

Data Processing Notice

on the Company's data processing activities related to whistleblowing

EPDB Nyomtatási Központ Zrt. (hereinafter: the Company) informs data subjects that the tasks related to whistleblowing pursuant to Act XXV of 2023 on complaints, public interest disclosures, and the rules related to reporting abuses (hereinafter: Complaints Act) are carried out by Magyar Posta Zrt. on the basis of the agreement between the Company and Magyar Posta Zrt. Given that Magyar Posta Zrt. carries out the activity independently from and without influence from the Company [Complaints Act, Section 22 (4)], Magyar Posta Zrt. is also the data controller for the related data processing.

1. Data Controller

Magyar Posta Zrt. (Registered office: 1138 Budapest, Dunavirág utca 2-6., Company registration number: 01-10-042463)

The representative of the data controller for the present data processing: Dr. Enikő Kovács, compliance advisor; electronic contact: complianceosztaly@posta.hu

Contact details of the Data Protection Officer of Magyar Posta Zrt.: adatvedelem@posta.hu

2. What entitles the Data Controller to process the data?

Magyar Posta Zrt. processes data on the basis of Section 26 of Act XXV of 2023 on complaints, public interest disclosures, and the rules related to reporting abuses [Article 6(1)(c) of the General Data Protection Regulation].

The management of the reporting system and the data of the reporting person in accordance with the referenced act also serves the fulfilment of the Company's legal obligation set out in Section 7 (2) of Government Decree 339/2019 (XII.23.) on the internal control system of companies in public ownership.

3. What data do we process?

The following table sets out the data processed and the purpose of processing:

Data	Why?
name	– if provided by the reporting person, for the purpose of identifying and addressing the reporting person [Act XXV of 2023, Section 22 (6) a) and c)] – for the purpose of identifying and addressing the person affected by the report / who has material information regarding the content of the report – for the purpose of identifying and addressing the person acting as representative of the reporting person / the person affected by the report
name at birth	– if provided by the reporting person, for the purpose of identifying the reporting person [Act XXV of 2023, Section 22 (6) a) and c)] – for the purpose of identifying the person affected by the report / who has material information regarding the content of the report – for the purpose of identifying the person acting as representative of the reporting person / the person affected by the report
mother's name at birth	– if provided by the reporting person, for the purpose of identifying the reporting person [Act XXV of 2023, Section 22 (6) a) and c)] – for the purpose of identifying the person affected by the report / who has material information regarding the content of the report – for the purpose of identifying the person acting as representative of the reporting person / the person affected by the report
place and date of birth	– if provided by the reporting person, for the purpose of identifying the reporting person [Act XXV of 2023, Section 22 (6) a) and c)] – for the purpose of identifying the person affected by the report / who has material information regarding the content of the report – for the purpose of identifying the person acting as representative of the reporting person / the person affected by the report

job title	for the purpose of identifying the employee affected by the report / who has material information regarding the content of the report
data establishing representative authority (e.g. bar association membership number of legal representative, employer, office)	establishing representative authority and ensuring the right to make statements through a legal representative [Act XXV of 2023, Section 27 (2)]
data regarding the connection with Magyar Posta Zrt. establishing the right to make a report [Act XXV of 2023, Section 20 (2)-(3)]	for the purpose of establishing the right to make a report [Act XXV of 2023, Section 22 (6) b)]
contact details (address and/or e-mail address and/or telephone number)	for the purpose of maintaining contact, cooperating and communicating with the data subject or their representative during the investigation [Act XXV of 2023, Section 22 (5)]
signature	for the purpose of establishing and proving the authenticity of the document and its origin from the data subject [Act XXV of 2023, Section 21]
data contained in the report relating to the person affected by the report / the person who has material information regarding the content of the report	for the purpose of identifying the person affected by the report / the person who has material information regarding the content of the report and investigating the report, remedying or terminating the conduct that is the subject of the report, and in justified cases, for the purpose of imposing sanctions
any further personal data presented by the reporting person	– for the purpose of recording, reconstructing (ensuring the recollectability of), proving and compiling the minutes of the full and accurate content of the report [Act XXV of 2023, Section 21 (5)] – for the purpose of conducting the investigation professionally and lawfully, and for establishing and proving the historical and legal facts
name, job title and organisational unit of the investigator notified of the report	for the purpose of recording the transfer of the report for investigation
name, job title and organisational unit of the person authorised to impose sanctions	for the purpose of recording the decision regarding any potential imposition of sanctions

4. For what purpose does Magyar Posta Zrt. process the data?

Magyar Posta Zrt. processes the data for the purpose of investigating the report and remedying or terminating the conduct that is the subject of the report, and in justified cases, for the purpose of imposing sanctions.

5. How long does Magyar Posta Zrt. process the data?

The content of the report must be investigated within the shortest period permitted by the circumstances, and in any case within thirty days of the receipt of the report (Complaints Act, Section 22), from which deadline deviation is only permissible in particularly justified cases, while simultaneously informing the reporting person. The duration of the investigation may not exceed three months. In the case of reports whose retention is required by the fulfilment of a legal obligation or legal proceedings, the reports and their data shall be retained until the fulfilment of the legal obligation or the final conclusion of the proceedings.

6. To whom does Magyar Posta Zrt. disclose the data (who are the recipients of the data)?

Magyar Posta Zrt. shall disclose the data to the organisation(s) authorised to conduct criminal proceedings on the basis of Section 23 (2) of the Complaints Act, if the initiation of criminal proceedings is justified on the basis of the report.

Magyar Posta Zrt. has a legal obligation pursuant to Section 6 (4) of the Complaints Act to transfer the data of the reporting person to the organisation conducting the proceedings, if the reporting person communicated false data or information in bad faith and:

- circumstances arise suggesting the commission of a criminal offence or regulatory infringement, or
- it is reasonably probable that unlawful damage or other legal harm has been caused to another, and the disclosure of the data was requested by the organisation authorised to initiate or conduct the proceedings.

Magyar Posta Zrt. may transfer the data to persons, organisations and authorities authorised thereto by law, upon a written official request.

Magyar Posta Zrt. does not engage any data processor for the processing of the data.

7. What rights do you have?

Magyar Posta Zrt. shall provide its response to the request of the data subject without undue delay, and in any case within one month of the submission of the request. If the request is very complex or a large number of requests are submitted, Magyar Posta Zrt. is entitled to extend this deadline by 2 months, but the data subject will be notified of this within 1 month.

If for any reason we are unable to fulfil the request of the data subject, we will also inform them of the reasons for this within 1 month of the submission of the request.

We inform data subjects that in the event of unfounded or regularly repeated, excessive requests relating to the same data, we may charge a fee for compliance or refuse the request.

Magyar Posta Zrt. informs data subjects that if in their request for erasure, rectification or restriction of data processing they indicate that Magyar Posta Zrt. should inform them of those who have processed or to whom their data have been transferred, Magyar Posta Zrt. will also inform them of these persons in its response to their request.

You may exercise your rights regarding the processing of your data by submitting a request to the following contact details:

- by e-mail: complianceosztaly@posta.hu
- by post: Magyar Posta Zrt. Compliance Department, Whistleblowing System, 1540 Budapest

7.1. Requesting access (information)

Data subjects may at any time request information as to whether Magyar Posta Zrt. processes their data, and if so, they may also obtain access to them.

If the data subjects do not specifically indicate in their request what they wish to know about the data processing concerning them, we will provide information on the following in addition to their data:

- what data Magyar Posta Zrt. processes about them,
- where it obtained them from (source of the data),
- for what purpose Magyar Posta Zrt. processes their data (regarding the purpose of data processing),
- what entitles Magyar Posta Zrt. to process the data (legal basis),
- from when and for how long Magyar Posta Zrt. processes their data (duration),
- those to whom Magyar Posta Zrt. has disclosed or will disclose the data,
- what rights data subjects have in connection with the processing of their data.

7.2. Requesting rectification (modification) of data

The data subject may request the rectification of their data. If Magyar Posta Zrt. processes incorrect or inaccurate data about the data subject, they may request its modification to the correct, accurate data. The accuracy of the data to be modified must be substantiated, and it must also be proven that the requesting party is entitled to request the modification of the data. Magyar Posta Zrt. can only assess in this way whether the new data is accurate and, if so, whether it can replace the old one.

If it is not clear whether the data being processed is correct or accurate, Magyar Posta Zrt. will not rectify the data but will restrict its processing until the accuracy of the data has been verified.

7.3. Requesting restriction of data processing

The data subject may request that Magyar Posta Zrt. restrict the processing of their data. In this case, Magyar Posta Zrt. will not use the data subject's data but will only store them. Magyar Posta Zrt. restricts the processing of the data subject's data if:

- the data subject disputes the accuracy of the data processed by Magyar Posta Zrt., but the accuracy of the data subject's data still needs to be verified;
- the data subject objects to the erasure of their data by Magyar Posta Zrt. and requests its retention;
- the data subject requires that Magyar Posta Zrt. retain their data because they wish to use them to assert a legal claim (e.g. they wish to initiate legal proceedings);
- the data subject has objected to the data processing and it still needs to be examined whether the data subject's objection is well-founded.

Magyar Posta Zrt. shall inform the data subject in advance of the lifting of the restriction.

7.4. Right to erasure, portability and the right to object to data processing

Given that Magyar Posta Zrt. processes the data subject's data for the purpose of fulfilling a statutory obligation, their erasure cannot be carried out by Magyar Posta Zrt. These data must namely be mandatorily used and recorded by Magyar Posta Zrt.

For the same reason, even in the event of an objection to the processing of the data subject's data, Magyar Posta Zrt. is not entitled to erase the data.

Furthermore, in the case of data processing based on a statutory obligation, the data subject does not have the right to data portability.

8. Where can you turn to protect your rights?

We recommend first contacting Magyar Posta Zrt. with your complaint at the contact details specified in section 7, so that we can handle it. You may also contact the Hungarian National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa utca 9-11., postal address: 1363 Budapest, P.O. Box 9., e-mail: ugyfelszolgalat@naih.hu, website: naih.hu), as well as — at your choice — the court of the region of your place of domicile or habitual residence.