

# Abuse reporting system

**Gamax Ltd.** operates an abuse reporting system in accordance with the provisions of Act XXV of 2023 on Complaints, Notifications of Public Interest and Rules on Reporting Abuse (Complaints Act).

## A) Abuse reporting system leaflet

### 1. What is it?

You can report suspected crime, infringement or other abuse in confidence through the abuse reporting system.

### 2. Who is entitled to make a notification?

Abuse may be reported by our current employees, former employees, employees in the process of being hired, and all third parties who have or have had a contract with us or are in the process of contracting with us, our managers, owners, trainees.

### 3. Protection of whistleblowers

The protection of whistleblowers is of paramount importance, which is why we ensure that whistleblowers are not subject to any form of retaliation, discrimination or other unfair treatment. In the case of reports made in good faith but found to be unfounded during the procedure, the investigation will be closed.

However, reporting in bad faith is prohibited. A report made in bad faith may be forwarded to the person concerned and to the competent authorities (third parties), which may lead to civil and criminal penalties.

### 4. How to make a notification?

The report can be made either by identifying yourself or anonymously. However, our company may choose not to investigate anonymous reports.

If you are making a report by claiming your identity, please provide your name and contact details (e-mail address, telephone number) so that we can contact you to clarify any further issues during the investigation of the report and provide you with information on the steps of the procedure.

### 5. Where can I make the notification?

Notifications can be made:

- By phone: +36 30 7433406
- By mail to 1114 Budapest, Bartók Béla út 15/d. II/18
- In person: at any of our offices
- through the Tell Us program on our website.

A record is made of all reports made in person or orally and explained to the person making the report. The whistleblower may check the record, ask for it to be corrected, amend it or sign it as an approval.

### 6. What happens after the notification is sent?

Written feedback will be sent to the notifier when the notification has been made. The notifier may be invited to supplement or clarify the notification, to clarify the facts and to provide further information.

Our Company will also ensure that the person concerned about the notification can express his or her views on the notification at any time, including through a legal representative, and provide evidence in support of those views.

At the start of the investigation, the person concerned will be informed in detail about the notification, his or her rights regarding the protection of personal data and the rules on the processing of personal data. The person concerned will not be informed at the opening of the investigation in the case, when immediate information would prevent the investigation of the notification.

We will investigate the allegations in the notification within the shortest time possible under the circumstances, but no later than 30 days from the date of the notification. Where justified, this time limit may be extended once, and the notifier will be informed accordingly. The time limit for the investigation may not exceed 3 months.

#### **7. When can the investigation of a notification be waived?**

The examination of the notification may be waived if

- a) the notification was made anonymously, without revealing the identity of the notifier, or, if
- b) the application is a repeat application by the same applicant with the same content as the previous application, and if
- c) the notification was made after the expiry of six months from the date on which the person became aware of the act or omission complained of, and finally, if
- 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 resulting from the investigation of the notification.

#### **8. What action will be taken following an investigation?**

Following the investigation of the complaint, we will inform the complainant of the outcome of the investigation and the action taken. If the investigation reveals a violation, we will take the necessary measures to prevent it, to hold the persons responsible to account or, if criminal proceedings are warranted, we will decide whether to bring a complaint. If the investigation concludes that the complaint is unfounded or that no further action is necessary, the procedure will be closed.

## **B) Information Notice on Reporting Abuse**

### **1. Who processes your personal data? Who is the data controller?**

The controller of personal data processed in connection with the whistleblowing system:

Name of data controller: **GAMAX Kft.**

head office: 1114 Budapest, Bartók Béla út  
15/d. II/18.

company registration number: 01-09-067822

court of registration: the Commercial Court of  
the Metropolitan Court of Budapest

Tax number: 10383571-2-43

(hereinafter "**GAMAX Ltd.**", "**we**" or "**our**")

**How to contact us for questions about data  
management:**

postal address: 1114 Budapest, Bartók Béla út  
15/d. II/18.

e-mail account: [adatvedelem@gamax.hu](mailto:adatvedelem@gamax.hu)

phone: +36 30 7433406

web: [www.gamax.hu](http://www.gamax.hu)

### **2. Whose personal data does the controller process?**

This privacy notice describes how the data controller collects, processes and protects personal data of the person who reports the abuse (the "Reporting Party"), the person whose conduct or omission gave

rise to the report (the "Reporting Party") and the person who may have material information about the facts of the report (the "Reporting Party") (collectively referred to as the Data Subjects).

For the sake of clarity, the controller will not process the personal data of the notifier if the notification is anonymous.

### **3. Scope of personal data processed**

The data controller processes personal data relating to the data subjects necessary for the processing and investigation of the notification. These are the following

- Data for the identification of data subjects
- Information contained in the notification
- Information about the investigation
- Contact details (e-mail address and telephone number) - only if the notifier provides this information in the notification or in the additional information.

### **4. Purpose of data processing**

Personal data may only be processed for the purpose of investigating the notification and remedying or stopping the conduct that is the subject of the notification.

### **5. Legal basis for processing**

Given that we have more than 50 employees, the operation of the internal abuse reporting system is mandatory for our company under Act XXV of 2023 on the Rules for Reporting Abuse (the Complaints Act), and the legal basis for data processing is to fulfil the legal obligations under this Act.

### **6. Data retention period**

Personal data that are not necessary for the purpose of the notification will be deleted immediately.

If the investigation reveals that the notification is unfounded or that no further action is necessary, the personal data relating to the notification will be deleted within 60 days of the end of the investigation.

If action is taken on the basis of the investigation, including legal proceedings against the person who made the notification, the data relating to the notification will be processed until the final conclusion of the proceedings based on the notification at the latest.

### **7. Who has access to personal data and is it transferred to third parties?**

The internal whistleblowing system is designed in such a way that the personal data of the whistleblower who discloses his or her identity and of the person concerned cannot be disclosed to anyone other than the authorised persons. Pending the conclusion of the investigation or the initiation of formal prosecution as a result of the investigation, the persons investigating the report may, in addition to informing the person concerned, share information about the content of the report and the person concerned with other departments or staff of the employer to the extent strictly necessary for the conduct of the investigation.

If a whistleblower protection lawyer or an external organisation is involved in the investigation, the personal data may also be transferred to them.

ARRABONA-WORK Kft. (registered office: 9165 Cakóháza, Fő utca 41., company registration number: 08-09-030073) may have access to personal data as a data processor in connection with the operation of the Tell Us online abuse reporting platform.

The personal data of the notifier shall not be disclosed without his/her consent. Where the notification concerns a natural person, in exercising his or her right of information and access 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.

If it has become apparent that the whistleblower has communicated false data or information in bad faith and

(a) where there are indications that a criminal offence or irregularity has been committed, the personal data must be handed over to the authority or person responsible for the procedure,

(b) there are reasonable grounds for believing that he or she has caused unlawful damage or other legal harm to another person, his or her personal data must be disclosed to the body or person entitled to initiate or conduct the proceedings, at the request of that person.

The transfer of data processed under the internal whistleblowing system to a third country or an international organisation may only take place if the recipient of the transfer has given a legal undertaking to comply with the rules on reporting set out in this Act and subject to the provisions on the protection of personal data.

## 8. What rights do data subjects have?

- **Right of access:** at any time, data subjects can use the contact details provided above to request information about whether we process their personal data and, if so, to request further information about:

the purposes of the processing, the legal basis for the processing, the personal data we process, the categories of personal data processed, the recipients or categories of recipients (including data processors we use) to whom or which the personal data have been or will be disclosed (in the case of transfers to third countries, the safeguards to ensure adequate protection of the data), the legal basis for the transfer, the duration of the storage of the data, the right of the data subject to obtain from the controller the rectification, erasure or restriction of the processing of personal data relating to him or her and to object to the processing of such personal data, the right to lodge a complaint with the NAIH, the source of the data, the circumstances of the possible personal data breach, its effects and the measures taken to remedy it

Together with the information, we will also provide the data subject with a copy of his or her personal data processed by us. The first copy is free of charge, but we are entitled to charge a reasonable fee for each additional copy based on our administrative costs. The amount of this charge will be communicated to the data subject in advance.

- **The right to rectification and addition:** If you become aware that any of your personal data is incorrect, inaccurate or incomplete, please provide us with the correct or additional information as soon as possible so that we can make the correction or completion.

- **Right to erasure ("right to be forgotten"):** The data subject has the right to request the erasure of his or her personal data. Withdrawal of consent to data processing also implies the erasure of the data, unless there is another legal basis for the processing. Please note that we may refuse to erase the data in particular if we need or may need the data to comply with a legal obligation or to pursue a claim.

Cancellation is also possible if

- the data are no longer necessary for the original purpose of the processing;
- the processing of the data is unlawful;
- we are required to delete it by European Union or national law.

- **Right to restriction of processing:** In the course of the processing, the data subject may request the restriction of processing if (i) he or she contests the accuracy of the personal data, in which case the restriction shall apply for the period of time necessary to allow us to verify the accuracy of the personal data; (ii) the processing is unlawful but the data subject opposes the erasure of the data and requests instead the restriction of their use; (iii) we no longer need the personal data for the purposes of processing but the data subject requires them for the establishment, exercise or defence of legal claims; (iv) the data subject has objected to the processing, in which case the restriction applies for a period of time until it is determined whether legitimate grounds prevail over the data subject's legitimate grounds.

In the case of restriction, the data will only be stored and no further processing will be carried out unless the data subject consents to the further processing or the further processing is necessary for the protection of his or her rights or the rights of a third party or is in the public interest.

In the event of a restriction of processing, the data subject will be informed in advance.

#### **9. How can the data subject exercise the above rights?**

If you wish to exercise any of the above rights, please send us your request in writing to one of our contact details indicated above. In your letter, please also include your identification details and postal address. If we have any doubt about your identity or if the information provided is insufficient to identify you, we may ask you for additional identification information.

Your request will be fulfilled within 1 month. If necessary, we are entitled to extend this period by a further 2 months and will send you a reasoned decision.

Valid requests will be granted free of charge. However, if the request is manifestly unfounded or excessive, in particular because of its repetitive nature, we are entitled to charge a reasonable fee or even refuse to act on the request.

We will inform all those to whom we have disclosed the data concerned of the rectification, erasure or restriction of the data, unless this proves impossible or involves a disproportionate effort. At your request, we will inform you of the recipients to whom we have communicated or informed as described above.

#### **10. Who can you contact with a complaint about the processing of your personal data?**

If you believe that we are not acting lawfully in processing your personal data, please first contact us as the data controller using one of the contact details provided above in order to enable us to process your comments as quickly and efficiently as possible.

In the event of unlawful data processing, you are also entitled to turn to the National Authority for Data Protection and Freedom of Information (NAIH) and initiate its proceedings.

Contact details of the NAIH:

Website: <http://www.naih.hu/>

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

postal address: 1363 Budapest, Pf.: 9.

e-mail address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Please note that you have the right to pursue your claim in court. The courts have jurisdiction to hear the case. You can bring your claim before the court where we are based or before the court where you live or reside.

Budapest, 23 January 2024.

GAMAX Ltd.