

INFORMATION NOTICE ON HANDLING ORGANISATIONAL INTEGRITY COMPROMISING INCIDENTS and ESG COMPLAINTS, AS WELL AS RECEIVING AND INVESTIGATING REPORTS

9 April 2025

1. Introduction

- **1.1.** This documents provides guidance to those third parties who are not employees of HungaroControl Hungarian Air Traffic Service Pte. Ltd. Co (hereinafter referred to as: Company or HungaroControl Pte. Ltd. Co) but wish to report an organisational integrity compromising incident or ESG complaint through the whistleblowing system of the Company or of the whistleblower protection lawyer.
- 1.2. HungaroControl Pte. Ltd. Co operates its Whistleblowing System and the rules of procedure for the handling of organisational integrity compromising incidents and ESG complaints in accordance with Government Decree 339/2019 (XII. 23.) on the Internal Control System of Publicly Owned Companies, Act XXV of 2023 on Complaints and Public Interest Disclosures, and on the Rules of Whistleblowing Notifications (hereinafter referred to as: 'Complaints Act'), and Act CVIII of 2023 on the Provisions for Corporate Social Responsibility Taking into Account Environmental, Economic and Social Considerations Aiming to Foster Sustainable Financing and a Single Corporate Responsibility Regime and on the Amendment of Other Related Regulations (hereinafter referred to as: 'ESG Act').

2. Interpretative provisions

- a) Whistleblowing system: an information and communication system operated in accordance with the provisions of the Complaints Act and the ESG Act to ensure the internal and external flow of information and the lawful and prudent operation of the Company, used to report and manage organisational integrity compromising incidents and complaints, as well as ESG complaints.
- **b)** Notification: the reporting of incidents that compromise the organisational integrity of the Company, and the reporting of ESG complaints.
- c) Whistleblower: with regard to organisational integrity compromising incidents, the person defined in Section 20(2)–(3) of the Complaints Act, and with regard to ESG complaints, anyone who detects a breach of social responsibility or environmental protection obligations by HungaroControl Pte. Ltd. Co. or its subsidiary (subsidiaries) or direct suppliers as a result of their economic activities in the course of their activities performed under a contract with HungaroControl Pte. Ltd. Co.
- d) Whistleblower protection lawyer: a person as defined in Section 51 (1) of the Complaints Act.

e) Person concerned by the notification:

- a. an employee of the Company whose conduct or omission gave rise to the notification or who may have material information about the subject matter of the notification;
- b. and any person acting on behalf or in the interest of an individual who has a contractual relationship with the Company or a legal person who has a contractual relationship with the Company, whose conduct or omission in relation to his or her contractual activities gave rise to the notification or who may have material information about the subject matter of the notification (hereinafter referred to as: external person concerned by the notification).
- f) Integrity: the proper functioning of a publicly owned company in accordance with the objectives, values and principles of the Company.
- **g)** Organisational integrity compromising incident: any incident or event that deviates from the laws, internal regulations applicable to the Company, including rules of conduct that protect the public interest or overriding private interests, and from the proper functioning of the objectives, values and principles of the publicly owned company.

An organisational integrity compromising incident may be an intentional or negligent breach of organisational integrity through abuse, action or omission.

- **h)** Significant integrity compromising incident: means any organisational integrity compromising incident that
 - a. seriously undermines the smooth and undisturbed operation of the Company; and/or
 - b. adversely affects the reputation of the Company; and/or
 - c. involves a financial disadvantage exceeding HUF 500,000; and/or
 - d. may give rise to court or administrative proceedings.
- i) **ESG complaint:** complaints concerning social responsibility and environmental risks resulting from the economic activities of the Company and/or the activities of its subsidiaries and/or direct suppliers performed under contract concluded with the HungaroControl Pte. Ltd. Co., as well as complaints regarding any breach of social responsibility or environmental protection obligations.
- **j) ESG risk and incident:** a social responsibility or environmental protection risk, and/or an incident breaching a social responsibility or environmental protection related obligation arising from the economic activities of the company or its subsidiary and/or direct suppliers.
- **k) Complaint Officer:** an employee of the Company, assigned to investigate a specific notification and/or the whistleblower protection lawyer.

3. Procedures for the operation of the Whistleblowing system

3.1. Reporting organisational integrity compromising incidents, complaints and ESG complaints

- 3.1.1. Reporting of organisational integrity compromising incidents, complaints and/or ESG complaints (hereafter referred to as: notification) shall be done through the Whistleblowing system.
- 3.1.2. The notification can be made by the whistleblower, in the following ways:
 - a) through a whistleblowing system operated by an external service provider that provides whistleblower protection:
 - b) by e-mail to: <u>HungarocontrolPanaszbejelentes@leitnerlaw.eu</u>
 - by phone: +36 1 796 36 70,
 - on the whistleblower platform operated on the website of the whistleblower protection lawyer: https://klartlegal.eu/bejelentovedelem/ and
 - c) directly by e-mail to panaszbejelentes@hungarocontrol.hu.
- 3.1.3. The whistleblower protection lawyer shall record the telephone report in writing and, ensuring the possibility of verification, correction and acceptance by signature, shall provide the whistleblower with a copy of the report, provided that the whistleblower has given his/her contact details during the notification.
- 3.1.4. If a whistleblower does not make the notification in one of the ways set out in Section 3.1.2, but sends it in a different manner to the Company, HungaroControl Pte. Ltd. Co. shall immediately inform the whistleblower of the possibilities of making the notification as set out in clause 3.1.2, with the addition that the substantive investigation of the notification may only take place in the case of notifications made in the manner set out therein.
- 3.1.5. The notification shall include:
 - a) the name, designation and contact details of the whistleblower;
 - b) with regard to organisational integrity compromising incidents, his or her capacity giving rise to the right of notification,
 - c) a description of the organisational integrity compromising incident or risk or the ESG incident or risk;
 - d) the name, post of employment and organisational unit (if known) of the employee concerned

by the notification;

- e) if the notification concerns an external person:
 - a. the name of the natural person (if known),
 - b. in the case of a legal entity having a contractual relationship with the Company, the name of the legal entity or the person whose conduct or negligence in relation to its contractual activity gave rise to the notification, as well as (if known) the subject matter of the contract.

3.2. Preliminary examination of the notification, methodology of the preliminary assessment

- **3.2.1.** The preliminary examination of the notification is carried out by the whistleblower protection lawyer.
- 3.2.2. A person who is biased or who cannot otherwise be expected to give an objective assessment of the case may not participate in the preliminary examination of the notification.
- 3.2.3. Within 7 days of receipt of the written notification, the whistleblower protection lawyer will send the whistleblower an acknowledgement of the notification, including information on the procedural and data management rules and a warning of the legal consequences of a bad faith notification. The whistleblower protection lawyer obtains a statement from the whistleblower acknowledging receipt of the information and maintaining the whistleblower notification.
- 3.2.4. The whistleblower protection lawyer shall, promptly upon receipt of the notification, forward to the Company the notification that does not contain any information that would allow the identification of the whistleblower.
- 3.2.5. The whistleblower protection lawyer will consider the following aspects during the preliminary examination of the notification:
 - a) whether the notification contains the elements set out in Section 3.1.5 or whether a request for completeness is required;
 - b) in the case of an organisational integrity compromising incident, whether the examination of the notification may be dispensed with;
 - c) whether the notification should be handled as an organisational integrity compromising incident, or an ESG complaint;
 - d) whether immediate action is required on the basis of the notification to prevent any ongoing or further integrity compromising or in breach of ESG legislation incidents or activities (the complaint-handling officer may seek the expert opinions of the Company's divisions to determine the need for immediate action).
- **3.2.6.** The whistleblower protection lawyer may dispense with the examination of the notification in the cases specified in the Complaints Act.
- **3.2.7.** The investigation may be opened once the data necessary to conduct it are available.
- 3.2.8. Based on the preliminary investigation, the whistleblower protection lawyer will inform the Company of the outcome of the preliminary investigation.
- 3.2.9. If the preliminary investigation determines that immediate action is necessary, the whistleblower protection lawyer will promptly inform the Company of this and the action he or she proposes to take. If the Company determines that immediate action is justified, it ensures implementation of the necessary measures and informs the whistleblower protection lawyer of the completion of the action.

3.3. Investigation of the notification

3.3.1. If the investigation of the notification cannot be avoided, the complaint-handling officer will start

the investigation of the notification. The following persons can proceed as complaint handling officer:

- a) a designated employee of the Company acting independently, or
- b) with regard to organisational integrity compromising incidents, pursuant to the Company's specific authorisation the whistleblower protection lawyer acting independently, or
- c) with regard to organisational integrity compromising incidents the designated employee of the Company and the whistleblower protection lawyer jointly.
- 3.3.2. Once the investigation has been commenced, the complaint-handling officer will inform the person concerned by the notification, by electronic means, providing the path to the relevant information notices, of the following:
 - a) the notification,
 - b) his or her rights in relation to the procedure and the protection of his or her personal data,
 - c) the rules on the processing of his or her personal data.

In exceptional cases, the person concerned by the notification may be informed at a later stage, in duly justified cases, if immediate information to him or her would frustrate and prevent the proper investigation of the notification.

- 3.3.3. If the person concerned by the notification is an employee of the Company, the complaint-handling officer may, at the same time as informing the employee concerned, inform the head of the organisational unit concerned of the fact of the notification.
- 3.3.4. Where a legal person is concerned by the notification, the complaint-handling officer shall inform its representative who is not concerned by the notification. (If the legal representative is concerned by the notification, the information may be omitted.)

3.4. The method of collection of the information required to investigate the notification

- 3.4.1. In the course of investigation, the complaint-handling officer shall be entitled to:
 - a) have a personal interview with the whistleblower, the employee concerned by the notification and the employee who has information on the subject of the notification;
 - b) initiate consultation with the external person, organ or organisation concerned by the notification;
 - c) request, access and use documents and information necessary for the investigation of the notification;
 - d) request an expert opinion necessary to clarify the facts and to provide evidence;
 - e) request the necessary expert opinion from the Company's divisions to determine whether the incident is to be classified as a significant integrity compromising incident;
 - f) conduct an inspection.
- 3.4.2. The organisational unit and employee or external person contacted during the information gathering process is obliged to cooperate with the complaint-handling officer during the inspection and personal interviews, to provide the requested information and expert opinion, and to hand over or send the requested documents and data to the complaint-handling officer within the time limit set by the complaint-handling officer.

3.5. Review of the relevant documents

3.5.1. After assessing the notification, the complaint-handling officer will check the availability of the documents necessary for his or her procedure or indicated in the submission, as well as the availability of any additional information necessary for dealing with the notification. If necessary, he or she will arrange for additional documents and information to be obtained.

3.6. Hearing of the persons concerned

3.6.1. Where the nature of the notification and its effective handling so justify, the complaint-handling officer shall interview the employee concerned by the notification or who is aware of the notification. The employee

must be notified of the initiation of the personal interview in writing at least 2 working days before the interview or, if written notification is not possible, by telephone or orally (the latter must also be documented).

This notification must include the subject of the whistleblowing notification.

3.6.2. The complaint handling officer shall prepare a record of the personal interview, which shall include: a) the place and date of the interview;

b) data concerning the name, legal relationship and organisational unit of the person interviewed;c) the capacity in which the person being interviewed is present;

d) the subject of the interview;

e) the questions asked during the interview and the answers given to them;

f) the fact that the record has been disclosed to the person interviewed and a declaration of consent with regard to the contents of the record;

g) the signatures of the participants of the interview.

3.7. Closing the investigation

- 3.7.1. The complaint-handling officer will investigate the allegations made in the notification within not more than 30 days of receipt of the notification. In particularly justified cases, the time limit for the investigation may be extended for a maximum of three months. The extension of the time limit may be granted with simultaneous notification of the whistleblower, except if the notification was made by an anonymous or unidentified whistleblower. A notification made after the closing of investigation will be treated as a new complaint even if it relates to the closed investigation.
- 3.7.2. The complaint-handling officer will prepare an investigation report on the results of the investigation.

3.8. Information on the outcome of the investigation

- **3.8.1.** The complaint-handling officer shall inform the whistleblower of the outcome of the investigation and the action taken.
- 3.8.2. If the person concerned is an external person, the complaint-handling officer shall inform the person concerned by the notification or, in the case of a legal person, its representative not concerned by the notification, about the outcome of the investigation and the action taken.
- 3.7.1. If the whistleblower protection lawyer acts as the complaint-handling officer, he or she shall send the report to the Company with any information that would allow the identification of the whistleblower redacted and shall inform the Company of any measures taken.
- 3.7.2. The Company will inform the whistleblower (if known) of the action taken in relation to the notification, by electronic means. If the identity of the whistleblower is not known to the Company, the actions will be communicated by the Company to the whistleblower protection lawyer, who will inform the whistleblower.

4. Legal consequences that can be imposed for incidents compromising integrity and/or ESG risks or incidents

4.1. If the investigation of the notification reveals that an organisational integrity compromising incident, or ESG incident has occurred, or ESG risk has been identified, the following legal consequences may

be imposed as necessary measures:

- a) labour law measures:
 - a. adverse legal consequences,
 - b. establishment of liability for damages,
 - c. termination of the employment relationship;
- b) other legal measures:
 - a. termination of the contract with the external person concerned by the notification,
 - b. initiation of misdemeanour proceedings before the competent authority,
 - c. initiation of criminal proceedings before the competent authority,
 - d. initiation of civil proceedings before the court of competent jurisdiction to establish liability for damages or to claim and enforce damages,
 - e. initiation of other official proceedings.

5. Documentation, consultation of documents and registration of notifications

- **5.1.** The whistleblower shall have access to his/her own notification and to his/her statements made during the procedure; the persons who made statements during the interviews shall also have access to their own statements.
- **5.2.** A Társaság shall maintain a register of data and information generated during the notification and investigation of organisational integrity compromising incidents and ESG complaints (hereinafter as: the Register).
- **5.3.** With regard to organisational integrity compromising incidents the anonymization of documents containing personal data shall be commenced after the investigation is fully completed and shall last until the last day of the month following the month in which the investigation was completed at the latest.
- **5.4.** Paper-based documents received will be handled in accordance with the relevant data processing notice and the Records Management Regulation.

6. Protection of the whistleblower and the processing of personal data

- **5.5.** In the course of the investigation, both the Company and the whistleblower protection lawyer shall allow the person concerned by the notification to express his or her views on the notification, including through his or her legal representative, and to provide evidence in support of those views.
- **5.6.** No adverse action may be taken against the whistleblower on the basis of his or her notification.
- **5.7.** Employees of the Company and the whistleblower protection lawyer involved in the investigation of the notification and the implementation of the actions and measures must keep confidential information on the content of the notification and the persons concerned by the notification and ensure that the personal data of the whistleblower are not disclosed to any person other than the employees involved in the investigation and in the initiation and implementation of the related actions and measures.
- **5.8.** If, during the investigation, it becomes apparent that the whistleblower has provided false data or information in bad faith and that there are indications that a criminal offence or misdemeanour has been committed thereby, the personal data of the whistleblower must be handed over to the body or person responsible for conducting the procedure.

- **5.9.** If there are reasonable grounds to believe that the whistleblower has caused unlawful damage or other legal harm to another person by providing false data or information in bad faith, the personal data of the whistleblower must be handed over to the body or person entitled to initiate or conduct the proceedings, upon his/her request.
- **5.10.** The investigation report may contain personal data only if the recording of such data is strictly necessary for the interpretation of the report and the establishment of liability.
- **5.11.** The Company may process personal data obtained in connection with notifications, including sensitive data and criminal personal data, only for the purposes of investigating the notification and initiating and implementing actions and measures to remedy or stop the conduct that is the subject of the notification, as well as carrying out the activities of a whistleblower protection lawyer under the Complaints Act.
- **5.12.** The Company's information on the processing of personal data is included in Annex No. 1.
- **5.13.** The whistleblower protection lawyer's data processing policy is available at the following link: <u>SZLAÜI bejelentovedelmi ugyved adatkezelesi tajekoztato.pdf (klartlegal.eu)</u>

Annexes:

Annex 1: Privacy Policy

INFORMATION

on data processing operations carried out regarding the examination of notifications relating to incidents compromising organisational integrity and ESG complaints, the initiation and implementation of the related actions and measures and during monitoring and registration of such actions and measures

(last updated: 1 January 2025)

We wish to inform you, the data subject, that HungaroControl Pte. Ltd. Co. (hereinafter referred to as: HungaroControl, Data Controller) shall process your personal data relevant to reports of incidents compromising organisational integrity and ESG complaints in accordance with the *"Policy on handling and investigating conflicts of interest, organisational integrity compromising incidents and ESG complaints"*, in accordance with Act XXV of 2023 on Complaints and Public Interest Disclosures and on the Rules of Whistleblowing Notifications (hereinafter referred to as: Complaints Act) and Act CVIII of 2023 on the Provisions for Corporate Social Responsibility Taking into Account Environmental, Economic and Social Considerations Aiming to Foster Sustainable Financing and a Single Corporate Responsibility Regime and on the Amendment of Other Related Regulations (hereinafter referred to as: 'ESG Act') as per the following:

Related data	Sources of data	Purpose of data processing	Legal basis for data processing	Retention period
 a) Whistleblower's name, position and department (only in the case of an ESG complaint, or if the organisational integrity compromising incident is sent to panaszbejelentes@hungarocontrol.hu, or is not reported via the Whistleblowing System, or the whistleblower delegated a whistleblower protection lawyer to forward the information to HungaroControl), b) The whistleblower's capacity giving rise to the right of reporting, c) Other personal data provided in the report (only in the case of an ESG complaint, or if the organisational integrity compromising incident is sent to panaszbejelentes@hungarocontrol.hu, or is not reported via the Whistleblowing System, or the whistleblower delegated a whistleblower protection lawyer to forward the information to HungaroControl), 	 The whistleblower, Documents and records provided by the whistleblower protection lawyer, Document obtained by HungaroControl by other means, containing information underlying the breach of, or risk to integrity or the ESG incident or risk 	Investigation of the report (if the report is examined by a designated HungaroControl employee him or herself, or by the designated HungaroControl employee and the whistleblower protection lawyer together) and initiating measures for remedying or terminating the conduct reported or an ESG incident, including the execution of such measures, and monitoring and registration of such measures in accordance with the Complaints Act and the ESG Act	Article 6(1)(c) of the GDPR – compliance with the legal obligation prescribed by the Complaints Act and the ESG Act	The duration of investigation of the report, not exceeding thirty days from the date of receipt of the report, that may be extended on a duly justified basis subject to notification of the whistleblower thereof, noting that it may not exceed three months even if extended (anonymisation of personal data shall begin when the investigation is wholly completed, and it shall end on the last day of the month following conclusion of the investigation)

1. DETAILED DESCRIPTION OF DATA PROCESSING

Related data	Sources of data	Purpose of data processing	Legal basis for data processing	Retention period
 d) Name, position and department of the employee involved in the incident compromising integrity, whose conduct or omission was reported, e) Name, position and department of any other person involved in the incident reported, f) Name, position and department of the person involved in the investigation of the report and in the ensuing measures, g) Other personal data that may have been recorded in the documents drawn up during the investigation of the report. h) Date and time of the report 	 A. The whistleblower, B. Documents and records provided by the whistleblower protection lawyer, Document obtained by HungaroControl by other means, containing information underlying the breach of or risk to integrity 	Investigation of the report (if the report is examined by a designated HungaroControl employee him or herself, or by the designated HungaroControl employee and the whistleblower protection lawyer together) and initiating measures for remedying or terminating the conduct reported, including the execution of such measures, and monitoring and registration of such measures in accordance with the Complaints Act and the ESG Act	Article 6(1)(c) of the GDPR – compliance with the legal obligation prescribed by the Complaints Act and the ESG Act	The duration of investigation of the report, not exceeding thirty days from the date of receipt of the report, that may be extended on a duly justified basis subject to notification of the whistleblower thereof, noting that it may not exceed three months even if extended (anonymisation of personal data shall begin when the investigation is wholly completed, and it shall end on the last day of the month following conclusion of the investigation)

2. THE PROCESS AND THE MEANS OF PROCESSING

a) reviewing, collection, processing, use, storage, erasure and destruction of data,

b) transfer of data to the whistleblower protection lawyer, or to the authority having competence for carrying out the procedure based on the report.

3. DATA SECURITY MEASURES

- 1. We would like to inform you that the Data Controller keeps all personal data confidential as they can be accessed only by the HungaroControl employees involved in the investigation of the report, in the implementation of measures and in keeping records of such reports, and by the whistleblower protection lawyer. The whistleblower shall have access to his or her own report and to his or her statements made during the procedure; the persons who made statements during the interviews shall also have access to their own statements.
- 2. HungaroControl shall not disclose such data to third parties, and shall not publish them without notifying you in advance and without your consent, except where mandatory data disclosure to the authorities and other organs is prescribed by law. This applies to all other information having the potential, directly or indirectly, to lead to identifying the whistleblower.
- 3. Please note that HungaroControl keeps all personal data you have supplied electronically on servers (Platform) at its seat (H-1185 Budapest, Igló utca 33–35) in the electronic register of incidents compromising organisational integrity and paper-based documents in locked cabinets in the office of the Legal Unit of HungaroControl, or in the offices of the unit responsible for the investigation of the ESG complaint. In processing personal data, in accordance with the relevant legislation, HungaroControl introduces administrative and technical protection measures appropriate for the risk involved in order to

prevent unlawful and unauthorised access to personal data, including the unlawful and unauthorised alteration of such personal data, featuring facilities for control in manual and automated data processing operations alike. Furthermore, the Data Controller has technical solutions in place to prevent the interconnection of data stored in various records systems and the identification of the data subjects.

4. DATA PROCESSORS

We would like to inform you that HungaroControl does not use a data processor.

5. YOUR RIGHTS

- a) Right to transparent information With this notice the Data Controller provides information about the context of data processing, that is to say concerning the reasons and the legal basis for processing your personal data, who the data processor is and for how long your personal data will be processed, your rights in connection with such data processing and who to turn to if you have question or complaint;
- b) Right of access to your personal data You have the right to obtain from the Data Controller confirmation as to whether or not your personal data concerning are being processed, and, where that is the case, to receive a copy of your personal data. Requesting such copy is free of charge for the first time, whereas HungaroControl may charge a reasonable fee based on administrative costs for each additional copy;
- **c)** Right of rectification of your personal data You have the right to obtain from the Data Controller the rectification of inaccurate personal data concerning you, or to have incomplete personal data completed;
- **d)** Right of erasure of your personal data You have the right to obtain from the Data Controller the erasure of your personal data, and HungaroControl or its data processor shall have the obligation to erase your personal data at your request if:
 - the personal data have been unlawfully processed;
 - the purpose of processing no longer exists or the personal data are no longer necessary;
 - you have withdrawn consent and where there is no other legal ground for the processing;
 - the legal time limit for storage has expired;
 - the erasure of data was ordered by law, by an authority or court;
- e) Right to restriction of processing You have the right to obtain from the Data Controller restriction of processing your personal data, with the exception of storage, for example, for the establishment, exercise or defence of legal claims;
- f) Notification obligation regarding the recipients of notification of rectification or erasure of personal data or restriction of processing – At your request the Data Controller shall provide information about such recipients;
- **g) Right to complain** You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of your personal data infringes the relevant data protection legislation.
- h) Compensation, claim for damages You are hereby informed that you have the right to demand compensation or lodge a claim for damages for losses resulting from unlawful data processing or for any violation of rights relating to personality;
- i) Notification HungaroControl shall evaluate any request submitted by the data subject concerning the exercise of his or her rights within the shortest possible time, not exceeding one month, and shall notify the data subject of its decision in writing, or electronically, if the data subject made the request by electronic means.

j) Costs – If you submit another request in the same year with respect to the same type of data, for reasons other than any negligence on the part of HungaroControl prompting the rectification, erasure or restriction of data, HungaroControl shall be entitled to recover the costs of compliance with such request.

6. WHERE TO TURN TO IF YOU HAVE A QUESTION IN RELATION TO EXERCISING YOUR RIGHTS, OR IF YOU WISH TO SEEK LEGAL REMEDY?

a) If you have any question, please contact the data protection officer of HungaroControl:

Dr. Anikó Fazekas Phone: +36-30-851-2515 E-mail: <u>dpo@hungarocontrol.hu</u>

b) Legal remedies:

Nemzeti Adatvédelmi és Információszabadság Hatóság (Hungarian National Authority for Data Protection and Freedom of Information) (NAIH) Mailing address: H-1363 Budapest, PO Box 9, Hungary Website: www.naih.hu Phone: +36-1-391-1400

Court:

In Hungary, the general court in whose jurisdiction the Data Controller's seat is located shall have jurisdiction to hear and determine any legal action, however, the data subject may choose to bring the action before the general court in whose jurisdiction the data subject's home address or habitual residence is located.