

Cepal Hellas Financial Services S.A.

Data Protection Policy

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1. Introduction

This policy establishes the terms and conditions that “Cepal Hellas Financial Services Single Member S.A. - Servicing of Receivables from Loans and Credits” (hereinafter “Cepal”) complies with, ensuring the protection of natural persons whose personal data is processed in the course of Cepal’s activity, in accordance with Cepal’s licensing and operational purpose.

1.1. Scope of Application

The adherence to this Policy, as well as to all policies and procedures adopted by Cepal, is mandatory for all employees of Cepal.

1.2. Definitions

"personal data" means any information relating to an identified or identifiable natural person;

"personal data processing" means any act or series of acts performed on personal data, whether or not by automated means, such as their collection, recording, organization, structuring, storage, adaptation or alteration, recovery, use, disclosure by transmission, dissemination, or otherwise making them available, aligning or combining, restricting, erasing or destroying them;

"data subject": means the identifiable natural person who can be identified, directly or indirectly, in particular with reference to an identifier, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

"controller" means the natural or legal person, public authority, agency or other body which, alone or in conjunction with others, determines the purposes and means of processing of personal data;

"processor" means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

2. Collection and processing of Personal Data

Personal data processed by Cepal includes data that has been collected by the Bank which granted the Loan and/or Credit Facility (the “Receivables”), as well as data collected from the following sources:

- Beneficiaries to whom the Receivables were sold and transferred.
- Servicers operating under article 1 par. 1(a) of Law 4354/2015, as currently in force.
- Attorneys-at-law, law firms, court bailiffs and notaries public.
- Debt notification companies under Law 3758/2009, as in force.

- Financial Databases, e.g. Teiresias S.A.
- Publicly accessible sources, such as phonebooks, the Internet etc.
- Data collected directly from the data subjects.

The Personal data processed by Cepal concerns the following:

- Certification and verification of your identity ("Know Your Customer" – "KYC"), contact information (postal and e-mail address, fixed phone, mobile phone etc.);
- Your family and financial status, including information such as profession, earnings, dependent members, income tax returns, other tax and income related documentation, solvency, as well as any other data provided by the data subject (including data that concerns one's personal status, as well as special categories of data collected directly by the data subjects in accordance with the provisions of the law, such as their own or their dependent family member's medical data), or otherwise data collected from publicly accessible sources for the purposes of the Code of Conduct under Law 4224/2013 of the Bank of Greece;
- Data derived from the performance of one's agreement(s) with the Banking Organization that granted the loan and/or credit facility,
- Data concerning phone conversations' records, which are recorded in accordance with legal requirements;
- Payment history relating to your debt and payment services data;
- Letters or extrajudicial notices exchanged in relation to one's debt;
- Video data from CCTV system of Cepal's premises, in accordance with the legal requirements.

Cepal processes the above personal data only to the extent necessary for the purposes mentioned in clause 3 hereof.

2.1. Personal Data of Minors

Cepal does not process personal data belonging to underage natural persons, i.e. individuals under the age of eighteen (18), for any business purposes, since Cepal does not offer services to such individuals.

2.2. Special Category Data

Cepal processes special category data, such as medical data, only upon the request and with the explicit consent of the data subjects, and only to the extent required in order to offer the best possible amicable solution, especially in the case of vulnerable groups.

3. Legal Basis for the Personal Data Processing

Cepal processes personal data in accordance with the provisions of the General Data Protection Regulation (EU) 2016/679 and the applicable legislation (L. 4624/2019, as in force) for one or more of the following reasons:

A. The execution of a contract

Cepal processes personal data in the context of its business transactions and in order to fulfill its obligations under the contracts it has agreed with its clients.

B. Compliance with a Legal or Regulatory obligation

Cepal processes the aforementioned data in compliance with the following legal and supervisory obligations applicable to Cepal deriving from Law 4354/2015 and the Act of the Executive Committee of the Bank of Greece No 118/19.5.2017, as in force from time to time:

- The Code of Conduct of the Bank of Greece (Decision of the Credit and Insurance Committee No 195/1/29.7.2016 and articles 1 and 4 of Law 4224/2013, as in force, and any other regulatory and executive act or decision, issued in relation to the above);
- The BoG Act No 2501/2002 and the Act of the Executive Committee (AEC) No 157.1/2019 of the Bank of Greece, as in force (which dictate obligations for the provision of information and transparency in general, as well as obligations for the handling of debtor's requests and complaints);
- The legal and regulatory framework on the prevention of the use of the financial system for the purposes of money laundering or terrorism financing, as in force (in particular, Law 4557/2018, Decision of the Banking and Credit Committee No 281/5/17.3.2009 of the Bank of Greece, as well as all other relevant Acts, Decisions and executive circulars of any competent authority);
- Article 8 of Law 3758/2009, as currently in force, which imposes the obligation to record telephone communications with debtors, within the context of informing them of overdue debts. Any such recorded telephone communications, as well as files on record containing the data of the relevant telephone communications (article 6 par. 7 of Law 3758/2009, as in force), will be kept for one (1) year.
- The filing of supervisory reports to the Bank of Greece and the conduct of audits by the Bank of Greece.

C. For the protection of legitimate interests

Cepal processes one's personal data for the purposes of the legitimate interests pursued by Cepal or third parties. Such processing takes place provided that such interests are not superseded by the interests or fundamental rights and freedoms of the data subject which would require protection of personal data.

Such processing includes, indicatively, the following:

- Servicing of the Receivables assigned to Cepal
- Establishment of legal claims and preparation of defense litigation in court proceedings

- Procedures that will ensure the security of Cepal's IT Department and its systems, for the prevention of any possible criminal acts, the security of its assets, the monitoring of administrative controls, and protective measures against violations
- The installation of monitoring systems (closed-circuit cameras - CCTV), e.g. at the entrance of our facilities, to prevent criminal activities.
- Procedures for the management of our activities and for the further development of our products and services
- Notification/exchange of one's personal data within Cepal for the purposes of updating/verifying one's personal data in accordance with the relevant compliance framework
- Risk Management by Cepal

D. Upon consent

In case the consent of the data subject has been obtained (except for the reasons listed above) the legality of the processing is based on such consent. The consent may be withdrawn at any time through a relevant declaration to Cepal. However, the withdrawal of consent shall not affect the lawfulness of processing based on consent prior to its withdrawal.

E. For Cepal Staffing

Cepal processes personal data of natural persons (data subjects) for the purposes of recruitment.

4. Personal Data Recipients

During the performance of its legal/regulatory obligations, Cepal may forward personal data to Cepal employees within the context of their tasks, to service providers (processors or subprocessors), to tax and supervisory authorities, or to any person or entity the legal or regulatory provisions specify.

All employees are required to adhere to the confidentiality principles and the provisions of both the GDPR and the relevant national legislation.

Service providers are contractually bound to respect confidentiality and data protection legislation.

Under the aforementioned circumstances, the personal data recipients may indicatively be:

- Supervisory and other regulatory and public authorities, to the extent such an obligation is stipulated by the law, e.g. the Bank of Greece and Investigation/Prosecution Authorities
- Non-performing loans servicing companies
- Debt notification companies under Law 3758/2009, as in force
- Law firms and/or legal counsels

- Court Bailiffs
- Notaries Public
- Debt collection Organizations
- Teiresias S.A.
- Financial and Business Consultants
- Auditors and accountants
- Companies processing/clearing payments with cards
- Archiving, storage and file management companies
- Cloud services providers
- Insurance companies
- Companies providing webhosting services

For the purposes of Cepal's compliance with the legal and regulatory framework in force, or for the protection of its rights, personal data mentioned above may be disclosed to companies, organizations, public authorities, or the Anti-Money Laundering Authority (Greek Financial Intelligence Unit).

5. Sharing personal data outside the EEA

Cepal does not transfer personal data to any third countries [i.e. countries outside the European Economic Area].

6. Automated decision-making, profiling

Cepal does not apply any automated decision-making processes. The automated processing of specific data for the purposes of evaluating certain aspects (limited profiling) is always done with human oversight.

7. Marketing activities and relevant profiling

Personal data processing and limited profiling (always with human oversight) is possible only for the purpose of informing debtors for various products and solutions for their debt.

Data subjects are entitled to oppose the use of their personal data for Marketing purposes, including profiling, by contacting the Company in writing, at dpo@cepal.gr

8. Retention of personal data

Personal data processed by Cepal for any reason must not be kept for longer than is necessary for the business purpose for which it was collected and used, or for longer than is necessary for Cepal to comply with regulatory or legal requirements.

In particular, personal data is retained for as long as a transactional or other form of relationship exists with the data subjects. Once the transactional relationship is completed, personal data may be retained for:

- Five (5) or, as the case may be, six (6) years from the last transaction – a Bank of Greece stipulation.
- Ten (10) years for tax records.

Personal data may be retained for a longer period of time, if the erasure thereof is not possible for legal or regulatory purposes.

All Cepal employees that are responsible for the collection, storage or processing of personal data, must regularly evaluate whether the data is still necessary for the fulfilment of the business purpose for which it was originally collected, according to the Document Retention Policy of the Company.

Cepal has configured its IT systems so that the collection, creation, or updating of files that contain personal data will be recorded, as well as the erasure or archiving of these files, based on the Files Retention Program.

The retention period is prolonged for as long as a case is pending before a court of law.

9. Personal Data Security

Cepal applies all appropriate technical measures such as anonymization, pseudonymization, data encryption, firewalls, privacy by design and by default, and other organizational safeguards, such as strict access policies to systems, employee confidentiality agreements, training of personnel, periodical inspections etc. Each employee with access to personal data must use it exclusively to serve the above purposes.

Cepal's employees are obliged to comply with the policies and procedures relating to personal data protection which are posted in the Company's Documents' Library, and to observe the safeguards.

10. Data Subjects' Rights

Personal data protection legislation grants data subjects the following rights:

- **Right of Access:** the data subject is entitled to be informed of the data Cepal has collected and the way they are processed, their origin, purpose and legal basis of processing, any recipients or categories of personal data recipients, mainly in third countries, as well as the retention period for such data.

- **Right to Rectification:** the data subject is entitled to file a rectification request of any inaccurate personal information, so as to render such information accurate. The data subject files the relevant request to Cepal with the accurate personal data.

- **Right to Provide Supplementary Information:** the data subject is entitled to file request to supplement any missing personal information so as to render its personal data complete. The data subject files to Cepal the relevant statement with its complete personal data.

- **Right to Erasure:** The data subject is entitled to file to Cepal a relevant request in the following cases:

- i. When personal data is no longer necessary in any other manner regarding the purpose for which it was collected or processed.
- ii. When the consent on which the processing of personal data was based is withdrawn and there is no other legal basis for the processing.
- iii. When personal data was processed without the existence of the necessary legal basis.
- iv. When obligated by the applicable law.

- **Right to Restrict Processing.** The data subject is entitled to request the restriction of its personal data processing in the following cases:

- i. The accuracy of the personal data is disputed and until its accuracy can be verified.
- ii. The data subject has objected to the processing of its personal data and is awaiting confirmation from Cepal as to the legitimacy of its personal data being superseded by Cepal for its necessary uses.
- iii. When Cepal no longer needs the personal data for the processing purposes, but such personal data is required by the data subject in order to establish, raise, or support legal claims.

- **Right to object** personal data processing, for direct marketing purposes. This also includes profiling, to the extent it relates to direct marketing.

- **Right to Data Portability.** The data subject's right to acquire and forward its personal data to another controller, which is processed by Cepal in the appropriate format.

- **Right to Withdraw Consent.** The data subject is entitled to non-retroactively withdraw the consent it granted Cepal at any time, in the event the personal data processing was founded on consent. Withdrawal of the consent does not impair the legality of the processing which was based on the consent, before it is withdrawn.

Data subjects may exercise the aforementioned rights by:

- completing and submitting the [relevant form](#) via this website
- Printing, filling out, and sending the relevant form by:
- email: dpo@cepal.gr
- fax: (+30) 2130887787

- mail, to the Customer Services Department of Cepal Hellas at: 209-211 Syggrou Avenue, 17121, Nea Smyrni, Attiki
- visiting the Customer Services Department at Cepal Hellas's registered office: 209-211 Syggrou Avenue, 17121, Nea Smyrni, Attiki

Requests shall be answered within thirty (30) days of receipt, except in extraordinary circumstances, in which case the above deadline may be extended by two (2) more months, if necessary, taking into account the complexity of the request and/or the number of requests. In this case, Cepal will inform the subjects of any extension within one (1) month of receipt of the request, as well as the reasons for the delay.

11. Right to File Complaints

The data subjects are entitled to file a complaint to the Data Protection Authority (DPA), 1-3 Kifissias Avenue, GR 115 23, Athens (<http://www.dpa.gr>).