

## LANA SECURITIZATION S.À R.L. DATA PRIVACY NOTICE

### 1. Purpose of Notice

Lana Securitization Sarl, a company incorporated in Luxembourg, registered number B229006, registered address 7 rue de la Chapelle, 1325 Luxembourg, Luxembourg ("**Beneficial Owner**", "**we**", "**our**", "**us**") is beneficial owner of a portfolio of mortgage loans. This data privacy notice sets out details of how personal information relating to you, as a borrower, guarantor or security provider with respect to a loan in the portfolio, or as an officer, shareholder or beneficial owner thereof ("**Personal Data**") will be handled by us, if and to the extent we may process such Personal Data (as specified in Section 4 of this data privacy notice below), and/or on our behalf by our credit servicers and advisers in accordance with our duties and with the General Data Protection Regulation ("**GDPR**") and applicable local laws.

### 2. Contact Us

If you have any questions in relation to the use of your Personal Data or would like to submit a request with respect to your rights listed below, please contact us, by email, at [customerservices@cepal.gr](mailto:customerservices@cepal.gr) specifying in the subject line "Lana Securitization Sarl - Data Protection Request", or by letter to Lana Securitization Sarl, Data Protection Requests, c/o Cepal Hellas Financial Services Single Member Société Anonyme -- Servicing of Receivables from Loans and Credits, 209-211 Syngrou Avenue, Nea Smirni, GR 171 21.

### 3. Changes to this Notice

We may update this data privacy notice from time to time.

### 4. Personal Data Processed by us

We, as Beneficial Owner, are a controller of your Personal Data as provided to us by the original lender, an owner of the loan and appointed credit servicing firm, including information provided in the original application for your mortgage loan and information that we generate or may obtain from third party sources. This information will include:

- a. Information you provide:** this includes name and address (including proofs of name and address), contact details, date of birth, gender, nationality, photograph, signature, occupational history, marital status, dependents, job title, income, assets, other financial information (such as details of expenditure), bank details (including bank account statements), personal public service number, tax residency and tax identification information.
- b. Special Categories of Data provided to us;** in the event you voluntarily disclose information regarding a vulnerable status in context of circumstances that might affect repayment or enforcement of the loan or security.
- c. Information that we obtain from third party sources;** This might include information obtained from public websites, social media and information received from intermediaries to the extent permitted by applicable local laws.

Such third parties include:

- Credit reference agencies
- Third parties that provide information regarding international economic sanctions, background and government official/ prominent public function status
- Agencies that perform asset traces or occupancy checks

## 5. Why We Process your Personal Data

We collect and process your Personal Data on various legal basis for different purposes, including those set out below.

Legal Basis	Purpose(s)
<p><b>Performance of a Contract</b> Where we are parties to a contract, we may process your information in the management of our investment in the portfolio</p>	<ul style="list-style-type: none"> <li>• This will include, without limitation, the performance and exercise of contractual rights, duties and obligations, monitoring the performance of your loan, monitoring payments &amp; reviewing requests for forbearance, maintaining and providing information to service providers and advisers as necessary. This involves the Beneficial Owner, its credit servicer mentioned below, and its adviser Lapithus Management Sarl and its subsidiaries ("Lapithus") which provides advisory and monitoring services.</li> </ul>
<p><b>Legitimate Interests</b> In order to exercise or preserve our legitimate business interest(s) of a type indicated in the next column</p>	<ul style="list-style-type: none"> <li>• In order to transfer your loan, or in relation to a possible transfer of your loan, to another party, pursuant to a contract in which we agree that the other party must comply with legislation and regulations on personal data protections.</li> <li>• To make relevant disclosures in the course of a potential merger or acquisition.</li> <li>• To validate and verify information for security purposes, and to protect ourselves against legal risk, including for the prevention of fraud.</li> <li>• To manage our services, including monitoring and resolving complaints.</li> <li>• To send relevant administrative information or permit the processing of such information by the appointed servicer, advisor and their successors.</li> <li>• To exercise or defend a legal claim, including in the context of litigation, arbitration and similar proceedings against the firm, its agents or directors or its employees in connection with the loan or in connection with any potential claim or proceedings.</li> <li>• The matters set out in the Compliance with Legal Obligations column below where this is also done for the purpose of protecting our legal rights.</li> </ul>
<p><b>Compliance with Legal Obligation</b> In order to comply with our relevant legal and regulatory obligations</p>	<ul style="list-style-type: none"> <li>• To ensure compliance with our business, tax and regulatory obligations, including its related reporting obligations, the management of its credit and mortgage loans and other related obligations imposed upon us and our servicer(s).</li> <li>• To assist our auditors in auditing in accordance with legal obligations.</li> <li>• To investigate, detect, prevent or assist the competent authorities in the prosecution of crimes in relation to the prevention of fraud, tax evasion, money laundering and/or terrorist financing.</li> <li>• To share data with law enforcement, tax authorities or other government and fraud prevention agencies where we have a legal obligation and complying with production, authority and/or court orders.</li> </ul>
<p><b>Special Categories of Data – voluntary disclosures regarding vulnerability condition</b></p>	
Legal Basis	Purpose

Your explicit consent	<ul style="list-style-type: none"> <li>• Consideration of your requests or proposals in support of which you chose to provide health condition related data</li> </ul>
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Please note that you have a right to object to the processing of your Personal Data where that processing is carried out for our legitimate interests or to withdraw your consent, where we rely upon your consent for processing the special categories of data specified above. In such case, the withdrawal of your consent shall not affect the lawfulness of processing based on consent before its withdrawal.

If you do not provide the Personal Data or withdraw consent for processing special categories of Personal Data, as specified above, we may not be able to support the provision of services you require.

## 6. Third Party Recipients of your Personal Data

We may disclose your Personal Data to our relevant service providers and/or other third parties including:

- Cepal Hellas Financial Services Single Member Société Anonyme -- Servicing of Receivables from Loans and Credits, 209-211 Syngrou Avenue, Nea Smirni, GR 171 21 as credit servicer, Lapithus, acting as a data processor, and their affiliates and other service providers;
- our auditors and their successors;
- our legal advisors;
- appointed receivers;
- asset trace investigators;
- estate agents;
- shareholders, investors, purchasers and potential investors of loans in the portfolio;
- our corporate administrators including the company secretary;
- the bank through which your payments are processed;
- the national tax and revenue authorities;
- the police and law enforcement authorities.

We or our service providers may also disclose your Personal Data to any other persons or entities as agreed between us and the relevant service provider, or as may be required or expressly permitted by applicable laws, such disclosure being subject, where required, to entry into appropriate agreements and/or contractual clauses.

## 7. International Transfer of your Personal Data

The disclosure of your Personal Data to the third party recipients set out above may involve the transfer of data to other EU countries, the UK, which is the subject of an adequacy decision by the EU Commission, and other jurisdictions outside the European Economic Area ("EEA"). Such countries may not be subject to equivalent data protection laws as countries within the EEA. Any transfer of your Personal Data to jurisdictions outside the EEA may only occur in accordance with the requirements of the GDPR. For example, in connection with any transfer of your Personal Data to jurisdictions outside the EEA and UK, we have authorised Lapithus as our delegate, to enter into standard contractual clauses (a copy of which is available at [https://eur-lex.europa.eu/eli/dec\\_impl/2021/914/oj](https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj)), as prescribed under the General Data Protection Regulation, with relevant parties to whom your Personal Data will be transferred, unless there is a separate valid ground under the GDPR for such transfer.

## 8. Retention of your Personal Data

We will retain Personal Data for as long as necessary or permitted in light of the purpose(s) for which it was obtained. The criteria used to determine the retention periods are:

- the duration of your loan relationship;
- whether there is a legal obligation to which we or appointed servicers are subject, such as retaining information collated in accordance with any applicable Bank of Greece, Luxembourg Central Bank or securitisation regulations, or under anti-money laundering legislation or applicable taxation or corporate audit rules and regulations; and
- whether retention is advisable in light of our legal position, such as with respect to applicable limitation periods or actual or potential litigation, claims, complaints or regulatory investigations.

## 9. Your Data Protection Rights

You have a number of rights in relation to your Personal Data, which are set out in the table below. Note that in certain circumstances these rights might not be absolute (i.e., under the GDPR and/ or applicable local law exceptions).

Right	Further Information
<b>Right of Access</b>	You have the right to request a copy of the Personal Data held about you and to access the information which we hold about you as controller. We may charge you for making such an access request where we believe your request is unjustified or excessive.
<b>Right to Object</b>	You have a right to object at any time to the processing of your Personal Data where we process your Personal Data on the legal basis of pursuing our legitimate interests.
<b>Right to Rectification</b>	You have the right to have any inaccurate Personal Data which we hold about you updated or corrected.
<b>Right to Erasure</b>	In certain circumstances, you may also have your Personal Data deleted, for example if you exercise your right to object (see above) and we do not have an overriding reason to process your Personal Data or if we no longer require your Personal Data for the purposes as set out in this data privacy notice.
<b>Right to Restriction of Processing</b>	You have the right to ask us to restrict processing of your Personal Data in certain cases, including if you believe that the Personal Data is inaccurate or use of your information is unlawful. If you validly exercise this right, we will store your Personal Data and will not carry out any other processing until the issue is resolved.
<b>Right to Data Portability</b>	You may in certain cases request to provide you with your Personal Data which you have given us in a structured, commonly used and machine- readable format and to transmit it directly to another data controller where this is technically feasible. This right arises in cases specified in the GDPR and applicable law.

Should you consider that the processing of your Personal Data by us or our service providers infringes the provisions of the General Data Protection Regulation and/ or applicable local law rules, you may lodge a complaint with a supervisory authority in the EU Member State of your habitual residence, place of work, or in the place where an alleged infringement occurred. In Greece, you may contact the Hellenic Data Protection Authority (1-3 Kifissias avenue, 115 23, Athens Greece) ([www.dpa.gr](http://www.dpa.gr)). You may contact us in the first assistance should you have a query or complaint (in the contact details under section 2 above).