PRIVACY STATEMENT RELATED TO THE WHISTLEBLOWING SYSTEM

This privacy statement aims to provide you with an overview of how ENEOS MOL Synthetic Rubber Ltd. (hereinafter: "EMSR" or "controller") **manages your personal data within its whistleblowing system (SpeakUp!)**, in accordance with 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; "GDPR"), and Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

Data Controller

The Data Controller is ENEOS MOL Synthetic Rubber Ltd. (registered seat: 1117 Budapest, Dombóvári út 28.; website: www.emsr.hu; email address: contact@emsr.hu).

Data Protection Officer

If you have any questions about the processing of your personal data or wish to exercise your rights, please contact our Data Protection Officer (Dr. Róbert Szűcs) at dpo_EMSR@emsr.hu.

Access to personal data

The documents generated during the reporting and subsequent investigation may contain personal and special categories of personal data relating to natural persons.

> **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.
> **Special categories of personal data:** personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic and biometric data processed for the purpose of uniquely identifying a natural person, data concerning health, and data concerning a natural person's sex life or sexual orientation.

Your personal data will be treated confidentially within the framework of the whistleblowing system. Our system is designed to ensure that the personal data of the whistleblower who discloses his or her identity and of the person who is the subject of the whistleblowing report is not disclosed to anyone other than the authorized person.

The following persons are entitled to access the report, the investigation, and the decision on a "need to know" basis:

- chairman of Ethics Council;
- members of the Ethics Council;
- the person making the notification (Whistleblower/Reporter);
- a person suspected of committing abuse (Reported);
- employees participating in the investigation of the case and contributing to it with information and professional support (including the manager exercising employer authority over the Reported Party), to the extent absolutely necessary for their cooperation.

Data transfer

We may transfer your personal data to third parties (e.g., courts, authorities, etc.) if necessary for the conduct of judicial or administrative proceedings and if we have the appropriate legal basis to do so.

In the course of the management of a specific whistleblowing report and the related investigation, personal data may be transferred to the parent companies or a third party involved in the case, solely for the purposes of investigating and solving the case and only to the extent necessary to follow up on the legal consequences, while maintaining the safeguards (preservation of anonymity, strictly limited access to the details of the case within the individual companies, etc.) granted during the whistleblowing procedure. The recipients of such transfers of data are considered to be controllers.

Where necessary for handling a case, to the required extent, personal data (for e.g. information necessary to clarify the facts, investigation documents, etc.) may be transferred to a third country. In such a case, the controller shall comply at all times with the provisions of Chapter V of the GDPR.

Data processor(s)

We use the services of the assigned companies as our data processor for the purposes of data processing detailed above.

Detailed description of the data processing

Description and purpose of the data processing	Legal basis of the data processing	Scope and source of the processed personal data	Duration of the data processing	Recipient of data transfers	Processor and its processing activity
Operating a whistleblowing system, investigations of complaints and reports, consequence management	In the case of a company employing at least 50 persons in the framework of a legal relationship aimed at employment, the data processing is in order to fulfill legal obligation based on Article 6(1)(c) and Article 9(2) (g) of GDPR. The legal obligation is based on XXV of 2023 law on complaints, reports in the public interest, and rules related to reporting abuses (hereinafter: Whistleblower Act) Section 18 (1).	Your personal data is obtained directly from you. In case of not anonymous report: – Personal data of the Report (name, e-mail, address, phone number). – Personal data of the person against whom the whistleblowing report was made and of any other data subject possessing relevant information regarding the case (for example witness). – Content of the whistleblowing report; any other personal data provided in the description. In case of anonymous report: – Personal data of the person against whom the whistleblowing report was made and of any other data subject concerned by the whistleblowing. – Content of the whistleblowing report; any other personal and sensitive data provided in the description.	Where, based on the investigation, a report is unfounded or no further action is required, any data relating to the report should be erased within 60 days of the completion of the investigation. If a measure is taken based on the investigation - including the initiation of a legal procedure or a labor law consequence against the Reporter - the data related to the report can be processed within the framework of the reporting system: for 3 years, in case of an employee, based on Section 286 (1) of the Hungarian Labor Code, in other cases, for 5 years, based on the Hungarian Civil Code 6:22 Section (1). If a measure is taken based on the investigation – including the initiation of a legal procedure or a labor law consequence against the Reporter – the data related to the report may be processed within the framework of the reporting system until the final conclusion of the proceedings initiated on the basis of the report.	– Parent companies involved in the investigation; – whistleblower protection legal counsel or – other external persons and organisations. According to Act XXV of 2023 on Complaints and Public Interest Disclosures, and on the Rules of Whistleblowing Notifications Section 6 (4) If determined beyond doubt that the complainant or the whistleblower has provided false data or information in bad faith, and a) it gives rise to an indication that a crime or an infraction was committed, the personal data of such person shall be handed over to the body or person entitled to carry out proceedings, b) where it is likely that the complainant or the whistleblower caused unlawful damage or other harm to the rights of others, his or her personal data shall be handed over upon request to the body or person entitled to initiate or carry out proceedings.	KMAK Kelet-Magyarországi Adatközpont Szolgáltató Kft. Takes care of the operation of the website, including the whistleblower interface. Servergarden Kft. Operates the server hosting. MOL IT & Digital GBS Kft. Provides cyber security. The system sends an automatic notification to SpeakUp_EMSR@emsr.hu; only members of the Ethics Council has access to this electronic mailbox.
Legal claims related to the complaint or report asserted by the data controller or the data subject	GDPR Article 6 (1) point f) - data management is necessary to assert the legitimate interests of the data controller. Legitimate interest: legal enforcement on the part of the data controller based on Article 17 (3) e) of the GDPR or successful defense in a possibly initiated legal dispute or official procedure (e.g. court proceedings initiated by the data subject, official or out-of-court proceedings, etc.). Upon individual request, additional information about the conducted interest assessment tests can be provided.	As defined above.	As defined above.	The recipients of the data transfer may be courts and authorities involved in the procedure.	As defined above.

Automated decision-making, including profiling

No automated decision-making takes place in the course of the processing.

Data subject rights

You have the following data subject rights:

Right to information:
Where the controller processes personal data concerning you, it must provide you information concerning the data relating to you – even without your special request to that effect – including the main characteristics of the data processing, such as the purpose, legal basis and duration of the processing, the name and address of the controller and its representative, the recipients of the personal data (in case of data transfer to third countries indicating also the appropriate or suitable safeguards), the legitimate interests of the controller and/or third parties in case of a data processing based on a legitimate interest, furthermore your data protection rights and your possibilities of seeking a legal remedy (including the right of lodging a complaint with the supervisory authority), where this information is not yet available to you. The controller provides you the abovementioned information by making this privacy notice available to you.

Right of access:
You have the right to obtain from the controller confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and certain information related to the data processing such as the purpose of the data processing, the categories of the personal data processed, the recipients of the personal data, the (scheduled) duration of the data processing, the data subject's data protection rights and possibilities of seeking a legal remedy (including the right of lodging a complaint with the supervisory authority), furthermore information on the source of the data, where they are collected from the data subject. Upon your request, the controller shall provide you with a copy of your personal data undergoing processing. For any further copies requested by you, the controller may charge a reasonable fee based on administrative costs. The right to obtain a copy shall not adversely affect the rights and freedoms of others. The controller gives you with information on the possibility, the procedure, the potential costs and other details of providing the copy after receiving your request.

Right to rectification:
You have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Right to erasure:
You have the right to obtain from the controller the erasure of personal data concerning you without undue delay and the controller shall have the obligation to erase personal data without undue delay where certain grounds apply or certain conditions are met. Among other grounds, the controller is obliged to erase your personal data at your request if, for example, the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; if you withdraw your consent on which the processing is based, and where there is no other legal ground for the processing; if the personal data have been unlawfully processed; or if you object to the processing and there are no overriding legitimate grounds for the processing; or if the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

Where the processing is based on your consent, consequence of the withdrawal of your consent:
Please note that the withdrawal of your consent shall be without prejudice to any data processing carried out based on you consent prior to the date of such withdrawal.

Right to restriction of processing:
You have the right to obtain from the controller restriction of processing where one of the following applies:

a) the accuracy of the personal data is contested by you, for a period enabling the controller to verify the accuracy of the personal data;
b) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
c) the controller no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims;
d) you have objected to processing, pending the verification whether the legitimate grounds of the controller override your legitimate grounds.

Where the processing has been restricted for any of the above-mentioned reasons, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State You shall be informed by the controller before the restriction of processing is lifted.

Right to data portability:
You shall have the right to receive the personal data concerning you, which you have provided to a controller, in a structured, commonly used and machinereadable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

a) the processing is based on your consent or on the performance of a contract (to which you are a party); and
b) the processing is carried out by automated means.

In exercising your to data portability, you shall have the right to have your personal data transmitted directly from one controller to another, where technically feasible. The right to data portability may not infringe the provisions governing the right to erasure, and may not adversely affect the rights and freedoms of others.

Right to object:
You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on the legitimate interests of the controller, including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

Framework of exercising rights

The data controller will inform you without undue delay, but in any case within one month of the receipt of the request, of the measures taken following the request regarding your rights listed above. If necessary, taking into account the complexity of the application and the number of applications, this deadline can be extended by another two months. The data controller will inform you of the extension of the deadline, indicating the reasons for the delay, within one month of receiving the request.

If the data controller does not take measures following your request, it will inform you without delay, but at the latest within one month of the receipt of the request, of the reasons for the failure to take action, and of the fact that you can file a complaint with the competent data protection supervisory authority (National Data Protection and Freedom of Information Authority; "NAIH") and can exercise its right to judicial remedy.
NAIH contact details:
Address: 1055 Budapest, Falk Miksa street 9-11., postal address: 1373 Budapest, Postbox 9., Tel: +36 1 391 1400, +36 (30) 683-5969 or +36 (30) 549- 6838 Fax: +36-1-391-1410, e-mail: ugyfelszolgalat@naih.hu, website: http://naih.hu/.

If your rights are violated, you can go to court. The lawsuit falls within the jurisdiction of the court. According to the choice of the person concerned, the lawsuit can also be initiated before the court of the place of residence or residence of the person concerned. The court may oblige the data controller to provide information, to correct, restrict or delete the data, to annul the decision made by automated data processing, and to take into account your right to protest. The court may order the publication of its judgment in such a way that the data controller or any other data controller and the violation committed by it can be identified.

You can request compensation from the data controller responsible for damages incurred in connection with illegal data processing (including the failure to take data security measures). If the data controller violates your right to privacy by illegally handling your data or violating data security requirements, you can demand damages from the data controller. The data controller is exempt from liability if it proves that the damage or the violation of the data subject's right to privacy was caused by an unavoidable cause outside the scope of data management. The damage does not have to be compensated and no compensation can be claimed if it resulted from the intentional or grossly negligent behavior of the injured party.