

Our Privacy Notice

This privacy notice explains how and why we collect and process your personal data as well as your data protection rights (the **Privacy Notice**). We are committed to processing any personal data in a lawful, fair, and transparent manner in accordance with applicable rules on the protection of personal data, including the General Data Protection Regulation (Regulation (EU) 2016/679) (the **GDPR**) and Greek Law 4624/2019, as in force.

1. Who are we?

We are **Hoist Finance AB (publ) (HFAB or we/us/our)** a publicly listed company based in Sweden and the parent company of the Hoist Finance Group. HFAB acts as the controller of your personal data in its capacity as legal and beneficial owner of portfolios of receivables in accordance with the provisions of Law 4354/2015 and/or 5072/2023 (each as applicable and as in force). All matters and data processing activities related to debt collection, debt administration and exercising the rights of the lender in relation to your debt(s) are handled by “Cepal Hellas Financial Services Single Member Société Anonyme - Servicing of Receivables from Loans and Credits” (**Cepal or Servicer**), which has been appointed by HFAB as servicer of the relevant loan portfolios in accordance with applicable laws. HFAB and Cepal act as joint controllers in respect of certain processing activities of your personal data (e.g., for debt settlement purposes)

2. What personal data do we hold, why do we process it, and on what legal bases?

This Privacy Notice concerns borrowers/debtors, co-borrowers/co-debtors, guarantors, third parties providing real estate or other collateral security, as well as process agents, legal proxies, and authorized representatives of the parties listed above (collectively **you**).

We process the following categories of personal data:

- **Identification, demographic and contact data**, such as your full name, Tax Identification Number (TIN), ID number, date of birth, home address
- **Contract, financial and debt(s)-related data**, such as credit files, contract number and contract data, outstanding amount(s), payment history
- **Real estate and collateral data**: such as property data and encumbrances,
- **Complaints or inquiries data** (when you communicate with us), such as email correspondence and letters
- **Legal actions and judicial/litigation data**, such as legal status of claims, enforcement status
- **Special categories data** (where voluntarily provided by you to the Servicer): the Servicer may inform us that you have voluntarily provided information regarding your vulnerability status (e.g., health or disability data) in supporting documentation. In such cases, we do not have access to the underlying data or documentation, we will only be informed that you have raised health-related issues and will process this information to the extent necessary for our assessment.

Purposes for processing	Legal bases
Acquisition of receivables and completion of necessary legal actions and registrations	Our legitimate interests to acquire the portfolio (Article 6(1)(f) GDPR) and compliance with our legal obligations (Article 6(1)(c) GDPR) in relation to the completion of the necessary legal actions and registrations
Assignment of receivables management to the Servicer	Compliance with our legal obligations (Article 6(1)(c) GDPR) in relation to the mandatory assignment of the credit servicing and administration to a licensed Servicer under applicable laws
Compliance with legal obligations, including accounting/tax obligations, anti-money laundering (AML), etc.	Compliance with our legal obligations (Article 6(1)(c) GDPR)

Establishing, exercising, or defending legal claims	Legitimate interests of HFAB or third parties, including Hoist Finance Group of companies (Article 6(1)(f) GDPR)
Responding to your complaints or inquiries	Legitimate interests of HFAB or third parties, including Hoist Finance Group of companies (Article 6(1)(f) GDPR)
Supervision and monitoring of the servicing operations executed by the Servicer	Legitimate interests of HFAB or third parties, including Hoist Finance Group of companies (Article 6(1)(f) GDPR)

3. Where do we get the personal data from?

We initially receive your personal data from the previous owner of the claim (lender) as part of its sale. We have acquired portfolios from ALPHA BANK (in the cases of the portfolios Mercury, Orbit, Light and Cell) and from the designated activity companies COSMOS SECURITISATION DESIGNATED ACTIVITY COMPANY, GALAXY II FUNDING DESIGNATED ACTIVITY COMPANY and ORION X SECURITISATION DESIGNATED ACTIVITY COMPANY (in the case of the Pearl portfolio). We also obtain data from the Servicer, our legal service providers or you when you communicate directly with us.

4. Who do we share your personal data with?

We do not disclose your personal data except in the following limited circumstances:

- We may share your personal data within the Hoist Finance Group, to which we belong, such as with Hoist Consulting in its capacity as a provider of consulting and coordination services appointed by us or the Group company that takes care of our IT infrastructure.
- We may also share your personal data with the following recipients, which are carefully vetted and must comply with our strict contractual security and privacy requirements and follow our guidelines:
 - (a) The Servicer, Cepal, responsible for debt management services, as described above,
 - (b) The digital archiving services provider,
 - (c) Our legal advisors, to the extent necessary.
- Finally, we may also disclose your personal data to third parties:
 - (a) In the event we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
 - (b) If we are under a duty to share your personal data to comply with any legal obligation or to enforce or apply our terms of use or to protect our rights, property or safety. This includes completing mandatory legal filings and registrations with competent public, land, and pledge registries, exchanging personal data with authorities for the purposes of tax reporting or anti-money laundering, or as a response to their requests, where required by applicable legislation.

5. Do we transfer your personal data outside of the EU/EEA?

Your personal data will generally be kept within the EU/EEA or in countries deemed by the European Commission to have an adequate level of protection. Your data may be transferred to third countries, for a specific purpose and for limited time. This is particularly the case where continuous technical support (24 hours a day, 7 days a week) is needed to maintain our IT infrastructure, and where the support teams of our service providers are located outside the EU/EEA. In all cases, however, we have technical, organisational, and contractual protections in place to keep the data safe and to ensure an adequate level of protection. Contractually, transfers outside the EU/EEA to countries without an adequacy decision by the European Commission will be based on standard data protection clauses adopted by the European Commission, a copy of which you can obtain upon request by contacting us.

6. How do we protect your personal data?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal data on our specific instructions, and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable authority where we are legally required to do so.

7. How long do we keep your personal data?

We will retain your 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 lifecycle of the claims:** the duration of the contractual relationship from which the debt(s) arise(s), or until the full and final settlement, repayment, or termination of the transferred credit claims.
- **Compliance with legal and regulatory obligations:** Whether there is a statutory obligation to which we are subject as a controller, requiring us to retain information in accordance with the laws of Sweden and/or Greece (such as anti-money laundering legislation, tax and accounting frameworks, or mandatory reporting rules of the Bank of Greece).
- **Our legal position and defense:** Whether retention is required to establish, exercise, or defend legal claims, taking into strict account the applicable statutory limitation periods under applicable laws, as well as the existence of actual or potential litigation, disputes, complaints, or regulatory investigations. In the event of ongoing judicial proceedings or legal disputes, your personal data will be retained until the issuance of an irrevocable court decision.

8. What are your statutory data protection rights?

Right to access: You have the right to request a copy of the personal data that we hold about you. If you would like a copy of some or all your personal data, please contact us. We will respond to your request within one month of receiving your request or as otherwise provided in the applicable legislation.

Right to rectification: We want to make sure that your personal data is accurate and up to date. You may ask us to correct or complete information you think is inaccurate or incomplete. We may ask that you provide reasonable proof to verify your request.

Right to restrict processing: If you believe the personal data we hold is inaccurate, unlawful, or that we do not have a legitimate interest to process it, you can request that we restrict any processing until this is rectified.

Right to object to processing: You have the right to object at any time to the processing of your personal data where such processing is based on our legitimate interests for reasons related to your particular situation.

Right to data portability: This right allows you to obtain in a structured, commonly used format, and to reuse the personal data you have provided to us for your own purpose and have it transmitted directly to different services. This applies only to personal data we use based on your consent or on a contractual basis.

Rights related to automated decision making and profiling: At the moment, no automated individual decision making or profiling is conducted vis-à-vis your personal data.

Right to erasure ("right to be forgotten"): You may ask us to delete the personal data we hold about you where it is no longer necessary for the purpose for which it was collected; where you withdraw any consent you provided for its processing; where you object to our processing of it (see above); or where our processing is unlawful. Please note, however, that we are also subject to certain legal obligations that prevent us from immediately deleting all your data. For example, we are legally obliged to keep certain data for anti-money laundering purposes for at least five years. However, any data we are prohibited from deleting will be blocked and, when we are no longer obliged to keep it, erased.

Right to withdraw consent: Where our processing is based on your consent, you have the right to withdraw it at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal.

Right to lodge a complaint: You have the right to lodge a complaint with a supervisory authority, in particular in the EU country of your habitual residence, place of work or of an alleged infringement of the GDPR. In Greece, the competent data protection supervisory authority is the Hellenic Data Protection Authority (www.dpa.gr).

You may exercise your rights by sending an email at dpo@hoistfinance.com.

9. How can you contact us?

Please contact us if you have any questions about our Privacy Notice or the processing of your personal data:

Address: Hoist Finance AB (publ)

Att: Head of Data Protection

P.O. Box 7848

SE-111 21 Stockholm

Sweden

E-mail: dpo@hoistfinance.com

Last update of the Privacy Notice: September 2026.