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	Ethics Hotline - Annex 2		Amended: 2026/07/23

Annex to ALPINE Kft.'s Whistleblowing Policy
Information for the Reporting Person on Personal Data Protection
Data Processing Notice
concerning the processing of personal data that are strictly necessary within the framework of the
internal Whistleblowing System

1. Data Controller

- **Data Controller: Alpine Európai Elektronikai Ipari Kft.**
- **registered office: 2051 Biatorbágy, Vendel Park, Budai utca 1.**
- **represented by: Zsolt Demeter, Managing Director**
- **e-mail: adatvedelem@alpine.hu**

(hereinafter referred to as the "Data Controller")

2. Processing of personal data that are strictly necessary within the framework of the internal whistleblowing system (hereinafter: Whistleblowing System)

Within the Whistleblowing System, information may be reported concerning an unlawful act or omission, an act or omission suspected to be unlawful, or other misconduct. You, as the reporting person, may submit a report in writing or orally. Within the internal whistleblowing system, we process the personal data of the reporting person, the personal data of the person whose conduct or omission gave rise to the report, and the personal data of any person who has material information in relation to the report. Any other personal data processed in the reporting system that do not fall within the foregoing categories are deleted without delay.

Legal basis for processing: compliance with a legal obligation [Article 6(1)(c) of the General Data Protection Regulation]. Pursuant to Act XXV of 2023 on complaints, public-interest disclosures and rules relating to the reporting of misconduct, we are required to investigate and handle the report.

Purpose of processing: solely to investigate the report and to remedy or bring to an end the conduct that is the subject of the report.

Duration of processing: the data are retained until the purpose specified above has been achieved.

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Categories of recipients: the reporting person's personal data may be transferred only to a state body or authority competent to conduct proceedings initiated on the basis of the report, provided that such state body or authority is authorised by law to process those data, or where the reporting person has consented to the transfer of the data. The reporting person's personal data may not be made public without the reporting person's consent. If it becomes evident that the reporting person has, in bad faith, communicated false data or information, the reporting person's personal data must, upon request, be transferred to the body or person authorised to initiate or conduct the relevant proceedings.

Transfer to a third country or international organisation: such transfer may take place only where there is a legal obligation to do so and with due regard to the requirements governing the protection of personal data.

3. Rights of the Reporting Person

In connection with the processing of your personal data, you have the rights detailed in Sections 3.1 to 3.4 below. If you wish to exercise any of these rights, please send your request to us using one of the following contact details:

- **Address:** 2051 Biatorbágy, Vendel Park, Budai utca 1.
- **E-mail address:** adatvedelem@alpine.hu

Identification

Before fulfilling your request, we must in every case verify your identity. If we are unable to identify you, we will be unable to fulfil your request.

Responding to the request

Following identification, we will provide information concerning your request in writing, electronically or, at your request, orally. Please note that if you submitted your request electronically, we will respond electronically. You may, of course, request another method of response in such a case as well.

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Time limit for handling requests

Within 1 (one) month of receipt of your request, we will inform you of the action taken in response to your request. Where necessary, taking into account the complexity and number of requests, this period may be extended by a further 2 (two) months; we will inform you of such extension within the initial 1 (one)-month period.

We are also required to inform you within the one-month time limit if no action is taken. You may lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (Section 4.1) and exercise your right to a judicial remedy (Section 4.2).

Fee for handling requests

The requested information and action are provided free of charge. An exception applies where the request is manifestly unfounded or excessive, in particular because of its repetitive character. In such a case, we may charge a fee or refuse to act on the request.

3.1. You may request information and access

You may request information as to whether your personal data are being processed and, if so:

- What is the purpose?
- Exactly which data are being processed?
- To whom are these data transferred?
- For how long do we store these data?
- What rights and remedies do you have in this regard?
- From whom did we obtain your data?
- Do we make any automated decision concerning you using your personal data? In such cases, you may also request information about the logic (method) applied and about the significance and envisaged consequences of such processing.
- If your personal data have been transferred to an international organisation or to a third country (a country that is not a Member State of the European Union), you may request information demonstrating the safeguards that ensure the appropriate processing of your personal data.

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- You may request a copy of the personal data being processed. (For any further copies, we may charge a reasonable fee based on administrative costs.)

3.2. You may request rectification

You may request that we correct or complete your personal data that have been recorded inaccurately or incompletely.

3.3. You may request erasure of your personal data (the "right to be forgotten")

You may request that we erase your personal data where:

- the personal data are no longer necessary in relation to the purposes for which they were processed;
- the processing is carried out solely on the basis of your consent;
- your objection is successful;
- it is established that the personal data are being processed unlawfully;
- erasure is required by European Union or Hungarian law.

We may not erase personal data where they are necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation under European Union or Member State law applicable to the Data Controller which requires processing of personal data, or for reasons of public interest;
- for reasons of public interest in the area of public health;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, where erasure is likely to render impossible or seriously impair such processing; or
- for the establishment, exercise or defence of legal claims.

3.4. You may request restriction of processing

You may request that we restrict processing where one of the following applies:

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- you contest the accuracy of the personal data, in which case the restriction applies for the period necessary for us to verify the accuracy of the personal data;
- the processing is unlawful, but you oppose the erasure of the data and request the restriction of their use instead;
- we no longer need the personal data for the purposes of processing, but you require them for the establishment, exercise or defence of legal claims;
- you have objected to processing; in this case, the restriction applies pending verification of whether the legitimate grounds of the Data Controller override your legitimate grounds.

Where processing has been restricted, such personal data may, with the exception of storage, be processed only with your consent, for the establishment, exercise or defence of legal claims, for the protection of the rights of another natural or legal person, or for reasons of important public interest of the European Union or of a Member State. We will inform you in advance before any restriction is lifted.

4. Remedies

4.1. You may lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information

If you consider that the processing of personal data relating to you infringes the General Data Protection Regulation, you are entitled to lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information.

Hungarian National Authority for Data Protection and Freedom of Information

- President: Dr Attila Péterfalvi
- Postal address: 1363 Budapest, P.O. Box 9.
- Address: 1055 Budapest, Falk Miksa utca 9-11.
- Telephone: +36 (1) 391-1400
- Fax: +36 (1) 391-1410
- Website: <http://naih.hu>
- E-mail: ugyfelszolgalat@naih.hu

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4.2. You may seek judicial remedy

If you consider that the processing of personal data relating to you infringes the General Data Protection Regulation and thereby violates your rights under the General Data Protection Regulation, you are entitled to seek judicial remedy.

The action falls within the jurisdiction of the regional court. At the data subject's option, the proceedings may also be brought before the regional court having jurisdiction over the data subject's place of residence or stay. A person who otherwise lacks legal capacity to be a party to proceedings may also be a party in such proceedings. The Authority may intervene in the proceedings in support of the data subject's success.

In addition to the provisions of the General Data Protection Regulation, the provisions of Book Two, Part Three, Title XII (Sections 2:51 to 2:54) of Act V of 2013 on the Civil Code, together with other statutory provisions governing court proceedings, shall apply to the judicial proceedings.

4.3. Damages and Compensation for Non-Material Harm

If the Data Controller causes damage by unlawfully processing the data subject's data, or infringes the data subject's personality rights, compensation for non-material harm may be claimed from the Data Controller. The Data Controller is exempt from liability for the damage caused and from the obligation to pay compensation for non-material harm if it proves that the damage or infringement of the data subject's personality rights was caused by an unavoidable event outside the scope of the data processing.

5. Data Security

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

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We always process personal data confidentially, with restricted access and encryption, while maximising resilience to the extent possible and ensuring the ability to restore availability in the event of an incident. We regularly test our systems in order to ensure security. When determining the appropriate level of security, we take into account risks arising from processing, in particular those arising from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

We take all measures necessary to ensure that persons acting under our authority who have access to personal data process such data only on our instructions, unless European Union or Member State law requires them to do otherwise.

As physical security measures, we use access-control and camera systems. Logical security measures include the following: firewalls; anti-virus and security software (protection of workstations and file servers, device control, application control, patch management, Windows Server Update Services); software updates; backups; access controls; automatic locking of devices; encryption of portable devices; and secure remote access through a Virtual Private Network connection. For the website, Secure Sockets Layer encryption is used.

6. Miscellaneous

The Data Controller is entitled to amend the provisions of this Data Processing Notice at any time.

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