



**Dear Whistleblower,**

integrity and compliance are the basis of our corporate activities, making them the highest priority for Audi and the entire Volkswagen Group. The reputation of the Group and its brands, the trust of customers and business partners, the wellbeing of employees and the sustainable economic success are based on these two factors. Our aim is to ensure that the latter is not impaired by the risk of serious material damage resulting from fines, deductions on profit and compensation obligations or criminal proceedings. For this reason, Audi has established a whistleblower system, in which the data provided during the report is jointly managed.

Audi Hungaria Zrt. (address: 9027 Győr, Audi Hungária street 1., corporate registration number: 08-10-001840) and AUDI AG (address: 85045 Ingolstadt) (hereinafter referred to as "data controllers") jointly handle the personal data provided by you during the report according to this information ("Information").

At Audi Hungaria, we are committed to the protection of your personal data and we consider it of utmost importance to respect your right to information self-determination. Audi Hungaria treats personal data confidentially and takes all necessary security, technical and organizational measures to ensure the security of the data.

**1. General provisions**

**Data of Audi Hungaria as data controller, contact details of the Data Protection Officer and the Compliance Officer**

**Name of data controller:** Audi Hungaria Zrt.

**Seat:** 9027 Győr, Audi Hungária street 1.

**Corporate registration number:** 08-10-001840

**Compliance Officer:** Dr. Gábor Eisenbacher, Compliance Officer AUDI HUNGARIA Zrt., e-mail: [compliance@audi.hu](mailto:compliance@audi.hu)

**Data Protection Officer:** Dr. László András Horváth, e-mail: [adatvedelem@audi.hu](mailto:adatvedelem@audi.hu)

**1.1 Concepts, principles, related legislation**

**Concepts**

**‘processing’** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction

**"processor"** means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller;

**‘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

**1.2. Principles**

Audi Hungaria, as data controller, is responsible for complying with the following:



- processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency') collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purpose ("purpose limitation");
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation') accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ("accuracy")
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed ('storage limitation')
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ("integrity and confidentiality").

### 1.3. Related legislation

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), and Act CXII of 2011 on the right to informational self-determination and on the freedom of information.

## 2. Scope of personal data processed by Audi Hungaria and purpose of data processing

**Purpose of data processing:** The aim of the Audi whistleblower system is to investigate, detect and eliminate potential violations reported through the whistleblower system.

**Legal basis of data processing:** It is in the legitimate interest of the data controller that the whistleblower system should be introduced, as it will enable it to detect, investigate and eliminate violations in a timely manner. This will allow us to avoid possible financial and legal consequences, damage to the company's reputation and to expose weaknesses in processes and structures.

**Scope of personal data processed:** The data that form the content of the notification and the data of the notifier, which may include, among other things, the name, contact details, other personal data provided in the notification.

**Duration of data processing:** The data that constitute the content of the notification and the data of the notifier will be deleted as defined in Act CLXV of 2013 on Complaints and Public Interest Announcements as follows:

If, on the basis of the investigation, the notification is unfounded or no further action is required, the data relating to the notification shall be deleted within 60 days of the end of the investigation.

If, on the basis of the investigation, measures are taken, including measures against the reporting person for the purpose of taking legal proceedings or disciplinary action, the data relating to the report may be processed in the employer's report system until the final closure of the notification proceedings.

### Persons entitled to access the data:

For all notifications, AUDI HUNGARIA Zrt. and AUDI AG are considered joint controllers.



Employee of the department investigating the case, who may include: Audi Investigation Office, Audi AG's investigative specialties for the investigation of serious violations (Revision) (I/GK), the specialties of the Central Legal Department (I/FL), the Audi Safety Organization and the "Special Investigations of the Whistleblower Report System" within the "Integrity, Compliance, Risk Management" (I/GC) department of AUDI AG are responsible for investigations).

Audi Hungaria's investigative specialties (HR, Security Management, Revision, other specialties suitable for investigation) are competent for investigating other violations.

### **3. Data protection rights and remedies**

**Your rights:** In the respect of your personal data processed by Audi Hungaria you have the right to

- (a) access to personal data;
- (b) request correction of personal data ('right to rectification');
- (c) request the deletion of personal data ('right to be forgotten');
- (d) request a restriction on the processing of personal data ('right to restriction of processing');
- (e) object to the processing of your personal data;
- (f) receive the personal data and transmit it to another data controller if the legal preconditions for this are met ('right to data portability');
- (g) if the processing of personal data is carried out on the basis of your consent, you may withdraw your consent at any time.

You may submit your request for the exercise of above mentioned rights to the contact details indicated above. Audi Hungaria shall provide information on the measures taken in response to the request without undue delay, but usually within 30 days of receipt of the application. If you do not agree with the response or action of Audi Hungaria, you have remedies at your disposal.

**Remedy:** If you do not agree with Audi Hungaria's response or action, you can complain to the Hungarian National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa street 9-11.; phone: +36 1 391 1400; fax: +36 1 391 1410; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), web: [www.naih.hu](http://www.naih.hu)) or go to court.