
- o) the withdrawal of the authorisation.

4. THE WHISTLEBLOWING SYSTEM

Information about illegal or suspected illegal acts or omissions or other misconduct may be reported verbally or in writing through the Company's Abuse Reporting System.

The Abuse Reporting System is operated by a whistleblower protection lawyer dr. Péter Pozsgay individual lawyer on behalf of the Company in accordance with section 50 of the Complaints Act.

Contact details of the whistleblower protection lawyer:

Place of filing/administration: 1051 Budapest, József nádor tér 9. 3. em. 2., Hungary

Phone: +36205574860

Working days: between 8-16 hours

E-mail: office@drpozsgaypeter.hu

4.1. Persons entitled to make a notification

Notifications can be made by the following notifiers:

- a) a person employed by the Company,
- b) a person 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 commenced.
- d) a self-employed person or a sole proprietorship, if he/she has or has had a contractual relationship with the Company,
- e) a contractor, subcontractor, supplier or person under the supervision and control of a trustee, who is or has been in a contractual relationship with the company, who has commenced the procedure for establishing a contractual relationship,
- f) a trainee or volunteer who has or has had a contractual relationship with the Company.

4.2. Methods of notification

Notification can be made verbally or electronically, in writing by e-mail. A verbal Notification may be made by telephone or in person.

When making a notification, the notifier must declare that the notification is made in good faith concerning circumstances of which he/she is aware or has reasonable grounds to believe to be true.

4.2.1. The verbal notification

Verbal notification can be made by telephone or other voice messaging system, or in person.

In the case of a verbal notification, the whistleblower should be made aware of the consequences of reporting in bad faith, the procedural rules governing the investigation of the notification and that his or her identity will be treated confidentially at all stages of the investigation. The notifier shall be informed that the examination of a notification made by an anonymous or unidentified notifier may be disregarded.

4.2.1.1. Verbal notification by telephone or other voice messaging system

If the notification is made by telephone or other voice messaging system, the consent of the notifier must be obtained in advance before using a fixed telephone line or other fixed voice messaging system.

The whistleblower protection lawyer shall provide the following tasks with regard to the verbal notification made:

- a) after having been informed in accordance with the provisions on the protection of personal data, in a durable and retrievable form; or
- b) in writing and, subject to the possibility of verification, rectification, and acceptance by signature, provide the notifier with a copy.

The procedure in point (b) shall apply if the whistleblower protection lawyer does not use a telephone or other device with a voice message recording system. In such a case, the whistleblower protection lawyer shall record the verbal notification in writing and, while providing the possibility for verification, correction and acceptance by signature, shall provide the notifying party with a copy.

When recording the verbal notification in writing, the lawyer for the protection of the applicant shall draw up a complete and accurate record.

4.2.1.2. Verbal notification in person

You can make a personal notification by appointment at the office of the whistleblower protection lawyer (1051 Budapest, József nádor tér 9. 3. em. 2., Hungary) on working days.

If the whistleblower makes a notification in person at the whistleblower protection lawyer's office, the whistleblower protection lawyer will

- a) after having been informed in accordance with the provisions on the protection of personal data, in a durable and retrievable form; or
- b) in writing and, subject to the possibility of verification, rectification, and acceptance by signature, provide the notifier with a copy.

The whistleblower protection lawyer must keep a complete and accurate record of the written record of the verbal notification made in person.

4.2.2. Written notification

4.2.2.1. The notification may be submitted in writing

- a) at the office of the whistleblower protection lawyer under point 4, either in person or by means of a document delivered by another person,
- b) sent by post to the address of the office of the lawyer for the protection of whistleblowers referred to in point 4, or
- c) by electronic mail to: office@drpozsgaypeter.hu

4.2.2.2. The applicant may also act by proxy. If he acts through an authorised representative, the authorisation must be in the form of an authentic instrument or a private document with full probative value.

4.2.2.3. In the case of a written Notification, the whistleblower protection lawyer will send an electronic confirmation of the Notification to the Notifier by e-mail within 7 (seven) days of receipt of the written Notification. The confirmation shall include general information to the notifier on the procedural and data management rules (Annexes 1 and 2)

5. INVESTIGATION OF THE NOTIFICATION

- 5.1. The whistleblower protection lawyer shall investigate the allegations contained in the Notification received by him/her as soon as possible, but not later than 30 (thirty) days from the date of receipt of the Notification. This time limit may be extended in particularly justified cases, subject to the

simultaneous notification of the whistleblower. In this case, the notifier shall be informed of the expected date of the investigation and the reasons for the extension of the investigation by a short e-mail. The time limit for investigating the notification and informing the notifier shall not exceed 3 (three) months in the case of an extension.

- 5.2. During the investigation of the Notification, the whistleblower protection lawyer shall maintain contact with the Notifier, and may invite the Notifier to supplement or clarify the Notification, to clarify the facts of the case, and to provide additional information.
- 5.3. The investigation of a Notification may be waived if.
 - a) the Notification was made by an unidentified Notifier (an unidentified Notifier is one who, despite reasonable efforts to do so, does not have sufficient information available to the whistleblower protection lawyer regarding the identity of the Notifier);
 - b) the Notification was not made by a person entitled to make the Notification as defined in Clause 4.1 of these Rules;
 - c) the Notification is a repeat Notification by the same Notifier with the same content as the previous Notification; or
 - d) the harm to the public interest or to an overriding private interest would not be proportionate to the restriction of the rights of the person concerned by the notification resulting from the investigation of the notification.
- 5.4. If the investigation of the Notification may be waived pursuant to Section 5.3 of these Rules, the whistleblower protection lawyer shall, pending the determination of that fact, perform the tasks related to the receipt and recording of the Notification and the provision of information related to the Notification.
- 5.5. The investigation of the Notification shall include an assessment of the relevance of the circumstances set out in the Notification and the taking of appropriate measures to remedy the acts or omissions or other abuses that are or are suspected to be unlawful.

In accordance with the requirement of a fair hearing, the notifier and the person concerned by the notification should be given the opportunity to express their views on the notification, including through legal representation, and to provide evidence in support of those views. The person concerned by the notification may exceptionally, and in duly justified cases, be informed at a later stage, if immediate information would frustrate the investigation of the notification.

- 5.6. If the contents of the Notification justify the initiation of criminal proceedings, the Managing Director and the owner of the Company shall be notified, and arrangements shall be made for the filing of a criminal complaint.
- 5.7. If the conduct referred to in the Notification is not found to be a criminal offence, but violates the rules of conduct set by the Company, the Company's manager shall be notified and may take employer action against the employee in accordance with the rules governing the employment relationship.
- 5.8. The whistleblower protection lawyer shall inform the whistleblower in writing of the investigation of the Notification or of the decision not to investigate the Notification and the reasons for the decision not to investigate, the outcome of the investigation of the Notification, and the measures taken or planned. Written information may be waived only if the whistleblower protection lawyer has informed the notifying party verbally and the latter has expressly taken note of the information, which may be verified subsequently.

5.9. The whistleblower protection lawyer will provide clear and easily accessible information on the operation of the Whistleblowing Reporting System, the Whistleblowing process, and the Whistleblowing systems and procedures (Annex 2).

6. EXAMINATION OF THE NOTIFICATION ACCORDING TO THE FORM OF THE NOTIFICATION

6.1. Examination of the verbal notification

6.1.1. A verbal Notification shall be investigated, and the subject matter of the Notification shall be remedied as soon as possible.

6.1.2. If the whistleblower disagrees with the handling of the verbal Notification, the whistleblower protection lawyer shall record the Notification and his/her position on it.

6.1.3. A copy of the record shall be given to the whistleblower in the case of a verbal Notification made in person.

6.1.4. The minutes shall include at least the following:

- a) the name of the notifier,
- b) the address (registered office) of the notifier and, if applicable, his/her postal address,
- c) place, time and manner of filing the application,
- d) a detailed description of the notification, with a separate record of the objections to which the notification relates, in order to ensure that all the objections contained in the notifier's notification are fully investigated,
- e) a list of documents, records and other evidence produced by the notifier,
- f) where an immediate examination of the notification is not possible, the signatures of the person recording the minutes and the notifier,
- g) the place, time and date of the taking of the minutes
- h) an indication of the subject matter of the notification.

6.2. Examination of a written notification

6.2.1. Within 7 (seven) days of receipt of the written notification in the notification system, the whistleblower protection lawyer will send the notifier an acknowledgement of the notification.

6.2.2. The confirmation shall include general information to the whistleblower on the procedural and data handling rules under the Complaints Act.

6.2.3. The whistleblower protection lawyer shall investigate the allegations contained in the notification within the shortest time possible under the circumstances, but not later than thirty (30) days from the receipt of the notification.

6.2.4. The 30-day time limit may be extended in particularly justified cases, subject to the simultaneous notification of the applicant. In this case, the notifier shall be informed of the expected date of the investigation and the reasons for the extension. The time limit for investigating the notification and informing the notifier shall not exceed 3 (three) months in the case of an extension.

6.2.5. On the basis of the notification, if it proves to be well-founded, provision shall be made for

- a) to restore the lawfulness or the public interest or to take any other necessary measures,
 - b) to remedy the causes of the defects found,
 - c) to remedy the damage caused; and
 - d) where justified, to initiate proceedings for liability.
- 6.2.6. If the notification is rejected or if the 30 calendar day time limit for responding to the notification laid down in the Complaints Act has expired without result, the notifying party who is a consumer may apply to a conciliation body or the court, and the notifying party who is not a consumer may apply to the court.

7. PROTECTION OF THE WHISTLEBLOWER

- 7.1. The applicant shall not suffer any disadvantage if the application is lawfully filed.
- 7.2. Where a notification has been lawfully made, the notifier shall not be liable for obtaining or having access to the information contained in the notification, unless the notifier has committed a criminal offence by obtaining or having access to the information.
- 7.3. The notifier shall not be held liable for lawfully making a notification if the notifier had reasonable grounds to believe that the notification was necessary to disclose the circumstances to which the notification relates.
- 7.4. The whistleblower may avail himself of the assistance provided for in Act LXXX of 2003 on Legal Aid under the conditions set out therein.
- 7.5. In all other respects, the rules of lawful notification and the protection of the whistleblower shall be governed by the provisions of Chapter II, point 8 of the Complaints Act.
- 7.6. In the course of administrative or judicial proceedings relating to a Disadvantage, if the whistleblower proves that the complaint was lawfully made
- a) the Disadvantage must be presumed to have been taken as a result of the lawful making of the notification; and
 - b) the burden of proving that the Disadvantage was taken for a valid reason and not because the Notification was lawfully made rests with the person who took the adverse action.
- 7.7. Where a Notification is lawfully made, the Notifier shall not be deemed to have breached any restriction on disclosure of a legally protected secret or any other legal restriction on disclosure of information and shall not be liable in respect of such Notification if the Notifier had reasonable grounds to believe that the Notification was necessary to disclose the circumstances to which the Notification relates.
- 7.8. Where a Notification has been lawfully made, the Notifier shall not be liable for obtaining or having access to the information contained in the Notification, unless the Notifier has committed a criminal offence in obtaining or having access to the information. A notifier shall not be held liable for lawfully making a Notification if the notifier had reasonable grounds to believe that the Notification was necessary to disclose the circumstances to which it relates. The notifier may rely on the foregoing in any administrative or judicial proceedings, in addition to proving that the notification was lawful.
- 7.9. The notification is lawful if

- a) the Whistleblower has made the Notification in accordance with the rules set out in the Abuse Reporting System, these Rules or the Complaints Act;
- b) the Whistleblower obtained the reported information concerning the circumstances to which the Whistleblowing relates in the context of his or her employment-related activities; and
- c) the Whistleblower had reasonable grounds to believe that the information reported concerning the circumstances to which the Whistleblowing relates was true at the time of the Notification.

7.10. The protection applicable to a whistleblower shall apply to a person who

- a) assists a lawful Notifier in making a Notification,
- b) any person associated with the lawful Notifier, in particular a co-worker or family member of the Notifier, who may be subject to adverse action.

8. RULES ON DATA PROCESSING IN RELATION TO THE NOTIFICATION

8.1. Within the framework of the Whistleblowing System

- a) to the Notifier,
- b) the person whose conduct or omission gave rise to the Notification, and
- c) the person who may have material information about the facts contained in the Notification, personal data which are essential for the investigation of the Notification may be processed solely for the purpose of investigating the Notification and remedying or stopping the conduct that is the subject of the Notification.

8.2. The following information may be requested from the notifier and the person concerned during the notification:

- a) name,
- b) address, registered office, postal address,
- c) telephone number,
- d) method of notification,
- e) description of the notification, reason for notification,
- f) copies of any documents in the possession of the notifying party which are not available to the Company to support the notification,
- g) in the case of a notifier acting by proxy, a valid power of attorney and
- h) any other information necessary to investigate and respond to the notification.

8.3. Personal data not covered by 8.2 shall be deleted without delay from the data processed under the Abuse Reporting System.

8.4. Personal data of the Whistleblower, with the exception of the data of the Whistleblower who has provided manifestly malicious or false information, may only be transferred to a public body or authority competent to conduct proceedings initiated on the basis of the Whistleblowing, if such public body or authority is entitled to process the data by law or if the Whistleblower has consented to the transfer of his/her data. The personal data of the notifier shall not be disclosed without his/her explicit consent.

- 8.5. If it has become apparent that the Whistleblower has, in bad faith, provided false data or information and
- a) in this context, if there are circumstances indicating that a criminal offence or irregularity has been committed, the personal data of the notifier must be disclosed to the public body, authority or person entitled to conduct the proceedings,
 - b) there are reasonable grounds for believing that he or she has caused unlawful harm or other legal damage to another person, his or her personal data must be disclosed at the request of the public body, authority or person entitled to initiate or conduct the proceedings.
- 8.6. If the Notification concerns a natural person, in the exercise of the right of information and access of that natural person under the provisions on the protection of personal data, the personal data of the Notifier shall not be disclosed to the person requesting the information.
- 8.7. The transfer of data processed within the framework of the Abuse Reporting System to a third country or an international organisation may only take place in the case of a legal commitment by the recipient of the transfer to comply with the rules on reporting set out in the Complaints Act and subject to the provisions on the protection of personal data.
- 8.8. The Notifier who discloses his or her identity, the person affected by the Notification or the person who may have material information about the Notification, shall not disclose personal data to anyone other than the authorized persons. Pending the conclusion of the investigation or the initiation of formal charges as a result of the investigation, the persons investigating the Notification may share information about the content of the Notification and the person concerned by the Notification with other departments or employees of the Company to the extent strictly necessary for the conduct of the investigation, in addition to informing the person concerned by the Notification.
- 8.9. The person concerned by the Notification and the person who may have material information about the facts contained in the Notification shall be informed in detail about the Notification, his/her rights regarding the protection of his/her personal data and the rules on the processing of his/her data at the start of the investigation. In accordance with the requirement of a fair hearing, it should be ensured that the person concerned by a notification or in possession of material information about the facts contained in a notification can express his views on the notification through his legal representative and that he can provide evidence in support of his views.
- 8.10. Exceptionally, and in justified cases, the person concerned by a Notification or the person who has substantial information about the facts contained in the Notification may be informed at a later date, if immediate information would prevent the investigation of the Notification.
- 8.11. The Company shall publish detailed information in Hungarian and in English languages on the operation of the notification system and the notification procedure on its website.
- 8.12. If the investigation reveals that the notification is unfounded or that no further action is necessary, the data relating to the notification shall be deleted within 60 days of the completion of the investigation.
- 8.13. If action is taken on the basis of the investigation, including legal proceedings or disciplinary action against the person making the Notification, the data relating to the Notification may be processed in the Company's reporting system until the final conclusion of the proceedings initiated on the basis of the Notification at the latest.

9. REGISTRATION OF THE NOTIFICATION

- 9.1. A record shall be kept of the notifications and of the measures taken to resolve and resolve them.
- 9.2. The register shall include:
 - a) a description of the notification, the event or fact which is the subject of the notification,
 - b) the date of filing of the notification,
 - c) a description of the action taken to settle or resolve the notification and, if the notification is rejected, the reasons for rejection,
 - d) the time limit for compliance with the measure and the name of the person responsible for its implementation,
 - e) the date of posting of the reply to the notification.
- 9.3. Data relating to third parties not involved in the notification, which are not necessary for the investigation of the notification and which cannot be processed pursuant to the Complaints Act, shall be deleted from the notification system without delay.

10. MISCELLANEOUS PROVISIONS

- 10.1. In matters not regulated in detail in these Rules, the Complaints Act and the statutory provisions on the processing of personal data, in particular the EU General Data Protection Regulation (GDPR), shall apply.

Annex 1 to the FLEXION MOBILE PLC Whistleblowing Policy

INFORMING THE NOTIFIER ABOUT THE PROTECTION OF PERSONAL DATA

INFORMATION ON DATA PROCESSING

ON THE PROCESSING OF PERSONAL DATA THAT IS STRICTLY NECESSARY FOR THE PURPOSES OF THE INTERNAL WHISTLEBLOWING SYSTEM

1. The Data Controller

Data Controller: FLEXION MOBILE PLC (represented by: Flexion Mobile Plc Hungarian Branch Office)

Harbour Yard, Unit G5, Chelsea Harbour, London, SW10 0XD., United Kingdom, company registration number: 4306881

represented by: Péter Zoltán Takács managing director

e-mail: budapest@flexionmobile.com

website: <https://flexion.games/>

(hereinafter referred to as the "Data Controller")

2. Personal data necessary for the purposes of the internal whistleblowing system (hereinafter: whistleblowing system)

Information about illegal or suspected illegal acts or omissions or other misconduct can be reported to the Abuse Reporting System. The whistleblower, i.e. you, can make the Notification in writing or verbally. The internal whistleblowing system will process the personal data of the whistleblower and the personal data of the person whose conduct or omission gave rise to the whistleblowing and who has relevant information in relation to the whistleblowing. All other personal data not covered by the foregoing shall be deleted from the notification system without delay.

Legal basis for processing: to fulfil a legal obligation. [Article 6(1)(c) GDPR] We are obliged to investigate and process the notification under Act XXV of 2023 on complaints, notifications of public interest and rules on the notification of abuse.

Purpose of processing: only to investigate the notification and to remedy or stop the conduct that is the subject of the notification.

Duration of processing: the data will be kept until the purpose specified above has been achieved.

Recipients: the personal data of the notifier may be disclosed only to the public body or authority competent to conduct the procedure initiated on the basis of the notification, if that public body or authority is entitled to process the data by law or if the notifier has consented to the disclosure of the data. Personal data of the notifier shall not be disclosed without his/her consent. Where it has become apparent that the whistleblower has communicated false data or information in bad faith, his or her personal data shall be disclosed, upon request, to the body or person entitled to initiate or conduct the relevant proceedings.

Transfers to third countries or international organisations: only in the case of a legal obligation and subject to the rules on the protection of personal data.

3. Whistleblower rights

In relation to the processing of your data, you have the rights detailed in sections 3.1.-3.4 below. If you wish to exercise any of these rights, please write to us using one of the contact details below:

Address: Flexion Mobile Plc Hungarian Branch Office - 1023 Budapest, Árpád fejedelem útja 26-28. 5. em., Hungary

E-mail address: budapest@flexionmobile.com

Identification

We will always need to identify you before we can process your request. If we cannot identify you, we will unfortunately not be able to fulfil your request.

Responding to your request

Once identified, we will provide you with information about your request in writing, electronically or, at your request, verbally. Please note that if you have submitted your request electronically, we will respond electronically. You will of course have the option to request another method in this case.

Deadline for taking action

We will inform you of the action taken on your request within 1 (one) month of receiving it at the latest. If necessary, and taking into account the complexity of the request and the number of requests, this time limit may be extended by a further 2 (two) months, and you will be informed within the 1 (one) month time limit.

We are also obliged to inform you of any failure to take action within the one-month time limit. You can lodge a complaint with the NAIH (point 4.1) and exercise your right to a judicial remedy (point 4.2).

The administration fee

The information and action requested is free of charge. An exception is made where the request is manifestly unfounded or excessive, in particular because of its repetitive nature. In this case, we may charge a fee or refuse to comply with the request.

3.1. You may request information (access)

You can request information on whether your personal data is being processed and if so:

- What is the purpose?
- What exactly is the data being processed?
- To whom do we transfer this data?
- How long do we store this data?
- What rights and remedies do you have in this regard?
- Who gave us your data?

Do we make automated decisions about you using your personal data? In such cases, you may also request information about the logic (method) we use and the significance and likely consequences of such processing.

If you have found that we have transferred your data to an international organisation or a third country (non-EU Member State), you can ask for a description of how we guarantee the fair processing of your personal data.

You can request a copy of the personal data we process (We may charge a fee based on administrative costs for additional copies.)

3.2. You may request a correction

You can ask us to correct or complete personal data that is inaccurate or incomplete.

3.3. You may request the deletion of your personal data ("forgetting")

You can ask us to delete your personal data if:

- The personal data is no longer necessary for the purposes for which it was processed;
- Where the processing is based solely on your consent;
- If your objection is effective;
- If we are found to be processing your personal data unlawfully;
- EU or national law requires it.

We may not delete personal data if it is necessary:

- for the exercise of the right to freedom of expression and information;
- to comply with an obligation under Union or Member State law that requires the controller to process personal data, or for reasons of public interest;
- in the public interest in the field of public health
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, where deletion would be likely to render impossible or seriously impair such processing; or
- for the establishment, exercise or defence of legal claims.

3.4. You may request that we restrict the processing

You may request that we restrict processing if one of the following conditions is met:

- You contest the accuracy of the personal data, in which case the restriction applies for the period of time that allows us to verify the accuracy of the personal data;
- The processing is unlawful, but you oppose the erasure of the data and instead request the restriction of their use;
- We no longer need the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims;
- You have objected to the processing; in this case, the restriction applies for a period of time until it is established whether the legitimate grounds of the Controller prevail over your legitimate grounds.

In the case of restriction, personal data may be processed, except for storage, only with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another

natural or legal person or for important public interests of the Union or of a Member State. You will be informed in advance of any lifting of the restriction.

4. Legal remedies

4.1. You can complain to the NAIH

If you believe that the processing of personal data about you is in breach of the provisions of the Data Protection Regulation, you have the right to lodge a complaint with the National Authority for Data Protection and Information Security (NAIH).

NAIH

President: dr. Attila Péterfalvi

Postal address: 1363 Budapest, Pf. 9.

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

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

Web: <http://naih.hu>

E-mail: ugyfelszolgalat@naih.hu

4.2. You may go to court

If you believe that the processing of your personal data is in breach of the provisions of the Data Protection Regulation and that your rights under the Data Protection Regulation have been infringed, you have the right to take legal action.

The court will have jurisdiction to hear the case. The lawsuit may also be brought, at the option of the data subject, before the courts for the place where the data subject resides or is domiciled. A person who does not otherwise have legal capacity to sue may also be a party to the lawsuit. The Authority may intervene in the proceedings in order to ensure that the person concerned is successful.

In addition to the provisions of the Data Protection Regulation, the court proceedings shall be governed by the provisions of Title XII, Part Three, Book Two (§ 2:51 - § 2:54) of Act V of 2013 on the Civil Code and other legal provisions applicable to court proceedings.

4.3. Compensation and damages

If the Data Controller causes damage or infringes the personal rights of the data subject by unlawfully processing the data subject's data, the Data Controller may be liable to pay damages. The controller shall be exempted from liability for the damage caused and from the obligation to pay the damage fee if it proves that the damage or the infringement of the data subject's personality rights was caused by an unforeseeable cause outside the scope of the processing.

5. Data security

We will make every effort to implement appropriate technical and organisational measures to ensure a level of data security appropriate to the level of risk, taking into account the state of the art, the cost of implementation, the nature of the processing and the risk to the rights and freedoms of natural persons.

Personal data will always be treated confidentially, with limited access, encryption and to the maximum extent possible resilience, ensuring recoverability in case of problems. Our systems are regularly tested to guarantee security. In determining the appropriate level of security, we take into account the risks arising from the processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to personal data transmitted, stored or otherwise processed.

We will do our utmost to ensure that persons acting under our control who have access to personal data are only allowed to process that data in accordance with our instructions, unless they are required to do otherwise by EU or Member State law.

6. Other

The Controller may amend this Privacy Notice at any time. Any changes will take effect at the same time as they are posted on the website and will be announced in a pop-up window on the website.