

NOTICE OF THE COMPANY IMOLA NPL FINANCE DESIGNATED ACTIVITY COMPANY FOR PROCESSING OF PERSONAL DATA

The company under the name Imola NPL Finance Designated Activity Company with registered seat in the Republic of Ireland, (3rd Floor, Waterloo Exchange, Waterloo Road, Dublin 4, D04 E5W7, Ireland), registered with the Companies Register Number 785483 (hereinafter «Imola»), in its capacity as controller, informs the persons related in any manner whatsoever with loans, credits, security interests and other consequential or formative rights it has acquired in the context of its activities (the “**Receivables**”) for the processing of their personal data and their rights, in accordance with the General Data Protection Regulation (EU) 2016/679 and the provisions of Greek legislative framework on personal data processing.

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

Imola collects and processes the following personal data relating to persons associated in any manner with the Receivables (including but not limited to: borrowers, guarantors, third parties granting security interests, special or universal successors of the above, partners of legal entities or their legal representatives, process agents or proxies or attorneys-at-law of the above, notaries public, court bailiffs, as well as persons against whom Imola may claim the collection of the Receivables, e.g. third parties at whose hands a confiscation may be enforced or against whom an offset right may be exercised):

- i. identification and communication data e.g. full name, ID Card or Passport number, Tax ID Number & relevant Tax Office, date of birth, gender, age, residence address, telephone number, e-mail, contact details with our assignors and/or servicers of Receivables etc.;
- ii. data relating to the Receivables e.g. number and details of loan agreement/loan account, loan/credit amount, any security interests, debit balance, payments etc.;
- iii. data relating to personal and financial status, e.g. profession, taxes, real estate as well as family information to the extent these relate to the Receivables.

The data we process had initially been lawfully collected by our assignors in the context of the performance of the agreements out of which the Receivables are arisen or/and are collected by the servicers of the Receivables or by third parties (e.g. attorneys-at-law, court bailiffs, debt notification companies under Law 3758/2009). In addition, such data may be collected by publicly accessible sources.

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

Imola processes the aforementioned personal data in order to:

- i. complete the necessary legal actions and the registration of the relevant assignment agreement to the public books of the Pledge Registry (article 3 of Law 2844/2000) for the acquisition of Receivables, pursuant to article 10 of Law 3156/2003;
- ii. assign the management of the Receivables with credit servicers of Law 5072/2023;

- iii. fulfil its purpose of safeguarding its legitimate interests consisting in the recovery of Receivables and
- iv. comply with its obligations under the legislative framework applicable from time to time.

WHO ARE THE DATA RECIPIENTS?

- i. Credit servicers under Law 5072/2023;
- ii. Supervisory, auditing, independent, judicial, public and other authorities and agencies within the scope of their statutory powers and duties;
- iii. Natural or/and legal persons, to whom Imola assigns the performance of specific tasks on its behalf such as lawyers, court bailiffs, appraisers, real estate agents, providers of services of printing, document storage, IT solutions and analytics, business consultants;
- iv. third parties to whom the Receivables may be sold in the future;
- v. members of the management or/and representatives of Imola or and related advisors or investment portfolio managers, only to the extent necessary for the acquisition of the Receivables and the performance of their duties.

To the extent possible and with respect to the individual purpose of processing, the above data transfer will be anonymised so that the data subjects are not identified.

In the event third parties will have access the personal data of the data subjects, adopt the necessary contractual, technical and organisational measures will be adopted in order to ensure that the personal data of the data subjects will not undergo processing save as such processing is required.

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

In principle, Imola does not transfer personal data related to the Receivables outside the European Economic Area. If so required, the data transfer to a third country will be performed in accordance with the conditions laid down by the General Data Protection Regulation (EU) 2016/679 to ensure an adequate level of security.

FOR HOW LONG WILL THE PERSONAL DATE BE RETAINED?

The above personal data related to the Receivables are retained until the lapse of the general statute of limitations for claims, i.e. for a period of up to twenty (20) years from full repayment of claims, as amended from time to time.

In addition, in the event that judicial proceedings are in progress between the data subjects and Imola, the personal data are kept until the issuance of an irrevocable court decision.

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 Imola relate, have the following rights:

- i. Right to access;
- ii. Right to rectify personal data, in the event of inaccurate information or in case of need to supplement incomplete data;
- iii. Right to object when, for reasons attributed to the particular condition, data processing is no longer justified which may however be necessary for the purposes of the legitimate interests pursued by Imola;
- iv. Right to restrict processing;
- v. Right to have personal data erased (right to be forgotten) subject to the requirements set out by law;
- vi. Right to data portability to any other controller subject to the requirements set out by law.

Imola 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 promotion of its legitimate interests, its legal rights 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 Imola, which (erasure) is subject to the provisions of the immediately preceding paragraph.

The exercise of such rights has an effect ex nunc and does not apply to data processing already carried out.

In order to exercise the above rights, the data subject may contact in writing «**Cepal Hellas Financial Services Single Member Société Anonyme - Servicing of Receivables from Loans and Credits**»

- by sending a letter to the postal address:

Cepal Hellas Financial Services Single Member Société Anonyme - Servicing of Receivables from Loans and Credits 348 Syngrou Avenue, Kallithea, GR 176 74, or

- by e-mail at: customerservices@cepal.gr,

- in addition, the data subject may print via the website of Cepal Hellas <http://www.cepal.gr/policy.html> the Exercise of Rights form and send it completed by post to the above address.

Finally, in the event the data subjects believe that their rights are infringed in any manner, they may file a complaint to the Hellenic Data Protection Authority (DPA). Detailed information on the competence of the Authority and on how to submit a complaint can be found on the Authority's website: www.dpa.gr (Citizens > My rights > Submit a complaint).