



Privacy Notice for the eMAG Whistleblowing Procedure

EMAG Magyarország Limited Liability Company

(Last updated: 28 June 2024 – v1.2)

Summary of the Privacy Notice for the eMAG Whistleblowing System

The purpose of this Privacy Notice summary (“**Privacy Notice**”) is to briefly describe the personal data processing **EMAG Magyarország Limited Liability Company** performs in connection with the operation of the whistleblowing Reporting channels, the investigations of Reporting on alleged misconducts and how we share the personal details and information within eMAG and with third parties (“**Whistleblowing Procedure**”) as described in detail in the [Whistleblowing Policy of EMAG Magyarország Limited Liability Company](#)

Data Controller and the Data Protection Officer	
EMAG Magyarország Limited Liability Company (address: 1097 Budapest, Könyves Kálmán Krt. 34. (LIBERTY Irodaház); email address: data.protection@emag.hu ; hereinafter referred to as “ eMAG ”, “ we ”, “ our ” or “ us ”) acts as data controller when processing your personal data for the purposes described herein below. eMAG has appointed a Group Data Protection Officer, whose contact details you may find in the Full Privacy Notice.	
Purposes and Legal Bases for Processing Your Personal Data	
eMAG processes your personal data for the purposes identified below.	
1.	Operation and Follow-up Actions relating to internal Reporting: we have a legal obligation to process your personal data to operate the internal Reporting channels to allow Whistleblowers to submit their Report. We must also process your personal data to evaluate and follow-up on the Report and to determine whether it is necessary to conduct an investigation. We must also process Whistleblowers’ contact information to obtain further information and clarification, and to provide information regarding the outcome of the investigation.
2.	Conducting investigations: it is our legal obligation to process your personal data to conduct the investigation following Reports that is necessary to establish whether non-compliance occurred and take the necessary corrective steps if needed.
3.	Sharing Reports: eMAG shall keep Whistleblowers’ identity and personal data confidential. eMAG and the Designated Person may only disclose Whistleblowers’ personal data to other persons and departments within eMAG or to other third parties if the Whistleblower explicitly consented to it and to the extent necessary to conduct the investigation.
4.	Secure legal compliance: eMAG has a legitimate interest to share personal data of persons concerned and Whistleblowers who have taken part in the misconduct or have deliberately abused the Whistleblowing Policy with independent external investigation agencies, law firms, competent authorities and courts in order to establish and enforce our claims arising from and to protect our interests in connection with the misconduct substantiated by the investigation, and in order to comply with our legal obligation to Reporting crimes.
Who May Have Access to Your Personal Data?	
eMAG has engaged and designated Orbán Law Office (Orbán Ügyvédi Iroda, address: 1023 Budapest, Veronika utca 4.; e-mail: emag@orbanlaw.hu) a whistleblower protection lawyer in charge with the receipt, registration, review and settlement of Reporting, as well as with undertaking Follow-up Actions who is in charge of the operation of eMAG’s whistleblowing system and conducting investigations. Orbán Law Office acts as an independent data controller and handles all reports with strict confidentiality obligation. In connection with the investigation procedure, we will only share your personal data with our authorised employees (i.e. eMAG’s Investigation Team), service providers, cooperating partners and competent authorities operating inside and outside the territory of the European Union. In that regard, appropriate guarantees have been introduced and we maintain the security of your data.	
Your Rights and Your Right to Object	
Should you wish to exercise your rights below, you may contact us via our contact details that you may find in the section ‘Data Controller and the Data Protection Officer’.	
If the related data processing is based on your consent, then you are free to withdraw your consent any time and we will not continue our data processing activity relative to you. The withdrawal of your consent does not affect the lawfulness of prior data processing.	
You have the right to access, rectify or delete your data, as well as, on certain occasions, to restrict the use of your data, in addition to other rights, and you have the right to data portability as detailed in the Full Privacy Notice.	
You have the right to object to the processing of your personal data for any reason relating to your situation, and in this case, we may not be able to process your personal data and provide our services.	
Full Privacy Notice	
For more information, please refer to our Full Privacy Notice.	



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The purpose of this full Privacy Notice (“**Privacy Notice**”) is to describe the personal data processing **EMAG Magyarország Limited Liability Company** performs in connection with the operation of the whistleblowing Reporting channels, the investigations of Reportings on alleged misconducts and how we share the personal details and information within eMAG and with third parties (“**Whistleblowing Procedure**”) as described in detail in the [Whistleblowing Policy of EMAG Magyarország Limited Liability Company](#).

Please note that this Privacy Notice only covers data processing in connection with Whistleblowing Procedures conducted by eMag. You may find information on the data processing in connection the Whistleblowing Procedures of DANTE INTERNATIONAL SA and other eMAG Group entities in a separate [Privacy Notice](#).

You may find below a short description of the Whistleblowing Procedure, including information about when this Privacy Notice applies to the processing of your personal data:

1. This Privacy Notice applies in case you, an employee, former employee, job applicant, external co-worker, contractor, stakeholder or member of the supervisory board of eMAG (“**Whistleblower**”) decide to submit a Report to Orbán Law Office (Orbán Ügyvédi Iroda, address: 1023 Budapest, Veronika utca 4.; e-mail: emag@orbanlaw.hu) as a “Designated Person” via email, telephone or via physical meeting within or in connection with eMAG (“**Reporting**”). The Designated Person will provide you with a receipt of your Report, upon which it will conduct the investigation procedure, during which they may contact you for further information or clarification in connection with your Reporting. The Designated Person will inform you of the conclusions of the investigation within 30 days, but in all cases no later than 3 months from receipt of your Reporting. The confidentiality of your identity and your personal data will be secured during the investigation; your personal data may only be shared with other departments within eMAG, or other persons if you consented to it or to the extent required by law.
2. This Privacy Notice also applies to you if you are an individual whom the Whistleblower refers to in their Report and your personal data are processed in the Report and during the investigation (“**person concerned**”). Upon opening the investigation, the Designated Person will inform you in detail about the allegations in the Report, your rights in connection with and the terms of the processing of your personal data, and they ensure that you have the opportunity to involve your legal representative, express your views on the Report and to provide evidence on it. Your notification may be postponed in exceptionally justified cases when your immediate notification would prevent the investigation of the Report.
3. Furthermore, this Privacy Notice also applies to you if you are a person possessing relevant information on the alleged misconduct, and the processing of your personal data is indispensable to investigate the Report.

DATA CONTROLLER	EMAG Magyarország Limited Liability Company (address: 1097 Budapest, Könyves Kálmán Krt. 34. (LIBERTY Irodaház); email address: data.protection@emag.hu ; hereinafter referred to as “ eMAG ”, “ we ”, “ our ” or “ us ”) acts as a data controller when processing your personal data for the purposes described herein below.
WHAT IS THE PURPOSE OF PROCESSING THE DATA?	<p>In connection with the operation of the Whistleblowing Procedure, we process your personal data for the following purposes:</p> <ol style="list-style-type: none">1) Operation and Follow-up Actions relating to internal Reporting: we have a legal obligation to process your personal data to operate the internal Reporting channels to allow Whistleblowers to submit their Report. We must also process your personal data to evaluate and follow-up on the Report and to determine whether it is necessary to conduct an investigation. We must also process Whistleblowers’ contact information to obtain further information and clarification, and to provide information regarding the outcome of the investigation.2) Conducting investigations: it is our legal obligation to process your personal data to conduct the investigation following Reports that is necessary to establish whether non-compliance occurred and take the necessary corrective steps if needed.3) Sharing Reports: eMAG shall keep Whistleblowers’ identity and personal data confidential. eMAG and the Designated Person may only disclose Whistleblowers’ personal data to other persons or entities within eMAG or to other third parties if the Whistleblower explicitly consented to it and to the extent necessary to conduct the investigation.4) Secure legal compliance: eMAG has a legitimate interest to share personal data of persons concerned and Whistleblowers who have taken part in the misconduct or have deliberately abused the Whistleblowing Policy with independent external investigation agencies, Hungarian law firms, competent authorities and courts in order to establish and enforce our claims arising from and to protect our interests in connection with the misconduct substantiated by the investigation, and in order to comply with our legal obligation to reporting crimes.

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WHAT PERSONAL DATA WE PROCESS ABOUT YOU?

For the purposes outlined above we process the following categories of personal data:

- A. Personal details:** identity and function of Whistleblowers, persons concerned and persons possessing relevant information on the misconduct; Whistleblowers' contact details.
- B. Details of the Report:** reported facts, any element collected in the verification of the Reported facts.
- C. Details of the investigation:** contents of the Reporting of the investigation, results of the Reporting.

Personal data not relating to a Reporting (i.e., data related to a third person not involved with the Report, or which is unnecessary for the investigation of the Report) or which may not be processed under applicable law will be immediately deleted.

THE LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

To process your personal data, we may rely on the following legal bases:

- Your **consent** pursuant to the GDPR Article 6(1)(a) ("**Consent**").
If the related data processing is based on your consent, then you are free to withdraw your consent any time and we will not continue our data processing activity relative to you. The withdrawal of your consent does not affect the lawfulness of prior data processing.
- To comply with our **legal obligation** under the GDPR Article 6(1)(c) to establish and operate an internal whistleblowing Reporting channel and investigate eventual non-compliance stemming from Sections 18 (1) and 22(2) of the Act XXV of 2023 on complaints, disclosures in public interest, and related rules on reporting abuses in transposition of Directive (EU) 2019/1937 ("**Legal obligation**").
- The processing of your personal data is possible based on our **legitimate interest** under the DPR Article 6(1)(f) ("**Legitimate interest**").
eMAG has a prevailing legitimate interest to process your personal data for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. eMAG also has a legitimate interest to comply with its legal obligation to Reporting to the competent authorities any suspicion of crimes eMAG may discover during the investigation.

If you wish to know more about our legitimate interests, please contact us via the details you may find in the 'Data Protection Officer' section below.

Purpose of data processing	Categories of personal data processed	Legal basis	Retention period
Operation and Follow-up Actions relating to internal Reporting:	<ul style="list-style-type: none"> • Personal Details • Details of the Report 	Legal obligation	5 years after verification of closure of the case.
conducting investigations	<ul style="list-style-type: none"> • Personal Details • Details of the Report • Details of the investigation 	Legal obligation	5 years after verification of closure of the case.
Sharing Reports	<ul style="list-style-type: none"> • Personal Details • Details of the Report • Details of the investigation 	Consent	Until you withdraw your consent.
Secure legal compliance	<ul style="list-style-type: none"> • Personal Details • Details of the Report • Details of the investigation 	Legitimate interest	Until the relevant process has run its course or the applicable retention periods for Hungary have run out; whichever is longer.



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WHO MAY ACCESS TO YOUR DATA?	<p>If you are a Whistleblower, your personal data may only be shared with other people and entities other than the Designated Person if you explicitly consented to it. This does not apply if you have taken part in the suspected misconduct or you deliberately abused the Whistleblowing Policy by making your Report in bad faith.</p> <p>Within eMAG, the Investigation Team being employees with appropriate authorization may have access to your personal data on a “need-to-know” basis and they must secure the confidentiality of your personal data.</p> <p>We may also transfer your personal data to the following categories of recipients:</p> <ul style="list-style-type: none">• Designated Person: eMAG has engaged and designated <i>Orbán Law Office</i> (Orbán Ügyvédi Iroda, address: 1023 Budapest, Veronika utca 4.; e-mail: emag@orbanlaw.hu) a whistleblower protection lawyer in charge with the receipt, registration, review and settlement of Reporting, as well as with undertaking Follow-up Actions who is in charge of the operation of eMAG’s whistleblowing system. Orbán Law Office acts as an independent data controller and handles all reports with strict confidentiality obligation.• eMAG Group: your personal data may be shared within the eMAG Group if you consent to sharing of your data and report.• Other third parties: we may transfer your personal data to external law firms and external investigation agencies so far as necessary for the conclusion of the investigation or for the establishment, exercise or defence of legal claims and as a Whistleblower you provide consent to the sharing of your data, unless sharing of the data is permitted / required by the law. <p>In connection with the receipt of Reporting and investigations and Follow-up Actions, we do not transfer your personal data to countries which do not secure adequate level of protection.</p>
YOUR RIGHTS	<p>If the related data processing is based on your consent, then you are free to withdraw your consent any time and we will not continue our data processing activity relative to you. The withdrawal of your consent does not affect the lawfulness of prior data processing.</p> <p>Further to this, you are entitled to exercise your rights indicated below:</p> <p>(i) Right of access: You have a right to ask whether or not we process personal data about you and, if that is the case, request information about the personal data we process.</p> <p>We may request additional information from you for identification or for further copies requested by you, or we may charge a reasonable fee based on administrative costs.</p> <p>(ii) Right to rectification: We are required to rectify inaccurate personal data, or to complete personal data that is incomplete, on your request.</p> <p>(iii) Right to erasure (right to be forgotten): We are in some circumstances required to erase personal data on your request.</p> <p>(iv) Right to restriction of processing: We are in some circumstances required to restrict our use of personal data on your request. In such cases, we may only use the data for certain limited purposes set out by the law.</p> <p>(v) Right to data portability: You may have the right to receive your personal data to which we have access, in a structured, commonly used and machine-readable format and may then have a right to transmit those data to another entity without hindrance from us.</p> <p>(vi) Right to object:</p> <div data-bbox="375 1597 1433 1765" style="border: 1px solid black; padding: 5px;"><p>You have the right to object to the processing of your personal data for any reason relating to your situation, and in this case, we may not be able to process your personal information. If you have the right to object and the exercise of this right is justified, your personal data in concern will not be further processed for the purposes of the objection. The exercise of this right does not entail any costs.</p></div> <p>If you consider that your privacy and data protection rights have been infringed, you may contact the competent data protection authority located in the European Union’s relevant Member State where your habitual residence, place of work or place of the alleged infringement is or the Hungarian National Data Protection and Freedom of Information Agency (Nemzeti Adatvédelmi és Információszabadság Hatóság – NAIH; address: H-1055 Budapest, Falk Miksa u. 9-11.; website: www.naih.hu; phone: +36- 1-391-1400; email address: ugyfelszolgalat@naih.hu; fax: +36 1 391 1410).</p>



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DATA
PROTECTION
OFFICER

If you have any further questions about the Privacy Notice or how we process your personal data, please contact us by sending your query to us to our email address data.protection@emag.hu or via letter to our Data Protection Officer at address: 1097 Budapest, Könyves Kálmán krt. 34. (LIBERTY Irodaház).
