



# Cepal Hellas

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## Data Protection Policy



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## 1. Introduction

Cepal Hellas Financial Services S.A. ("**Cepal**"), with headquarters at 348 Syngrou Avenue, 17674, Kallithea, Attica, Greece., collects and processes personal data, as a Data Controller, for the purposes described in this Data Protection Policy (the "Policy") in accordance with the General Data Protection Regulation ("GDPR") and the applicable Greek legislation, including Law 4624/2019 on the protection of personal data, while taking the appropriate technical and organizational measures to protect personal data.

### 1.1. Scope

The adherence to this Policy as well as of all policies and procedures of Cepal is mandatory for all employees. This Policy applies in conjunction with the rest of Cepal's existing and future policies and procedures.

### 1.2. Definitions

**"personal data"** means any information relating to identified or identifiable natural person, directly or indirectly. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier.

**"Special categories of personal data"**: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as the processing of genetic data, biometric data for the purpose of uniquely identifying a person, data concerning health, or data concerning a natural person's sex life or sexual orientation.

**"data processing"** means any operation or set of operations performed on personal data, whether or not by automated means such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**"data subject"** means the identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, 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 jointly with others, determines the purposes and means of the 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. Persons that the Policy refers to

This Policy refers to natural persons such as debtors, co-debtors, guarantors, whose debts are included in the receivables portfolios that Cepal is servicing, according to the provisions in the context of the assignment by financial institutions / to be beneficiaries of the debts, as well as to any natural person affiliated with them or/and relating to their debts (such as persons that have provided guarantee or other collateral in favor of the debtor, family members, legitimate representatives, attorneys at law, shareholders and actual beneficiaries of debtors who are legal persons or entities).

In case the debtor, co-debtor and/or guarantor is a legal person or entity, this Policy refers to its representatives, partners, and members of management whose personal data are processed by Cepal for the purposes of servicing this legal person's debt.

## 3. Sources of Personal Data Collection

Personal data processed by Cepal includes data that has been collected by the Bank which granted the Loan and/or the Credit Facility (the "Receivables"), by which the debt arises as well as data collected from the following sources after the assignment of the receivables' servicing:

- Beneficiaries of the Receivables by Credit and Financial Institutions, who are Cepal's clients based on the respective Assignment of Receivables' Servicing Agreements.
- Loan and credit Servicers operating under article 1 par. 1(a) of Law 4354/2015, as currently in force, to whom the personal data may have been transferred prior the assignment of the receivables' servicing to Cepal.
- Attorneys-at-law, law firms, court bailiffs and notaries public.
- Debt collection companies under Law 3758/2009 as in force.
- Economic behavior Databases, such as Teiresias S.A that keeps (address:.1, Alamanas St., Maroussi, Attica, tel: +30 210 3676700, website: [www.tiresias.gr](http://www.tiresias.gr).)
- Publicly accessible sources, such as phonebooks, the Internet, courts, land registers and cadastral offices.



- Public authorities, services and bodies (including the Central Portal of the Public Administration, eGov-KYC and the tax authorities) in accordance with the legal provisions.
- Databases of the General Secretariat for the Financial Sector & Private Debt Management of the Ministry of National Economy and Finance, such as through the Platform for the Protection of Primary Residence and the Platform of the Out-of-Court Debt Settlement Mechanism, in accordance with the provisions of the relevant legal framework.
- Data collected directly from the data subjects in the context of contractual relationship with them.

#### 4. Personal data that Cepal processes

##### 4.1 The Personal data categories that are being processed by Cepal includes the following:

- Certification and verification of your identity such as full name, father's name, identity card/passport or other official identification document number, tax identification number (TIN), nationality, date of birth, and signature. Contact information (such as postal and e-mail address, landline, mobile phone).
- Data concerning family status, such as marital status (married or not), widowhood, dependents, etc.
- Data concerning property and financial status, such as income, earnings, creditworthiness, tax forms E1, E9, ENFIA and tax clearance certificates, certificates of social security and/or tax compliance, documents of ownership or transfer of movable or immovable property, and tax residency;
- Data regarding professional activity, such as profession and work address. 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 following the prior provision of information to debtors about the recording, in accordance with legal requirements of the Law 3758/2009, as in force.
- Data concerning payments history relating to your debt and payment services data.
- Data concerning letters or extrajudicial notices exchanged in relation to debts.
- Data from documents and supporting materials that the clients themselves submit to Cepal Hellas in the context of their transactional relationship with the Company.
- Video data from CCTV system of Cepal's premises where there are the necessary warning signs /notices based on the applicable legal requirements. For more information regarding this processing, you can refer to the corporate website and the Level B information notice for the Company's CCTV system.
- Minors' data only when the necessary legal requirement is met.



- Credit profiling/ credit scoring data from databases on economic behavior such as TIRESIAS S.A. company.
- Data for the assessment of the risk of money laundering and/or terrorism financing.
- Device data, IP address data, navigation data, website usage data, and visitor comments and requests through online contact forms, when they visit and use Cepal's website.
- Data included in reports submitted through the whistleblowing reporting and monitoring system. For more information regarding this processing, you can refer to the Company's corporate website [Useful Information – Whistleblowing Reporting Policy].
- Data included in requests, complaints, or grievances submitted to the Company through its communication channels.
- Data of minors, only where the legal conditions are met.

#### 4.2. Special Category Data

Cepal collects and processes special category data, such as health condition data of debtors or/ and debtors' dependent family members, only upon the request of the data subjects and on their own initiative, only to the extent required in the context of applying the Code of Conduct under Law 4224/2013 of the Bank of Greece, as well as any other regulatory or implementing act or decision issued in relation to the above, in order to offer the best possible amicable solution, especially in the case of vulnerable groups of persons or/and when such a processing is necessary for the establishment, exercise or support of Cepal's legal claims. Cepal processes the aforementioned special categories data having taken the appropriate technical and organizational measures for their secure keeping and processing.

### 5. Legal basis and Purposes for the Personal Data Processing

Cepal processes the categories of personal data referred to in the preceding sections exclusively within the framework of fulfilling the purposes set out in this Policy. Except for identification and contact data, which are strictly necessary for any transactional relationship with the Company, the type and amount of other data collected and further processed depend on the specific processing purpose in each case and must be adequate, relevant, and limited to what is necessary for that purpose.

In the event that you provide the Company with personal data of third parties, you must have informed them appropriately in advance (for example, by reference to this notice) and obtained their explicit consent where required.



Cepal processes personal data in accordance with the provisions of the General Data Protection Regulation and the applicable legislation for one or more of the following lawful reasons, as determined on a case-by-case basis and according to the nature of the processing:

#### **A. The performance 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 in the context of servicing the debtors' claims.

Furthermore, Cepal processes personal data for the purpose of servicing, supporting, and monitoring the data subject's transactional relationship with the Company, and for the proper performance of the contracts between them, within the framework of managing claims related to loans or credits, the management of which has been entrusted to Cepal by the respective Claim Holder.

#### **B. Compliance with a Legal or Regulatory obligation**

Cepal processes the above data in compliance with the following legal and supervisory obligations to which it is subject as a credit manager, in accordance with the provisions of Law 5072/2023 and the Executive Committee Act no. 225/1/30.01.2024 of the Bank of Greece, as in force, and specifically:

- The Code of Conduct of the Bank of Greece (Decision of the Credit and Insurance Committee No 392/1/31.5.2021 by virtue of Law 4224/2013, as in and any other law, regulatory and executive act or decision, issued in relation to the above).
- Act No 2501/2002 of the Governor of the Bank of Greece and 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 and Suppression of Money Laundering and the Financing of Terrorism, as in force from time to time (including, by way of example, Law 4557/2018, as amended and in force (hereinafter the "AML/CFT Law"), Decision of the Banking and Credit Committee No 281/5/17.3.2009 of the Bank of Greece, 285/6/09.07.2009 of the Bank of Greece, executive Committee Act no. 172/2/29.05.2020 of the Bank of Greece (hereinafter the "AML/CFT Regulatory Framework" and collectively the "AML/CFT Legal Framework"), as in force, as well as all related laws, acts, decisions, circulars, and guidelines issued by any competent authority].

- Article 8 of Law 3758/2009, as amended and in force, which imposes the obligation for the recording of telephone communications with debtors performed for informational purposes for overdue debts.
- The context of filing supervisory reports to the Bank of Greece and conducting of audits by the Bank of Greece.
- The context of responding to debt settlement requests [including, by way of example, requests for inclusion in the Out-of-Court Debt Settlement Mechanism (OCW, Law 4738/2020), requests for participation in the Interim Program of Public Contribution for Vulnerable Debtors (Law 4916/2022), requests (pending) for inclusion under the provisions of Laws 3869/2010 and 4605/2019, and mediation requests for finding solutions with debtors (Law 4640/2019)].

### **C. For the protection of legitimate interests**

Cepal processes personal data for the purposes of the legitimate interests pursued by Cepal or by third parties. Such processing takes place after the balancing of Cepal's interests and the interests or fundamental rights and freedoms of the data subjects which require protection of personal data.

Such data processing includes, indicatively the following:

- The management of debts entrusted to Cepal and the fulfillment of its related obligations arising from contracts with its Clients in the context of managing their claims against debtors.
- For the management of debtor complaints or the processing of requests.
- The pursuit of lawful claims and the preparation of Cepal's defense in legal disputes before competent judicial authorities or in proceedings before other bodies of out-of-court/alternative dispute resolution.
- 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 access controls and protective measures against violations.
- The installation of monitoring systems (closed-circuit cameras - CCTV), e.g. at the entrance of our facilities, for the safety and security of persons and assets, for the prevention of criminal acts.
- Procedures for the management of Cepal's activities and for the further development of Cepal's products and services.
- Notification/exchange of personal data within Cepal for the purposes of updating/verifying one's personal data in accordance with the relevant compliance framework.





- Within the framework of communication with debtors or clients through channels such as SMS, Viber, or email, for the purpose of informing them, for example, about their debts, proposals for debt settlement, as well as the status of requests or complaints submitted to the Company.
- Risk Management by Cepal.
- Improving the functionality of Cepal's website and the navigation experience of visitors to the Cepal's website, as well as network and data security.

#### **D. Upon consent**

In the event that the processing of your personal data is not based on any of the above lawful grounds, Cepal will process your personal data only if you have previously provided your explicit 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.

## **6. Personal Data Recipients**

During the performance of its legal/regulatory obligations, Cepal may forward the personal data to authorized employees of Cepal with respect to their tasks, to service providers (processors), who are contractually bound to the Company in order to ensure the obligation of confidentiality, as well as all obligations provided under national and EU legislation on the protection of personal data, to tax and supervisory authorities or to any person or entity, defined by legal or regulatory provisions.

All employees are obliged to observe the confidentiality principles and the provisions of the GDPR and the relevant national legislation.

Service providers contractually undertake confidentiality obligations and the obligation to comply with the personal data protection legislation.

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

- Beneficiaries of the debts / Credit purchasers
- Credit and loan servicing companies under Law 5072/2023, as in force.
- Affiliated companies within the group to which Cepal belongs.
- Teiresias S.A.
- Debt collection companies under Law 3758/2009, as in force.
- Collaborating Law firms and/or legal counsels, court bailiffs, notaries, engineers, appraisers, auditors, and accountants.
- Debt collection Organizations.
- Financial and Business Consultants.



- Companies processing/clearing payments with cards.
- Insurance companies and insurance intermediaries.
- The Bank of Greece, other national central banks of the Eurosystem, and the European Central Bank, or other supervisory or auditing authorities within the scope of their lawful competences.
- Databases of the General Secretariat for the Financial Sector & Private Debt Management of the Ministry of National Economy and Finance or any other competent authority, including via connection with the Platform for the Protection of Primary Residence and the Platform of the Out-of-Court Debt Settlement Mechanism, in accordance with the applicable legislative framework.
- Judicial authorities and public bodies, as well as supervisory authorities at national and European level, within the scope of exercising their competences.
- “Interbanking Systems S.A.” (“DIAS S.A.”) for the facilitation of interbank transactions.
- Third party service providers appointed by Cepal or the beneficiary of the debts for specific services, such as data storage service providers, physical and electronic file storage service providers, archiving, management and destruction of files and data, service providers services of all kinds of information and electronic systems and network (such as cloud), website development and support companies, providers of printing and sending of the periodic statements and written communications, call center providers , electronic money institutions and payment service providers, companies conducting customer satisfaction surveys.
- Companies for the provision of consulting and coordination services for the acquisition or management of debts, in the frame of a contractual relationship either with the Beneficiaries of the debts or with Cepal Hellas, to the extend necessary for the purposes of management or transfer of the debts
- Real estate management or investment companies.
- Affiliated companies within the group where Cepal belongs.
- Postal service providers.
- Security and physical protection companies.

For 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 or public authorities or the Anti-Money Laundering Authority (Greek Financial Intelligence Unit).

## 7. Sharing personal data outside the EEA

Cepal does not transfer personal data to any third countries outside the European Economic Area and international organizations. However, in exceptional cases, Cepal may transfer personal data outside the EEA provided such transfer is required by the applicable regulatory



or legislative framework or Cepal deems it as necessary for the performance of its contractual obligations, such as via processors who may use. In this case Cepal ensures that there is an appropriate level of protection corresponding to the level of protection of personal data in the EEA and that the transfer in question is lawful on condition that there is an adequacy decision of the European Commission or the required guarantees of Articles 44-50 of the GDPR are provided, such as the European Commission's Binding Corporate Rules or Standard Contractual Clauses.

## 8. Automated decision-making, profiling

Cepal Hellas, in the context of its activities for managing and monitoring claims arising from loans and credits, may engage in profiling, as defined in Article 4(4) of the GDPR.

Profiling is carried out during communications between the Company's responsible employees and debtors, for the purpose of:

- Improving the quality and effectiveness of telephone calls;
- Tailoring communication to the needs, preferences, and characteristics of each debtor;
- Better, more effective, and consistent management of claims by Cepal Hellas;
- Assessing the risks of delay or default and properly categorizing obligations;
- Supporting internal business decisions regarding case handling.

Processing is limited to data that is necessary, relevant, and adequate for the above purposes and is based on an appropriate legal basis (protection of the legitimate interest of Cepal Hellas).

For the same purposes, the Company may also use systems that assist in decision-making through automated means. However, through such systems:

- No decisions are made that produce legal effects or significantly affect data subjects solely through automated processing;
- Any significant or critical decision is subject to human supervision and review;
- Data subjects have the right to request human intervention, express their views, and challenge decisions based on automated processing.

Furthermore, the processing of personal data and limited profiling (always with human intervention) may also be carried out for the purpose of informing debtors about products and proposals for settling their debts.

Data subjects have the right to object at any time to the processing of personal data for the purposes described above by contacting Cepal in writing at the email address: [dpo@cepal.gr](mailto:dpo@cepal.gr).



## 9. Retention of personal data

The personal data processed by Cepal are retained for the duration of the transactional or other relationship with the data subject and for as long as necessary for the purpose for which they were collected, and at most until the expiration of the statutory limitation period for claims, that is, up to twenty (20) years from the termination of the transactional relationship with the data subject by any means.

When processing is required as an obligation under the applicable legal/regulatory framework (such as tax legislation, Bank of Greece Regulations/Acts) or when a specific retention period is provided, your personal data will be stored for the duration required by the relevant provisions.

More specifically, personal data is retained for as long as a transactional or other 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- Bank of Greece rule.
- Ten (10) years for tax records.

With regards to any recorded telephone communication for the purposes of informing the debtors for overdue debts, the retention period is one (1) year after the date of each communication according to article 8 par. 2 Law 3758/2009, as in force.

In the event of a legal dispute with the Company and/or the respective claims holder, the retention period of personal data will be extended until the issuance of a final and binding court decision. After the expiration of the retention period, Cepal proceeds with the secure destruction and deletion of personal data.

Finally, regarding personal data recorded in the visitor logbook of Cepal Hellas upon entry to the Company's premises, such data are retained for 3 months from the date of collection, while personal data related to Wi-Fi access are retained for 8 days from the date of connection.

All employees of Cepal responsible for the collection, storage or personal data processing must regularly consider the necessity of data for the performance of the business purpose for which it was originally collected, according to Cepal's Data Retention Policy.

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



## 10. Personal Data Security

Cepal applies all appropriate technical measures, such as anonymization, pseudonymization, data encryption, use of network security systems (Firewalls/ IPS/ IDS/ Antimalware/ etc.), DLP, vulnerability assessment, penetration testing, etc, and organizational safeguards, such as information security management system, information security policies and procedures, privacy by design and by default procedures, confidentiality agreements with employees, training of personnel concerning matters of information security, periodic review and control of the information security management system based on international standards (e.g. ISO 27001, ISO 22301, ISO 27701, etc.), regulations (e.g. GDPR) and information security best practices.

Each employee that has access to the personal data must use it exclusively to serve the abovementioned purposes.

Cepal's employees are obliged to comply with the policies and procedures relating to personal data protection and to observe the safeguards.

## 11. Data Subjects' Rights

The applicable legislation on personal data protection legislation grants to the data subjects the following rights, which are fulfilled in accordance with the conditions set by the GDPR:

- **Right of Access:** The data subject is entitled to be informed of whether and to what extent are being processed, such as what personal data Cepal has collected and processes, their origin, purpose and legal basis of processing, any recipients or categories or 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, in order to render such information accurate. The data subject files the relevant request to Cepal with the accurate personal data.
- **Right to Erasure:** The data subject is entitled to request the deletion of its personal data from Cepal's records if their processing is not necessary to pursue the purposes for which the data was collected and there is no legal reason for such a data retention.
- **Right to Restriction of Processing.** The data subject is entitled to request the restriction of its personal data processing when, for example, it is inaccurate, or the purpose of its processing has been fulfilled and provided there is no legitimate reason for its retention. Processing may be restricted until any inaccuracy is corrected.



- **Right to Data Portability.** The data subject is entitled to request a copy of its personal data . in a structured, commonly used and machine-readable format in order to transmit that data to another organizations.

-**Right not to subject to automated individual decision-making, including profiling:** The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

- **Right to Withdraw Consent.** The data subject is entitled to withdraw at any time the consent (without retrospective force) it has granted to Cepal in case the personal data processing is based on the consent. Withdrawal of the consent does not impair the lawfulness of the processing which was based on the consent, before it is withdrawn.

- **Right to object :** At any time, the data subject is entitled to object to the processing of its personal data carried out in the pursuit of Cepal's legitimate interests, unless it demonstrates that there are overriding compelling and legitimate reasons for such a processing.

Data subjects may exercise the abovementioned rights by sending their request via the following email: [dpo@cepal.gr](mailto:dpo@cepal.gr) or by post at the following address: Attention to Data Protection Officer, Cepal Hellas 348 Andrea Syngrou Avenue, Kallithea, P.O. 17674, Attica, Greece. The data subjects may file the Data Subjects' Requests Request Form, which is available on Cepal's website, in order to submit their request.

Data subjects' requests are answered within 30 days from their receipt except for exceptional cases, where the above-mentioned period may be extended for two (2) more months, if necessary, considering the complexity of the request and/or the number of requests. In this case, Cepal will inform the data subjects about any extension within the month of the delivery of the request, as well as about the reasons for such delay.

## 12. Contact Details

For any further information or request related to the Data Protection Policy and to exercise of the abovementioned rights, the data subjects may contact the Data Protection Officer (DPO) of Cepal via the following email: [dpo@cepal.gr](mailto:dpo@cepal.gr) or by post to the following address: Attention to Data Protection Officer, Cepal Hellas 348 Andrea Syngrou Avenue, Kallithea, P.O. 176 74,- Attica, Greece.