

Whistleblowing policy

1. **Jobsgarden Ltd.** (registered office: 1134 Budapest, Dévai utca 19. 8. floor. 811. door; company number: 01-09-698643; tax number: 12689488-2-41; hereinafter referred to as the "Company") complies with its obligation under Act XXV of 2023 on Complaints, Whistleblowing of Public Interest and Rules for Reporting Abuse (hereinafter referred to as the "Complaints Act") as set out in this Notification, and operates its internal abuse reporting system as follows:

2. Information about illegal or suspected illegal acts or omissions, or other abuse, can be reported to the Reporting System.

3. The internal abuse reporting system is available to the following people (hereinafter referred to as the "Reporting Party"):

a) employed by the Company,

b) an employee who has ceased to be employed by the Company,

c) a person who wishes to establish an employment relationship with the Company and for whom the procedure for the establishment of such a relationship has been initiated,

d) the self-employed person, the individual company, if it has a contractual relationship with the Company,

(e) any person who holds an ownership interest in the Company and any person who is a member of the administrative, management or supervisory body of the Company, including a non-executive director,

(f) a contractor, subcontractor, supplier or person under the supervision and control of a trustee who has initiated a procedure for establishing a contractual relationship with the Company, or who is or has been in a contractual relationship with the Company,

g) trainees and volunteers working for the Company,

h) a person who wishes to enter into a legal or contractual relationship with the Company pursuant to points d), e) or g), and in respect of whom the procedure for the establishment of such legal or contractual relationship has been initiated,

(i) a person whose legal or contractual relationship with the Company as referred to in points (d), (e) or (g) has ceased.

4. How to make and receive a notification:

The Company has entrusted Dr. Nóra Gáldi, a notification protection lawyer (hereinafter referred to as the "Notification Protection Lawyer"), with the duties related to the receipt and handling of the Notifications.

The notification protection lawyer receives notification reports in the following ways:

- By post to "Dr. Gáldi Nóra ügyvéd részére" 1024 Budapest, Rómer Flóris u. 28. III. em. 1.

- By prior appointment in person. Appointments can be made by e-mail at dr.galdi.bejelentes@gmail.com or by phone +36 709 475 473 on Mondays between 10 am and 1 pm.

The notification protection lawyer shall, after having been informed in accordance with the provisions on the protection of personal data, record the notification made in person or orally in a durable and retrievable form, or shall record it in writing and, after providing the possibility to verify, correct or sign it, shall provide or send a copy to the notifier.

The Reporting Protection Lawyer shall keep an accurate record of the written record. In the case of an oral report, the notification protection lawyer must draw the notifier's attention to the consequences of reporting in bad faith, the procedural rules for investigating the report and the fact that his or her identity will be kept confidential at all stages of the investigation.

The Notification Protection Lawyer is obliged to send an acknowledgement to the Notifier within seven days of receipt of the written notification made in the system, and in this context he/she is obliged to provide the Notifier with general information on the procedural and data management rules under the Complaints Act.

Forwarding of notifications to the Company: the Notification Protection Lawyer will send to the Company an extract of the notification containing no data that would allow the identification of the Notifier, unless the Notifier has given his/her prior written consent to the forwarding of his/her personal data.

5. Investigation of the notification

The natural or legal person concerned by the notification will be provided with detailed information on the notification and on the rules applicable to the processing of their personal data when the investigation is opened. The person concerned by the notification may express his or her views on the notification through a legal representative and provide evidence in support of those views. Information under this point may exceptionally be provided at a later stage in duly justified cases where immediate information would frustrate the investigation.

The time taken to investigate the notification shall not exceed 30 days from the date of receipt of the notification. This time limit may be extended in particularly justified cases, after informing the notifier. The notifier will then be informed of the expected date of the investigation and the reasons for the extension. In this case, the time limit for the investigation of the notification shall not exceed three months.

During the investigation, the notification protection lawyer will keep in contact with the notifier, and may invite the notifier to supplement or clarify the facts of the case and to provide further information.

The notification protection lawyer shall inform the notifier in writing of the investigation or non-investigation of the report and the reasons for the non-investigation, the outcome of the investigation of the report, and the action taken or planned. The examination of the notification may be waived if:

- the report was made by an unidentified Reporting Party;
- the notification was not made by the person authorised to do so,
- the notification is a repeat notification by the same notifier with the same content as the previous notification, or
- the harm to the public interest or to an overriding private interest would not be proportionate to the restriction of the rights of the person concerned by the notification resulting from the investigation of the notification.

If it has become apparent that the notifier has provided false information in bad faith and that there are indications that a crime or offence has been committed, the personal data must be handed over to the body or person responsible for the procedure. If there are reasonable grounds for believing that he or she has caused unlawful damage or other legal harm to another person, his or her personal data must be disclosed to the body or person entitled to initiate or conduct the proceedings, at the latter's request.

Information on the handling of reports received by the internal abuse reporting system

Jobsgarden Ltd. (registered office: 1134 Budapest, Dévai utca 19. 8. floor. 811. door; company number: 01-09-698643; tax number: 12689488-2-41; hereinafter referred to as "the Company") processes personal data in connection with the reports received in the internal abuse reporting system in accordance with the provisions of Regulation 2016/679 of the European Parliament and of the Council (hereinafter referred to as "GDPR").

Purpose of the processing:

Investigating a report received by the internal abuse reporting system and remedying or terminating the conduct that is the subject of the report.

Stakeholders:

- the Notifier,
- the person whose conduct or omission gave rise to the notification,
- the person who may have material information about the matters contained in the Notification.

Scope of personal data processed:

Fact of notification, personal data essential for the investigation of the notification.

Legal basis for processing:

Compliance with legal obligation (Article 6 (1) c GDPR) The Company is obliged to investigate the notification under Act XXV of 2023.

Duration of processing:

Personal data not necessary for the investigation will be deleted by the Company without delay. The Company shall delete personal data from the investigation file without undue delay after the investigation has been completed, but within 60 days at the latest, if no further action has been taken on the basis of the investigation.

If action is taken following the investigation of the notification, including legal proceedings or disciplinary action against the notifier, the Company will process the data relating to the notification until the proceedings based on the notification are finally closed.

Who is it addressed to:

Only those persons whose access is indispensable for the investigation and of the notification may have access to the personal data processed by the Company in connection with the notifications.

Except in the case of a bad faith report, the personal data of the notifier may only be disclosed to the body competent to conduct the proceedings initiated on the basis of the report, if such body is entitled to process the data by law or if the notifier has consented to the disclosure of the data.

Data processors:

Jobsgarden Ltd. (registered office: 1134 Budapest, Dévai utca 19. 8. floor. door 811.

Hosting provider: e-distribution Kft.

Mail system: Microsoft Office 365

IT operator: Qualysoft Zrt.

Rights of people concerned:

People concerned may exercise his or her rights in relation to the processing carried out by the Company by contacting:

By post to 1134 Budapest, Dévai utca 19. 8. floor. 811. door. or by e-mail to office@jobsgarden.hu.

The Company shall inform the people concerned of the measures taken in response to the request within 30 days at the latest.

Right of access: the people concerned may request information from the Company about the purposes for which and the means by which his/her personal data are processed, to whom they are disclosed, and may request a copy of the data stored by the Company. In exercising the right to information and access under the Complaints Act, the personal data of the notifier as people concerned may not be disclosed to the person requesting the information.

Right to rectification: the people concerned may request the Company to amend or supplement the personal data recorded.

Right to erasure: the people concerned has the right to request the Company to erase personal data relating to him or her where.

- the data are no longer necessary for the purposes for which they were collected or otherwise processed;
- the people concerned withdraws his or her consent and there is no other legal basis for the processing;
- the people concerned objects to the processing and there are no overriding legitimate grounds for the processing;
- the data have been unlawfully processed; or
- the data must be erased in order to comply with a legal obligation imposed on the

controller.

Right to restriction of processing: the people concerned may request that the Company restricts the processing of his or her personal data if.

- disputes the accuracy of your data
- the data processing is unlawful and the people concerned opposes the erasure of the data

and requests instead the restriction of their use;

- the Company no longer needs the data for the purposes of processing, but the people concerned requires them for the establishment, exercise or defence of legal claims; or
- the people concerned has objected to the processing

The right to object: the people concerned has the right to object at any time, on grounds relating to his or her particular situation, to the processing of his or her personal data necessary for the purposes of the legitimate interests pursued by the Company or a third party. In such cases, the controller may no longer process the data, unless the Company proves that the processing is justified by compelling legitimate grounds which override the interests, rights and freedoms of the people concerned or are related to the establishment, exercise or defence of legal claims.

Right of appeal: If the people concerned considers that the Company has violated the applicable data protection law, he or she may contact the Company using the contact details provided in this notice, and may also lodge a complaint with the National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa u. 9-11, postal address: 1363 Budapest, Pf. 9.; e-mail address: ugyfelszolgalat@naih.hu). The people concerned also has the right to seek judicial appeal, in which case the people concerned may choose to bring the matter to the courts of the place of residence, domicile or registered office of the Company.