



**Dear Whistleblower / Person with information / concerned Person,**

integrity and compliance are the basis of our corporate activities, making them the highest priority for Audi and the entire Volkswagen Group. The reputation of the Group and its brands, the trust of customers and business partners, the wellbeing of employees and the sustainable economic success are based on these two factors. Our aim is to ensure that the latter is not impaired by the risk of serious material damage resulting from fines, deductions on profit and compensation obligations or criminal proceedings. For this reason, Audi Hungaria Zrt. has established a whistleblower system, in which the data provided by you during the report is managed as follows.

Audi Hungaria Zrt. (address: 9027 Győr, Audi Hungária street 1., corporate registration number: 08-10-001840) (hereinafter referred to as "data controller") handles the personal data included in the report or arisen during the investigation according to this information ("Information").

At Audi Hungaria, we ensure the protection of your personal data and we respect your right to information self-determination. Audi Hungaria treats personal data confidentially and takes all necessary security, technical and organizational measures to ensure the security of the data.

## 1. General provisions

### Data of Audi Hungaria as data controller, contact details of the Data Protection Officer and the Compliance Officer

**Name of data controller:** Audi Hungaria Zrt.

**Seat:** 9027 Győr, Audi Hungária street 1.

**Corporate registration number:** 08-10-001840

**Compliance Officer:** Dr. Johannes, Freiler-Waldburger, Compliance Officer AUDI HUNGARIA Zrt., e-mail: [compliance@audi.hu](mailto:compliance@audi.hu)

**Data Protection Officer:** Dr. László András Horváth, e-mail: [adatvedelem@audi.hu](mailto:adatvedelem@audi.hu)

### 1.1 Concepts, principles, related legislation

#### Concepts

**'processing'** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction

**"processor"** means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller;

**'personal data'** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person

### 1.2. Principles

Audi Hungaria, as data controller, is responsible for complying with the following:

- processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency') collected for specified, explicit and legitimate purposes and not further



processed in a manner that is incompatible with those purpose ("purpose limitation");

- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimization') accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ("accuracy")
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed ('storage limitation')
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ("integrity and confidentiality").

### 1.3. Related legislation

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), Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union Law and Act CXII of 2011 on the right to informational self-determination and on the freedom of information, and Act XXV of 2023 on complaints, reports of public interest and rules related to reporting of misuses.

## 2. Scope of personal data processed by Audi Hungaria and purpose of data processing

**Purpose of data processing:** the aim of the Audi whistleblower system is to investigate, detect and eliminate potential violations reported through the whistleblower system.

**Legal basis of data processing:** your personal data is managed in accordance with Act XXV of 2023.

**Scope of personal data processed:** the data that form the content of the report and the data of the whistleblower, respectively data of the person whose behaviour or omission are the reason for the report and the data of the person who may have relevant information about the contents of the report which may include, among other things, the name, contact details, other personal data provided in the report.

**Duration of data processing:** the data that constitute the content of the report and the data of the whistleblower will be deleted as defined in Act XXV of 2023 on Complaints, reports of public interest and rules related to the reports of abuses:

Personal data which are not relevant for the investigation of the report will be deleted immediately.

Retention period of data related to the report given in the electronic system, the investigation carried out on the basis of the report and measures – for the protection of the whistleblower and for the subsequent justification of the measures taken in his/her favour - is five years from the end of the last investigative act or measure, after which the data will be deleted.

### Persons entitled to access the data:

For all notifications, AUDI HUNGARIA Zrt. is considered controller.

The following are authorized to access the managed data:



The competent employees of the department Integrity / Compliance / Risk Management who receive the reports and the competent employees of the investigating units of Audi Hungaria (HR, Security Management, Revision, resp. other specialties suitable for investigation) and in the case of reports, that refer to significant concern-level problems the competent employees of the department Integrity / Compliance / Risk Management of Audi AG.

In the case of reports that refer to a significant concern-level problem, i.e. as a result of which at least two Group companies are affected and the problem can only be solved with a cross-border uniform concept at Group level, it is necessary to forward the report to Audi AG. Based on the statement of the European Commission on 2.6.2021, the report can, as a general rule, be forwarded with the consent of the whistleblower in such case. The report and the related personal data, if possible, will be forwarded to Audi AG in anonymized form. If the whistleblower's personal data cannot be transmitted in an anonymous form because the investigation also requires the identification of the whistleblower, then the whistleblower's personal data may be forwarded to Audi AG based on the whistleblower's consent. If the whistleblower does not consent to this data management, the whistleblower can make a separate report individually at the competent body in the Audi AG.

In the case of anonymous reports that indicate a significant concern-level problem, by making the report, the whistleblower agrees that the contents of the report may be forwarded to Audi AG for further processing.

In the cases described above, the data provided by you are handled jointly by Audi Hungaria Zrt. and AUDI AG (address: 85045 Ingolstadt) in accordance with the this Information.

### **3. Data protection rights and remedies**

**Your rights:** In the respect of your personal data processed by Audi Hungaria you have the right to

- (a) access to personal data;
- (b) request correction of personal data ('right to rectification');
- (c) request the deletion of personal data ('right to be forgotten');
- (d) request a restriction on the processing of personal data ('right to restriction of processing');
- (e) object to the processing of your personal data;
- (f) receive the personal data and transmit it to another data controller if the legal preconditions for this are met ('right to data portability');
- (g) if the processing of personal data is carried out on the basis of your consent, you may withdraw your consent at any time.

You may submit your request for the exercise of above mentioned rights to the contact details indicated above. Audi Hungaria shall provide information on the measures taken in response to the request without undue delay, but usually within 30 days of receipt of the application. If you do not agree with the response or action of Audi Hungaria, you have remedies at your disposal.

**Remedy:** If you do not agree with Audi Hungaria's response or action, you can complain to the Hungarian National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság, address: 1055 Budapest, Falk Miksa street 9-11.; phone: +36 1 391 1400; fax: +36 1 391 1410; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), web: [www.naih.hu](http://www.naih.hu)) or go to competent court.