Policy on Actions Against Unlawful Reader Comments

Under Article 20/A of the Act CIV of 2010 on press freedom and the fundamental rules of media content (hereinafter referred to as the "Act"), if the publisher of an Internet press product provides the possibility of reader comments in connection with its content - either on its own or on a third-party internet platform - it is obliged to establish a public policy on the procedure to be followed after the publication of unlawful comments and to apply an effective solution accordingly. In order to fulfil this obligation, BL Nonprofit Ltd. (hereinafter referred to as the "Publisher") has established and applies the following policy.

1. Details of the Publisher

Company name: BL Nonprofit Ltd.

Company seat: 24 Eötvös street, 1st Fl., Door 16, 1055 Budapest, Hungary

Tax number: 22990600-2-42

Company registration number: 01-09-947934

E-mail address: <u>blpress@blpress.hu</u>

2. Purpose and Scope of the Policy

The Publisher provides the possibility to comment on published content on the online platforms it operates. The purpose of this Policy is to set out the procedure to be applied following the publication of unlawful comments by readers. This Policy applies to reader comments received in connection with all content published on all online platforms operated by the Publisher.

3. Action against unlawful comments

The Publisher will identify unlawful comments without delay, but no later than within 24 hours, and will remove them as a priority by making them inaccessible and unshareable. In the case of a severely unlawful comment (e.g. one that is intended to cause widespread panic, is blatantly hateful, incites aggression, or offends human dignity), the Publisher will take immediate action to remove it. The unlawfulness of the comment will be assessed by the Publisher on the basis of the Hungarian and European Union legislation in force and the related case law. A comment is considered unlawful particularly, but not exclusively, if it

- violates human dignity;
- violates rights relating to personality (e.g., the right to honor and reputation, the right to a name, the right to privacy, the right to confidentiality, the right to the protection of personal data, the right to one's image and voice recording);
- is capable of excluding any nation, community, religious community, national, ethnic, linguistic or other minority or majority;

- incites violence and is capable of fomenting hatred against any nation, community, religious community, national, ethnic, linguistic or other minority or majority, or any member thereof;
- calls for the commission of an act of terrorism or other criminal offence;
- constitutes an administrative offense or a criminal act (e.g., the use or publication of an expression, depiction, image, or audio recording that expresses an intent or wish to commit a violent, fatal act or a crime committed with particular cruelty against an identifiable person or persons);
- deliberately spreads false information or misleading statements;

The unlawfulness of a comment may be expressed not only through text, but also in the form of images, audio, or video.

Beyond the above, the Publisher may also remove comments or content that do not qualify as unlawful but are harmful or pose a threat to individual (primarily personality) rights, constitutional values, or civilized public discourse.

4. Procedure for Handling Unlawful Comments

In the event that the reader notices unlawfulness of any comment posted in response to content on the Publisher's online platforms, they may report it to the Publisher, who will promptly investigate the matter and, if the comment is found to be unlawful, remove it.

The Publisher receives such reports at the following contact address:

E-mail address: blpress@blpress.hu

The unlawfulness of comments is reviewed by the Publisher's staff through human moderation, and any unlawful content is identified and removed within a reasonable time, but no later than 24 hours. The Publisher, following due consideration and applying a gradual approach, is entitled to temporarily or permanently revoke the commenting rights of users who repeatedly post unlawful comments. A person whose comment has been deemed unlawful by the Publisher and, as a result, has had their comment removed or their commenting rights revoked, may file a complaint by sending an email to the Publisher at blpress@blpress.hu within 8 days. The complaint must identify the offensive comment in a documented manner with a photo or screenshot (in an identifiable way), as well as the content to which it relates. The complaint must identify the post (in an identifiable way) and the content in relation to which it was published, documented by a photo or screenshot. Furthermore, the complainant must explain their argument as to why their comment is not unlawful and why the Publisher's decision is unfounded. Based on this, the Publisher will review its decision within 5 days. If the complaint is well-founded, the Publisher will promptly restore the comment, but no later than within 3 days. The Publisher shall promptly inform the complainant of its decision. In case of an unfavorable decision, the notification shall also include information that the complainant may seek judicial remedy. The commenting reader may, at their own discretion, directly approach the court in addition to the Publisher's complaint handling procedure.

5. Final Provisions

The Publisher shall prominently notify readers of this Policy on all platforms where comments can be written and displayed, and shall make the Policy easily accessible and user-friendly in the profile summary by providing a direct external link.

This Policy shall apply from the date of its signature and shall remain in effect until revoked.

Budapest, April 1, 2025

Dr. Gergely Ferenc Dobozi

Managing Director

BL Nonprofit Ltd.

BL Nonprofit Kft.

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