

POSEIDON FINANCIAL INVESTOR DESIGNATED ACTIVITY COMPANY
PERSONAL DATA PROCESSING POLICY

1. Introduction

This is the Personal Data Processing Policy (hereinafter the "**Policy**") of the company under the name "**Poseidon Financial Investor Designated Activity Company**" (hereinafter the "**Company**", "**we**" or "**us**"). This Policy contains information in relation to the processing of Personal Data conducted by us, in accordance with our obligations under the Personal Data Protection Legislation.

Capitalised terms used in this Policy will have the meaning attributed to them in the Definitions set out in Annex 1 hereof.

2. Purpose – Legal Framework

The purpose of this Policy is to explain the type of Personal Data we process, the manner and the reasons for processing such data and to describe our duties and obligations in relation to the protection of the said Personal Data. The manner in which we process Personal Data may change from time to time and consequently, this Policy shall be respectively updated in order to be in line with any modified practices.

In order to meet our transparency obligations established by Personal Data Protection Legislation, we will incorporate this policy with reference to the various data collection points used by us.

According to the terms and conditions of the Private Agreement for the Servicing of Receivables dated 16.12.2022, as amended and in force from time to time, the Company has assigned to "CEPAL HELLAS FINANCIAL SERVICES SINGLE MEMBER SOCIÉTÉ ANONYME - SERVICING OF RECEIVABLES FROM LOANS AND CREDITS", with the distinctive title "CEPAL HELLAS", a designated activity company for the servicing of receivables from loans and credits pursuant to Law 5072/2023, lawfully established in accordance with the Greek Law, registered with the General Commercial Registry with Reg. No 138019601000 (hereinafter the "**Servicer**" or "**Cepal Hellas**"), the servicing of certain business receivables of part of the Greek law loan portfolio belonging to the Company.

3. The Company as Controller

The Company will act in the capacity of the Controller in relation to the Personal Data provided to us by (a) various individuals in the context of the management, operation and administration of the Company and (b) the Servicer, in relation to the underlying debtors

and the persons associated therewith, in the context of the servicing of debts under the Greek law loan portfolio belonging to the Company. The said natural persons are sententiously the following:

- Members of the administration, employees and officers of the Company,
- Employees of service providers rendering services to the Company and
- Debtors who have concluded credit agreements with Alpha Bank Société Anonyme (or a party associated therewith) as well as any third parties who have granted any guarantees/securities for the relevant agreements as well as natural persons associated with legal entities-debtors,
(each a "Data Subject").

The Company processes Personal Data for the following purposes:

Purpose of Processing	Basis of Processing
Compliance with legal and regulatory obligations in force from time to time for the Company, including but not limited to the applicable tax legislation and the laws on money laundering and terrorism financing (AML-TF).	Compliance of the Company with its obligations under the law
The management and servicing of part of the agreements portfolio that derived from Alpha Bank Société Anonyme (or predecessors thereof) and were sold to the Company and the exercise of the relevant rights thereof by virtue of which the Company acquired the loans and assigned their servicing to the Servicer. The operation of the employment agreements or services agreements and in general, of the relationships between the Company and its employees, officers, members of the administration as well as employees of services providers of the Company.	For the purposes of performing an agreement

4. The Company and the processors

The Company will assign to specific service providers (the processors) the performance of certain services on its behalf, which may include processing of Personal Data. To the extent such processing is conducted based on the directions of the Company and entails the creation of a relationship between the Controller and the Processor, the Company will ensure that the said relationship is governed by an agreement that includes the provisions on Personal Data provided for by the Personal Data Protection Legislation.

The Servicer will act as a separate and independent controller in relation to the Personal Data of debtors, guarantors and natural persons associated with legal entities-debtors. Information should also be provided via the Form of Information on the Processing of Personal Data by the Servicer for information in relation to the processing of Personal Data of debtors, guarantors and natural persons associated with legal entities-debtors.

5. Records Keeping

In the context of our obligation that relates to the keeping of data processing records according to Article 30 of the GDPR, the Company keeps a record for Processing Activities under its care in accordance with the provisions of the said Article.

6. Personal Data – Special Categories

The Company does not collect or process any Special Categories of Data. In the event it will proceed with the said collection and Processing under certain limited conditions, it will process the said Personal Data in accordance with the Personal Data Protection Legislation.

7. Rights of Data Subjects

The Personal Data Protection Legislation offers certain rights to the data subjects. The said rights are the following (hereinafter the "**Data Subject's Rights**"):

- The right of the data subject to receive detailed information on the processing (by virtue of the transparency obligations undertaken by the Controller);
- The right to access Personal Data;
- The right to modify, rectify and complete inaccuracies in Personal Data;
- The right to have Personal Data erased (right to be forgotten);
- The right to data portability;
- The right to restrict processing;
- The right to object to processing which is based on the pursuit of legitimate interests and
- The right to object to the automated decision-making, including profiling.

The said rights of the Data Subjects may be exercised subject to the restrictions provided for by the Personal Data Protection Legislation. In certain cases, it may not be possible for the Company to satisfy the relevant rights. The Data Subjects are entitled to file to the Company a written request which is associated with the management of their Personal Data, to the

Customer Service and Complaints Management Centre of the Servicer, at 209-211 Syngrou Avenue, GR-17121, Nea Smirni or by email at customerservices@cepal.gr. The relevant requests will be handled in accordance with the Personal Data Protection Legislation.

8. Personal Data – Security and Breach

The Company undertakes to keep confidential, according to the provisions of Personal Data Protection Legislation, all Personal Data provided to it by the Servicer.

Respectively, we and the service providers we use, apply technical and organisational measures for the protection of Personal Data against any illegal or unauthorized destruction, loss, modification, disclosure, acquisition or access. Personal Data is securely kept via the application of a series of appropriate safeguards.

The Controllers are obligated to communicate to the Data Protection Authority and the Data Subjects affected specific cases of breach of the security of Personal Data. Breach of Personal Data is the security breach leading to accidental or illegal destruction, loss, modification, unauthorized disclosure or access to Personal Data that was forwarded, stored or processed in any other manner. A breach incident that occurs in relation to the Personal Data controlled by the Company will be handled in compliance with the provisions on Personal Data Protection Legislation.

9. Disclosure of Personal Data

We might communicate Personal Data (a) to third parties or allow third parties to gain access to Personal Data that we process for the purposes of compliance with the applicable legislation and (b) to authorised persons, consultants, service providers, agencies, certified auditors-accountants, technology services providers and any affiliates or subsidiaries of the above persons for the same or respective purposes.

10. Personal Data Retention Period

We will retain Personal Data:

- Throughout the relationship of the Company with the Data Subjects and after the termination thereof, in accordance with the legal and regulatory obligations of the Company and the applicable policy on records keeping applied by the Company;
- For as long as it is necessary in light of the applicable statutory limitations periods and

- In any other event, only if the retention of the said Personal Data is necessary for the purposes for which the said Personal Data is processed.

11. Transfer of Data outside the European Economic Area (EEA)

The Company may forward from time to time Personal Data to companies outside the EEA, who may not have the same or equivalent laws of Personal Data Protection with Ireland. The Company will ensure that the relevant processing of Personal Data will be conducted in compliance with the provisions of the Personal Data Protection Legislation in the event any such transfer is performed.

12. Information

For any further information in relation to the Policy and/or the Personal Data Processing by or on behalf of the Company, you may address any queries in writing to the Customer Service and Complaints Management Centre of Cepal Hellas, at 209-211 Syngrou Avenue, GR-17121, Nea Smirni or by email at customerservices@cepal.gr and then, if you so wish, to the competent Authority.

ANNEX 1

"Type of Personal Data" means for the debtors and the persons associated therewith, the name, postal address and residence address, e-mail address, telephone number, beneficiary's name, nationality, date of birth, account number, bank account details, debt details, Tax ID No etc.

"Special Categories of Personal Data" means the Personal Data that reveals any of the following information in relation to an individual: racial or ethnic origin, political ideology, religious or philosophical beliefs or participation in trade unions. Special Categories of Personal Data also include the processing of genetic data, biometric data (such as fingerprints, face images), data relating to health or data relating to sexual life and orientation and Personal Data related to criminal convictions and offences.

"Processing" is any act or series of acts performed with or without the use of automated means to Personal Data or groups of Personal Data such as the collection, entry, organisation, assembly, storage, adaptation or change, retrieval, search for information, use, disclosure via transfer, dissemination and any other form of disposal, correlation or combination, restriction, erasure or destruction. The terms **"Process"** and **"Processing"** shall be respectively interpreted.

"European Economic Area" or **"EEA"** means Austria, Belgium, Bulgaria, Croatia, Republic of Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, Iceland, Lichtenstein and Norway.

"Personal Data Protection Legislation" means the General Data Protection Regulation (2016/679) (**"GDPR"**) and the Regulation (EC) 2018/1725 as well as any other laws that may apply to the Company in the context of Personal Data Processing.

"Personal Data" means any information which relates to a living individual, based on which the said individual may be identified. Personal Data may include: (a) name and identification details, (b) location data or (c) any other information specifically related to the particular individual.

"Controller" means the entity who alone or jointly with others, determine the purposes and the means for Personal Data Processing.