

PRIVACY NOTICE

- regarding data processing in connection with the operation of Aspect Energy's Whistleblowing and ESG complaint handling system -

In order to comply with Act XXV of 2023 on complaints, reports in the public interest and rules relating to the reporting of misconduct (the "**Complaints Act**") and in view of the provisions of Act C of 2000 on Accounting (Accounting Act) on sustainability and Act CVIII of 2023 (the "**ESG Act**"), Aspect Energy Kft. (registered office: 1026 Budapest, Pasaréti út 46.; company registration number: 01-09-891033) (the "**Aspect Energy**") Aspect Energy Services Kft. (registered office: 1026 Budapest, Pasaréti út 46.; company registration number: 01-09-324572) (the "**Aspect Energy Services**") and the other Aspect companies listed in *Annex 3* to this data processing notice have jointly decided to operate an internal whistleblowing system to ensure that illegal or suspected illegal acts or omissions, or other information relating to misconduct can be reported effectively. The internal misconduct reporting system also serves to receive and handle ESG (environmental, social and corporate governance) reports and complaints.

The parties have appointed Aspect Energy to operate the internal whistleblowing and ESG complaint handling system.

The purpose of this data processing notice (the "**Data Processing Notice**") is to provide you, as the data subject, with information about the processing of your personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (the "**GDPR**") and Act CXII of 2011 on the right to self-determination and freedom of information (the "**Infotv.**").

This Data Processing Notice contains the common rules applicable to data processing activities carried out by Aspect Energy. The characteristics of each specific data processing activity, in particular the purpose of the data processing, the scope of the personal data processed, the period of retention of personal data, and other characteristics of the operation are set out in *Annex 1*.

The content of the Data Processing Notice may change from time to time, and we will endeavor to notify you of any such changes.

1. DATA CONTROLLER, DATA PROTECTION CONTACT PERSON AND CONTACT DETAILS

The controller of personal data is Aspect Energy Kft. (registered office: 1026 Budapest, Pasaréti út 46.; company registration number: 01-09-891033) (the "**Data Controller**").

The Data Controller's designated contact person is **Annamária Miklós** (the "**Data Protection Contact**"). The Data Protection Contact's email address is amiklos@aspectenergy.eu.

If you have any questions or wish to exercise your rights to self-determination, you may contact the Data Controller or the Data Protection Contact Person directly.

2. RIGHTS TO SELF-DETERMINATION AND LEGAL REMEDIES

If you have any comments, questions, or complaints regarding the processing of your personal data, please contact the Data Controller directly, who will respond to your request without delay, but no later than one month after receiving your request. If the complexity of your request or the number of requests justifies it,

the response time may be extended by a further two months, of which the Data Controller will notify you within the original deadline.

You have various rights in relation to the processing of your personal data (so-called information self-determination rights), which are essentially determined by the legal basis for data processing. *Annex 1* specifies the rights you may have in relation to the given legal basis for data processing. Please note that the GDPR may lay down additional conditions for the exercise of a right, which may, in certain cases, exclude or restrict the exercise of that right or lay down additional conditions in relation to it. Therefore, before exercising your rights to self-determination, please carefully review this Privacy Policy, the relevant section of *Annex 1*, and the provisions of the GDPR regarding the detailed content of the right.

a) **Withdrawal of consent** (GDPR Article 7(3))

You have the right to withdraw your consent to data processing at any time. The withdrawal of consent does not affect the lawfulness of data processing based on consent prior to withdrawal.

b) **Access** (GDPR Article 15)

You have the right to obtain confirmation from the Data Controller as to whether your personal data is being processed and, if so, you have the right to access your personal data and certain information specified in Article 15 of the GDPR.

c) **Rectification** (Article 16 of the GDPR)

You have the right to request that the Data Controller correct any inaccurate personal data concerning you without undue delay. Taking into account the purpose of the processing, you have the right to request that incomplete personal data be completed, including by means of providing a supplementary statement.

d) **Erasure ("right to be forgotten")** (Article 17 of the GDPR)

You have the right to request that the Data Controller erase personal data concerning you without undue delay, and the Data Controller is obliged to erase personal data concerning you without undue delay if one of the grounds specified in Article 17 applies.

e) **Restriction of processing** (Article 18 of the GDPR)

You have the right to request that the Data Controller restrict data processing if the grounds set out in Article 18 apply.

f) **Data portability** (GDPR Article 20)

You have the right to receive your personal data provided to the Data Controller in a structured, commonly used, machine-readable format, and you have the right to transmit those data to another data controller without hindrance from the Data Controller, if: the processing is based on consent pursuant to Article 6(1)(a) or Article 9(2)(a), or is necessary for the performance of a contract pursuant to Article 6(1)(b) and the processing is carried out by automated means. When exercising your right to data portability, you have the right to request the direct transfer of personal data between data controllers, if technically feasible.

g) **Objection** (Article 21 of the GDPR)

In the case of data processing based on our legitimate interest: You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data based on legitimate interest, including profiling based on that provision. In this case, the Data Controller may no longer process the personal data unless the Data Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

In the case of data processing for direct marketing purposes: If personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for this purpose, including profiling, insofar as it is related to direct marketing. If you object to the processing of personal data for direct marketing purposes, we will no longer process your personal data for this purpose.

3. REMEDIES

In the event of a violation of your rights relating to the processing of personal data, you may exercise the following remedies:

- a) You can contact the Data Controller or the Data Protection Contact Person directly using the contact details provided in point 1.
- b) You may lodge a complaint with the supervisory authority:

The supervisory authority in Hungary is the **National Authority for Data Protection and Freedom of Information** (registered office: 1055 Budapest, Falk Miksa utca 9-11.; postal address: 1363 Budapest, Pf.: 9.; e-mail: ugyfelszolgalat@naih.hu; phone: +36 (1) 391-1400; web: www.naih.hu)

- c) You may file a claim against the Data Controller or the data processor engaged by it.

You have the right to take legal action against the Data Controller or, in connection with data processing operations falling within the scope of the data processor's activities, against the data processor if, in your opinion, the Data Controller or the data processor acting on its behalf or on its instructions is processing your personal data unlawfully. You may also bring the action before the court with jurisdiction over your place of residence or place of stay, at your discretion. Information on the jurisdiction and contact details of the court is available on the following website: www.birosag.hu.

4. VERSION DATA

The Data Processing Notice was issued on 16 March 2026.

ANNEX 1

- on data processing in connection with the operation of Aspect Energy's internal whistleblowing and ESG complaint handling system -

GENERAL CHARACTERISTICS OF DATA PROCESSING	
Description of data processing purpose:	Aspect Energy_CORPORATE GOVERNANCE_001_ Whistleblowing and ESG complaint handling system
Description of the purpose of data processing:	Investigating Reports made in the internal abuse reporting system and taking appropriate action as a result, which may include, depending on the case, rejecting the Report, rectifying the unlawful act or other abuse that is the subject of the report, and, if necessary, taking further legal action, including, but not limited to, enforcing civil law claims, filing criminal charges, initiating administrative proceedings, or taking other necessary legal action.
Categories of personal data processed:	Personal data provided in the report, personal data created by the Data Controller during the investigation
Legal basis for data processing	Legal basis for data processing: - in accordance with Article 6(1)(c) of the GDPR, the legal obligation set out in Sections 18(1) and 22(2) of the Complaints Act with regard to the data processing authorization set out in Section 26 (1) (mandatory data processing); and - Article 6(1)(a) of the GDPR, the explicit and voluntary consent of the data subject as set out in this detailed information notice. If the notification contains special categories of personal data, the data controller shall process the necessary personal data on the basis of the permissive rule set out in Article 9(2)(f) of the GDPR (necessary for the establishment, exercise, or defense of legal claims).
Consequences of failure to provide data:	On the one hand, the Data Controller will not be able to comply with its legal obligations in some cases, and on the other hand, it will not be able to investigate the report in certain cases.
Duration of data processing	Irrelevant personal data will be deleted immediately, but no later than within 30 (thirty) days.

	After the investigation has been completed, the investigation materials will be stored for 5 (five) years, in view of the limitation period specified in Section 6:22 of Act V of 2013 on the Civil Code.	
Data subjects	(i) the reporting person; (ii) the person whose conduct or omission gave rise to the report; (iii) the person who may have relevant information about the contents of the report; and (iv) employees, contributors, and other persons involved in the investigation.	
Source of personal data	The content of the report and personal data collected and created during the investigation.	
Is the provision of data a prerequisite for the conclusion of the contract? (Yes/No)		No
Is the data subject obliged to provide personal data? (Yes/No)		Yes
Is profiling carried out as part of the data processing activity? (Yes/No)		No
PERSONS WITH ACCESS TO PERSONAL DATA		
Persons with access to personal data	Whistleblower Protection Officer, a limited circle of management, and, depending on the case, any person whose involvement in the investigation is justified.	
Transfer of personal data		
Recipients	The Aspect companies listed <i>in Annex 3</i> (hereinafter: "Aspect")	
Recipient status	Joint data controller	
Purpose of transfer	Based on the agreement between the parties, Aspect Energy shall fulfill the data protection compliance obligations towards the data subjects as the operator of the internal whistleblowing system. Aspect Energy is entitled to use Aspect employees as part of the investigation team and, if the case also affects any Aspect company, to transfer the personal data necessary for the preparation of the final decision to the relevant Aspect company, during which personal data may be transferred within the justified scope. Aspect Energy is only entitled to disclose the identity and other personal data of the reporting person if the reporting person has expressly consented to this.	

DATA SUBJECTS' RIGHTS TO CONTROL THEIR INFORMATION

(A description of each right and how to exercise it is included in Aspect Energy's Data Management Policy. Abbreviations Y= Yes/ N= No/ F= as defined in the GDPR)

Withdrawal of consent	Y	Access	Y	Rectification	Y	Delete	F
Restriction of processing	F	Data portability	N	Objection	Y	Complaint (to the data controller)	Y
Complaint (to the supervisory authority)	Y	Legal action (before a court)	Y				
- Pursuant to Section 26(4) of the Complaints Act, if the report concerns a natural person, the personal data of the reporting person may not be disclosed to the person requesting the information when exercising their right to information and access in accordance with the provisions on the protection of personal data. - In cases based on consent, the possibility of withdrawing consent: The data subject may withdraw their consent to the processing of personal data at any time by sending a written statement to the Data Controller. The withdrawal of consent does not affect the lawfulness of data processing based on consent prior to withdrawal. In the event of withdrawal of consent, the Data Controller shall delete the personal data without delay.							

ANNEX 2

STATEMENT

CONCERNING CONSENT TO THE PROCESSING OF PERSONAL DATA

I, the undersigned, (name, contact details), declare that I have read and understood the information provided by the Data Controller on *"Data processing in connection with the operation of Aspect Energy's internal abuse reporting and ESG complaint handling system."*

I declare that I clearly and expressly consent to the processing of my personal data as described in the information sheet.

Dated,

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Name

ANNEX 3

- 1 Aspect Croatia Ltd.
- 2 Aspect Energy Ltd.
3. Aspect Energy Services Ltd.
4. Aspect TDE Geotherm Ltd.
5. Aspect Hungarian Management Ltd.
6. Blue Star 95 Ltd.
- 7 Corvinus Energy Ltd.
8. Csongrád Concession Kft.
- 9 Darany Energy Ltd.
- 10 Gádoros Concession Ltd.
- 11 HHE DrávaP Concession Ltd.
- 12 HHE DrávaP Ventures Ltd.
- 13 HHE Group Kft.
- 14 HHE Group Ventures Ltd.
- 15 HHE Gyulavari Kft.
- 16 HHE Sarkad Ltd.
- 17 Horizon General Kft.
- 18 Lakocsa Concession Kft.
- 19 Magyar Horizont Energia Kft.
- 20 MOL-Aspect DNY Ltd.
- 21 PanBridge Hungary Ltd.
- 22 Pusztaszer Concession Kft.