

PRIVACY NOTICE

- on the Processing of Personal Data of Persons Using the Internal Whistleblowing Reporting System -

1. Details of the Data Controller:

Name	Y Diák Iskolaszövetkezet
Registered seat	1137 Budapest, Radnóti Miklós u. 2.
Company registration number	01-02-054614
Tax number	24146443241
E-mail address	dmp@dmp.hu

2. Purpose, Scope, Legal Basis and Duration of the Processing of Personal Data

<i>Purpose of Processing</i>	The purpose of the processing of personal data is to enable the Data Controller to receive, assess and investigate Reports submitted through the Internal Whistleblowing Reporting System and to take any necessary measures to remedy or terminate the conduct forming the subject matter of the Report, in compliance with its legal obligations under Act XXV of 2023 on Complaints, Public Interest Disclosures and the Rules Relating to the Reporting of Abuses.
<i>Categories of Personal Data Processed</i>	Within the framework of the Internal Whistleblowing Reporting System, the personal data of the Reporting Person, the Person Concerned whose act or omission gave rise to the Report, and any person who may possess material information relating to the matters set out in the Report, to the extent strictly necessary for the assessment and investigation of the Report. Such personal data are primarily provided by the Reporting Person.
<i>Legal Basis for Processing</i>	Compliance with a legal obligation (Article 6(1)(c) of the GDPR and Section 26 of Act XXV of 2023 on Complaints, Public Interest Disclosures and the Rules Relating to the Reporting of Abuses).
<i>Retention Period</i>	Until the Report has been concluded and any necessary follow-up measures have been completed or, where applicable, until the expiry of the limitation period for the enforcement of legal claims, but in any event no longer than five (5) years from the date on which the Report was submitted.

3. Use of a Data Processor

No external data processor is involved in the operation of the Internal Whistleblowing Reporting System.

4. Transfer of Personal Data

The Data Controller may disclose personal data to the following recipient:

- Service provider entrusted with the operation of the Cooperative's Internal Whistleblowing Reporting System

Name: Dr. Péter Miklós

E-mail: dmp@dmp.hu

Telephone: +36 30 648 5521

The Data Controller does not transfer personal data to any data controller established in a third country.

5. Persons Authorised to Access Personal Data

Within the Data Controller's organisation, personal data shall be processed exclusively by the Operator of the Internal Whistleblowing Reporting System, solely to the extent necessary for the performance of their duties relating to the operation of the Internal Whistleblowing Reporting System.

6. Fundamental Data Security Measures

The Data Controller shall process personal data with the utmost care, in strict confidence and only to the extent necessary. Where processing is based on consent, personal data shall be processed in accordance with any instructions given by the person providing such consent.

The Data Controller is committed to ensuring the secure processing of personal data and has therefore implemented the technical and organisational measures, as well as the internal procedures, necessary to ensure compliance with the applicable data protection legislation. The Data Controller regularly reviews these measures and procedures and, where necessary, updates them accordingly.

7. Your Rights and the Exercise of Your Rights

<i>Right to Obtain Information</i>	You have the right to request information regarding the personal data processed by the Data Controller. In such case, the Data Controller shall inform you of the personal data processed concerning you, the purposes of the processing, the retention period, your rights in relation to the processing, and your right to lodge a complaint with the National Authority for Data Protection and Freedom of Information (NAIH).
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Please note that where a Report concerns a natural person, the Reporting Person's personal data shall not be disclosed to the person requesting information in the course of exercising that natural person's rights to information and access under the applicable data protection legislation.

<i>Right to Obtain a Copy</i>	You have the right to request a copy of the personal data processed by the Data Controller. In such case, the Data Controller shall provide a copy of the personal data processed concerning you to the contact details specified by you (e-mail address or postal address).
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<i>Right to Rectification</i>	to	Upon your request, the Data Controller shall rectify or update your personal data or, where applicable, record the new personal data provided by you.
<i>Right to Withdraw Consent</i>		Where the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
<i>Right to Erasure</i>		You may request the erasure of your personal data by contacting the Data Controller using the contact details provided above. The Data Controller may refuse such request only in the cases provided for by the GDPR.
<i>Right to be Forgotten</i>	to be	Where the Data Controller has made your personal data public and is required to erase such data, it shall take all reasonable steps to inform other data controllers processing the personal data that you have requested the erasure of any links to, or copies or replications of, those personal data.
<i>Right to Restriction of Processing</i>		ou have the right to request the restriction of the processing of your personal data where - the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead; - the Data Controller no longer needs the personal data for the purposes of the processing, but you require the personal data for the establishment, exercise or defence of legal claims. When exercising your right to restriction of processing, you must specify the grounds on which you request the restriction. Where the request is granted, the Data Controller shall ensure that the personal data subject to restriction are stored separately from all other personal data. For example, electronic records shall be stored on a separate storage medium, while paper-based records shall be kept in a separate file.
<i>Right to Data Portability</i>		You have the right to receive your personal data in a structured, commonly used format (including, in particular, PDF or DOC format) and to transmit those data to another data controller. You may also request that the Data Controller transmit your personal data directly to another data controller, where technically feasible.

The Data Controller shall respond to your request within one (1) month of its receipt. Where necessary, this period may be extended by a further two (2) months.

If the Data Controller refuses your request, it shall inform you, within one (1) month of receiving the request, of the reasons for the refusal and of your right to lodge a complaint with the supervisory authority and to seek a judicial remedy.

Where the Data Controller has reasonable doubts concerning the identity of the person submitting the request, it may request the provision of additional information necessary to confirm the identity of the data subject. This may be the case, in particular, where the data subject exercises the right to obtain a copy of their personal data, in which case the Data Controller is entitled to verify that the request has been submitted by the person concerned.

8. Remedies

To exercise your rights in relation to the processing of your personal data, you may contact the Data Protection Officer of the Data Controller using the contact details provided above. You may submit your request or complaint in writing, electronically or in person, in which case a written record shall be taken. The Data Protection Officer shall assess and examine your request or complaint on the basis of its content within thirty (30) days.

National Authority for Data Protection and Freedom of Information (NAIH) to initiate an official procedure to examine the lawfulness of the Data Controller's processing activities, or where you consider that the processing of your personal data does not comply with the applicable legal requirements.

National Authority for Data Protection and Freedom of Information (NAIH)

Postal address: 1363 Budapest, P.O. Box 9.

E-mail: ugyfelszolgalat@naih.hu

You also have the right to bring legal proceedings before the competent court if you consider that the Data Controller has infringed the applicable data protection legislation in the course of processing your personal data or has caused you damage as a result of unlawful processing.

Dated: Budapest, 26 May 2026

Y Diák Iskolaszövetkezet