

NOTICE OF THE COMPANY ORION X SECURITISATION DESIGNATED ACTIVITY COMPANY FOR PERSONAL DATA PROCESSING

The company under the name "**Orion X Securitisation Designated Activity Company**" with registered seat in the Republic of Ireland, (1-2 Victoria Buildings, Haddington Road, Dublin 4, DO4 XN 32), registered with the Ireland Companies Registration Office with Companies Register Number 656384 (hereinafter "**Orion X**"), in its capacity as controller, informs, according to the General Data Protection Regulation (Regulation (EU) 2016/679) and the provisions of Greek Legislation on personal data processing, the debtors of receivables it has acquired in the context of its activities (hereinafter the "**Receivables**"), as well as other persons associated to the Receivables (e.g. guarantors, special or universal successors thereof), for the processing of their personal data with which it proceeds, for the protection thereof as well as for the rights of those individuals.

WHAT PERSONAL DATA WE PROCESS & WHERE WE COLLECT THEM FROM?

Orion X collects and processes the following personal data of the above individuals:

- Full name;
- Loan Agreement/loan account Number from where the Receivables originate;
- TAX ID/VAT Reg. No

The above data was collected by Alpha Bank S.A. in the context of the performance and course of the agreements from which the Receivables originate.

WHY DO WE COLLECT PERSONAL DATA & HOW DO WE PROCESS IT?

Orion X processes the aforementioned personal data:

- i. In order to complete the necessary legal actions and the registration of the relevant agreements for the transfer of Receivables to the public books of the Pledge Registry (article 3 of Law 2844/2000) for the lawful acquisition of Receivables, pursuant to article 10 of Law 3156/2003.
- ii. In order for the Receivables to be assigned to servicers of receivables from loans and credits established under Law 5072/2023 and
- iii. In order to comply with its obligations as prescribed by the applicable legislative framework in force from time to time.

WHO ARE THE DATA RECIPIENTS?

- i. Pledge Registrars;
- ii. servicers of receivables from loans and credits established under Law 5072/2023,

- iii. supervisory, auditing, independent, court, public and other authorities and agencies, in the context of their competencies, duties and powers as stipulated by the law;
- iv. natural persons and/or legal entities, to whom Orion X assigns the performance of specific tasks on its behalf such as lawyers, court bailiffs, property valuers, real estate agents, providers of printing services, document storage services providers, accounting services and IT services providers, analytics services providers, business consultants etc.;
- v. third parties to whom the Receivables may be sold in the future;
- vi. members of the Administration and/or representatives of Orion X, only to the extent required for the acquisition of the Receivables and for the performance of their duties.

TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)

In principal, Orion X does not transfer personal data related to the Receivables outside the EEA. If a transfer of data to a third country is required, it will be performed in accordance with the conditions set out in the General Data Protection Regulation (Regulation (EU) 2016/679) on the establishment of a sufficient security level.

HOW LONG IS PERSONAL DATA RETAINED?

The above personal data that relates to the Receivables is retained until the general statutory limitation period elapses, i.e. as currently provided, for a period of up to twenty (20) years from the complete repayment of receivables, as such period is stipulated by the law from time to time.

In addition, in the event court proceedings are in progress between the data subjects and Orion X, personal data shall be retained until the issuance of an irrevocable court judgement.

WHAT ARE THE RIGHTS OF THE DATA SUBJECTS IN RELATION TO THE PROTECTION OF PERSONAL DATA?

The persons (data subjects) to whom the data processed by Orion X relates, have the following rights:

- i. Right of access;
- ii. Right of rectification of personal data, in case of inaccurate information or in case there is need to complete missing information;
- iii. Right to object to processing;
- iv. Right to restrict processing;
- v. Right to have data erased (right be forgotten);
- vi. Right to data portability to any other controller, under the conditions of the law.

Orion X is in any event entitled to deny the right to restrict, the right to object to processing and the right to have data erased (right to be forgotten) if the processing or retention of data is necessary for the purposes of the acquisition of Receivables, the establishment, exercise or support of its legitimate interests or its compliance with obligations stipulated by the law.

The exercise of the right to data portability (in (vi) above) does not entail the erasure of data from the records of Orion X, which (erasure) is subject to the provisions of the immediate preceding paragraph.

The exercise of the above rights has a future effect and does not concern data processing actions that have already taken place.

In order to exercise the above rights, the data subject may address:

“Cepal Hellas Financial Services Single Member Société Anonyme for the Servicing of Receivables from Loans and Credits” (hereinafter **"Cepal Hellas"**) :

- By sending a letter at the following mailing address:

Cepal Hellas Financial Services Single Member Société Anonyme -Servicing of Receivables from Loans and Credits

209-211 Syngrou Avenue

Nea Smirni, GR 171 21

- Via e-mail at: customerservices@cepal.gr
- In addition, the data subjects are entitled to print via the website of Cepal Hellas <http://www.cepal.gr/policy.htm> the form "Request for the Exercise of Data Subject's Rights" and send it completed by letter to the above address.

Finally, individuals who believe that their rights are infringed in any manner whatsoever, may file a complaint to the Hellenic Data Protection Authority (hereinafter the **"DPA"**). Analytical information in relation to the authority of the DPA and the manner complaints can be filed, are available at the website of the Authority: www.dpa.gr.