

Notification on the processing of personal data within the framework of the Whistleblower System

With reference to the provisions of Article 6 and Chapter III of the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter: GDPR) and furthermore the provisions of Sections 18-29 and 41-49 of Act XXV of 2023 on complaints, notifications of public interest and rules on the notification of abuse (hereinafter: Complaints Act), Mercedes-Benz Manufacturing Hungary Kft. (seat: H-6000 Kecskemét, Mercedes út 1., company registration number: Cg. 03-09-119767, company registration court: the Kecskemét Regional Court acting as Company Registration Court, hereinafter: Company) as data processor informs the data subjects on the processing of personal data of notifiers and persons involved in the notification procedure (hereinafter: data subjects) as follows:

I. Legal basis for the processing

The legal basis for the processing is compliance with the legal obligation prescribed in paragraph c) of Section (1) of Article 6 of the GDPR, which obligation is included in Section 18 of the Complaints Act that prescribes the establishment of operation of a Whistleblower System for the Company.

II. Purpose of processing

The purpose of processing is compliance with the provisions of Section 26(1) of the Complaints Act, that is the investigation of the notification, the remedy of the conduct subject to the notification or the termination thereof.

III. The scope of data subjects and of the data processed

Data subjects: the notifier, the person whose conduct or failure of act gave rise to the notification and the person who has material information on the contents of the notification.

The scope of processed data: in order to investigate the notification of data subjects it is indispensable to acquire personal data (in each case according to the specific notification, such as – among other data – name, phone number, e-mail address, internal personal number, position etc.).

IV. Persons authorised to control and process data

We hereby inform you that the Company has authorized Mercedes-Benz Group AG with the operation of its Whistleblower System. Mercedes-Benz Group AG shall be entitled to the processing of any and all personal data indicated in **Section III** for purposes defined in **Section II** within the same scope as the data processor Company.

If, on the basis of a notification on data breach, the data controller and its agent need to carry out investigative measures in the course of a preliminary investigation, or if the notification raises the possibility of a criminal offence, the competent investigative authorities shall be involved, in which case the personal data concerned by the notification shall be disclosed to the authority(ies). The proceeding authorities shall be deemed individual processors, and the legal basis for the disclosure of data may be – depending on the given case – compliance with a legal obligation as prescribed by GDPR Article 6(1)c) or the protection of a legitimate interest pursuant to paragraph d) of the same article, or for the purposes of the legitimate interests pursued by the controller as per paragraph f) of the same article.

If it is established that the notifier has communicated false data or information in bad faith, and that there are indications that a criminal offence or misdemeanour has been committed, his or her personal data will be disclosed to the body or person responsible for the procedure.

V. Duration of data processing

We hereby inform you that your personal data are stored by the Company until the achievement of the objective set forth in Section II, and until the end of the limitation period open for subsequent enforcement of rights.

VI. Processing methods and data security measures

In the internal Whistleblower System the personal data of the notifier who discloses his or her identity and of the person concerned by the notification shall not be accessible to any other person than the authorised parties, other than the investigators. Until the conclusion of the investigation or until formal prosecution is initiated as a result of the investigation, the person responsible for the procedure may only disclose information on the contents of the notification and on the person involved in the notification – in addition to informing the person concerned by the

notification – to the employer's other organisational units or employees to the extent that is absolutely necessary for conducting the investigation.

The provisions hereof shall also apply to any person who has material knowledge on the information contained in the notification.

VII. Rights of the data subject

As data subject you shall have the right to:

- Request information from the Company about personal data and information stored about you. (Article 15 of the GDPR - right of access)
- Request the Company to correct incorrect personal data concerning you and, if necessary, to complete incomplete personal data. (Article 16 of the GDPR - right to rectification)
- In certain cases, request the Company to delete personal data concerning you. (Article 17 of the GDPR - right to erasure)
- Restrict the processing of personal data concerning you by the Company. (Article 18 of the GDPR - right to restrict processing)
- To obtain the personal data that you provided, from the Company, in machine-readable electronic format and to request their disclosure. (Article 20 of the GDPR - right to data portability)
- To object to the processing of your personal data by the Company if it is necessary for the performance of a task carried out in the exercise of official authority or for the purposes of the legitimate interests pursued by the controller. (Article 21 of the GDPR - right to object)

VIII. Legal remedies

Upon your request, the Company will inform you in writing, within a maximum of 25 days, whether we store personal data relating to you, and if so, which data and under what conditions. If, despite our efforts to ensure that the information is correct and up to date, we store incorrect information, we will correct it at your request.

If the Company processes your data in order to comply with legal obligations to which it is subject or in order to pursue a legitimate interest, you may object to the processing by contacting the Company using the contact details indicated above. Should you have any complaint, please contact our Company first for each occasion, we will be at your service.

Please be informed that if your rights are infringed in any manner whatsoever in conjunction with processing carried out by us, you can report it to the Hungarian National Authority for Data Protection and Freedom of Information at the contact details under **Section X**.

Please note that if your rights are infringed and your objection is rejected, you may bring the case before a court vis-à-vis the controller. The Court shall give priority to the case, and the regional court has jurisdiction to hear the case. The lawsuit can be brought either before the Kecskemét Regional Court at the contact details under **Section X**, or at the court having jurisdiction where your permanent residence or temporary residence is located.

If you wish to announce a personal data breach, you can do so at the following contact options.

E-mail: cyber.security@mercedes-benz.com; Phone: +49 711 17 76758.

A personal data breach is a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored or otherwise processed.

We also inform you that no Data Protection Officer has been appointed at our Company under the provisions of the law. The competent Data Protection Officer for the Company is the Data Protection Officer of Mercedes-Benz Group AG: Sebastian GRESS.

IX. Miscellaneous provisions

If the notification concerns a natural person, the notifier's personal data shall not be disclosed to the person requesting the information when the natural person exercises their right to be informed and their right to access pursuant to the regulations on the protection of personal data.

The transfer of data processed within the limits of the Whistleblower System to a third country or an international organisation shall only take place insofar as the recipient of the transfer undertakes a legal obligation to comply with the rules on reporting set forth in the Complaints Act, in line with the regulations on the protection of personal data.

Please note that the Company shall take technical and organisational security measures to protect your data. We take preventive measures to avoid manipulation, loss, damage and unauthorised access to the data processed. Security measures are continuously improved by the Company in line with the available technical advancements.

Please also note that our data processing activities are registered in accordance with the provisions of the GDPR.

X. Addresses, contact details

Hungarian National Authority for Data Protection and Freedom of Information address: H-1055 Budapest Falk Miksa utca 9-11. E-mail: ugyfelszolgalat@naih.hu Telephone: +36 (1) 391-1400, Fax: +36 (1) 391-1410,	Mercedes-Benz Manufacturing Hungary Kft. address: 6000 Kecskemét, Mercedes út 1.
Kecskemét Regional Court address: 6000 Kecskemét, Rákóczi út 7., postal address: 6001 Kecskemét, POB: Pf.12., E-mail address: birosag@kecskemetit.birosag.hu , central phone number: +36 76 519 519	✓ Act CXII of 2011 on the right to information self-determination and freedom of information ✓ Regulation (EU) 2016/679 of the European Parliament and of the Council 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)