



Data Privacy Information regarding the handling of whistleblowing reports

General

The companies of Deutsche Telekom IT Solutions (DT-ITS) attach great importance to protecting your personal data. It is important to us to inform you what personal data we collect, how your data is processed.

1. **Who is the data controller?** Responsibility for data processing is defined according to the following group of identified or identifiable natural persons (data subjects):

Data subject category	Data controller	Data processor
Deutsche Telekom TSI Hungary Ltd. employees	Deutsche Telekom TSI Hungary Ltd. (head office: H-1097 Budapest, Könyves Kálmán krt. 36.)	DigitalPA S.r.l. (head office Via S. Tommaso d'Aquino, 18A 09134 Cagliari (Italy))
Deutsche Telekom ITTC Hungary Ltd. employees	Deutsche Telekom ITTC Hungary Ltd. (head office: H-1097 Budapest, Könyves Kálmán krt. 36.)	Deutsche Telekom TSI Hungary Kft. (az adatfeldolgozó alvállalkozója: DigitalPA S.r.l. (head office Via S. Tommaso d'Aquino, 18A 09134 Cagliari (Italy))
External, non-employee whistleblower	Deutsche Telekom TSI Hungary Ltd. (head office: H-1097 Budapest, Könyves Kálmán krt. 36.)	DigitalPA S.r.l. (head office Via S. Tommaso d'Aquino, 18A 09134 Cagliari (Italy))

2. **What is the legal ground of data processing?** The data controller shall operate an internal abuse reporting system in accordance with the provisions of Act XXV of 2023 on complaints, whistleblowing and rules relating to the reporting of abuse, which serves as legal ground of data processing (Art. 6, 1. (c) GDPR)
3. **What data is processed, how is it used, and how long is it stored?** Within the framework of the internal abuse reporting system, the personal data of
- a) the whistleblower,
 - b) the person whose conduct or omission gave rise to the report; and
 - (c) the person who may have information relevant to the facts complained of will be processed which are essential for the investigation of the notification.

This data may include: name, e-mail address, postal address, phone number, job title, organisation related information, other type of employee identification.

Personal data outside the scope of the actors referred to in the previous point shall be deleted without delay from the data processed under the internal abuse reporting system.

If the content of the report indicates that its investigation falls outside the scope of Act XXV of 2023 on complaints, whistleblowing and rules relating to the reporting of abuse, the personal data concerned in the notification will be deleted immediately after the determination of the non-investigation and the notification of the notifier.



If the investigation reveals that the notification is unfounded or that no further action is necessary, the personal data relating to the notification will be deleted within 60 days of the completion of the investigation.

If action is taken on the basis of the investigation, including legal proceedings or disciplinary action against the reporting person, the Controller will process the data relating to the report until the legal proceedings based on the report have been finally closed.

4. **Who does the data controller pass my data on to? Does the controller use data processor?** In some cases, it may be necessary to involve external organization, or the Compliance Management in Deutsche Telekom GmbH and share data to conduct the investigation. Furthermore, there is legal obligation to handover data to the state authority on requests, or to the responsible authority in case of legal procedure.

The controller has entrusted DigitalPA S.r.l. (head office Via S. Tommaso d'Aquino, 18A 09134 Cagliari (Italy) data processor to operate the external online reporting channel.

5. **Where is my data processed?** Your data will be processed in European Union, Italy.

6. **Where can I find the information that is important to me?** This data privacy information provides an overview of the processing of your data when handling whistleblowing reports. Further information, including information on data protection in general is available by contacting FMB.TS-ITSH-DataPrivacy@t-systems.com or FMB-HU_DT_ITTC_DataPrivacy@t-systems.com.

7. **What rights do I have?**

You have the right

- a) To request information on the categories of personal data concerned, the purposes of the processing, any recipients of the data, and the envisaged storage period (Art. 15 GDPR);
- b) To request that incorrect or incomplete data be rectified or supplemented (Article 16 GDPR);
- c) To withdraw consent at any time with effect for the future (Art. 7 (3) GDPR);
- d) To object to the processing of data on the grounds of legitimate interests, for reasons relating to your particular situation (Article 21 (1) GDPR);
- e) To request the erasure of data in certain cases under Art. 17 GDPR – especially if the data is no longer necessary in relation to the purposes for which it was collected or is unlawfully processed, or you withdraw your consent according to (c) above or object according to (d) above;
- f) To demand, under certain circumstances, the restriction of data where erasure is not possible or the erasure obligation is disputed (Art. 18 GDPR);
- g) To data portability, i.e., you can receive the data that you provided to us in a commonly used and machine-readable format such as CSV, and can, where necessary, transfer the data to others (Art. 20 GDPR);
- h) To file a complaint about the data processing with the responsible supervisory authority (Hungarian National Authority for Data Protection and Freedom of Information; mailing address: H-1363 Budapest, Pf.: 9., www.naih.hu).