

## Privacy Notice

This Privacy Notice is a guide to the use of the personal information we have about you and describes the information that Hoist Hellas collects and/or otherwise processes about you; how we use and protect this information; the choices you can make about how we use this information.

### Who are we and what do we do?

Hoist Hellas is a credit servicing firm authorized by the Bank of Greece in accordance with article 1 par. 1(a) of law 4354/2015, as in force, and the Bank of Greece Executive Committee Act 118/2017 and specializes in the management of performing and non-performing loans originated by credit institutions. Hoist Hellas is a subsidiary of Hoist Finance AB (publ) ("**Hoist Finance**"), a Swedish financial institution with strong presence in 13 European countries.

Hoist Finance has acquired from Alpha Bank two portfolios of non-performing retail loans (the "**Mercury Portfolio**", the "**Orbit Portfolio**" and the "**Light Portfolio**") in accordance with the provisions of law 4354/2015 (as in force) and Hoist Finance has appointed Cepal Hellas Financial Services S.A. ("**Cepal**") as servicer of Mercury Portfolio, Orbit Portfolio and Light Portfolio in accordance with the provisions of law 4354/2015 (as in force).

Hoist Hellas has not yet been assigned with the servicing of any bank loan and credit receivables, whether acquired by Hoist Finance or any other party. Hoist Hellas has been appointed by Hoist Finance to only provide coordination services to Hoist Finance in connection with Mercury Portfolio, Orbit Portfolio and Light Portfolio.

The data controller of your personal data in connection with Mercury Portfolio, Orbit Portfolio or Light Portfolio, is Hoist Finance, while Cepal (as the appointed servicer for Mercury Portfolio, Orbit Portfolio and Light Portfolio) is a joint controller of your personal data in connection with Mercury Portfolio, Orbit Portfolio and Light Portfolio.

Hoist Hellas, in its capacity as servicing coordinator for Mercury Portfolio, Orbit Portfolio and Light Portfolio (and for any other portfolio acquired from time to time by Hoist Finance for which Hoist Hellas will be appointed to provide coordination services), may process your personal data only to the extent necessary for the purposes of the coordination services provided by Hoist Hellas to Hoist Finance.

If at any time in the future Hoist Hellas is appointed by Hoist Finance to service any bank loan and credit receivables (forming part of Mercury Portfolio, of Orbit Portfolio, of Light Portfolio or of any other portfolio acquired by Hoist Finance), and not merely to provide coordination services, then and in such case only and for such receivables only Hoist Hellas, in its capacity as servicer of such receivables, will process your personal data also as joint controller with Hoist Finance and will provide you information on the relevant processing.

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Always in compliance with the Greek legal and regulatory framework, we incorporate in the Greek market the values and many years of experience of Hoist Finance.

As a processor we comply with applicable rules on the protection of personal data, including the General Data Protection Regulation of the European Union 2016/679 ("GDPR") and Greek Law 4624/2019, as in force. In order to serve the above purposes, we process your personal data always taking the appropriate technical and organizational measures, which are necessary for the protection of your personal data, such as by applying internal access rights or encryption.

### **What type of information is collected about you?**

We process your personal data, as data processors, only to the extent necessary in order to provide the coordination services to Hoist Finance.

In order to serve the above purpose, we process the following categories of personal data about you:

- Identification data: such as your tax ID number and, less frequently, your name.
- Details of your debt, such as the contract number and its amendments, the amount outstanding (principal, interest and other charges) and (if applicable) any security interests for your debt.
- Information about you included in complaints made by you to the Servicer, such as contact data and debt data.
- Information (where applicable) of Law 3869/2010 or out-of-court workout proceedings with respect to court, enforcement or insolvency proceedings related to your debt (including hearing dates, court decisions, court costs and other costs as well as debt to third party creditors).
- Information about your immovable property that relates to the Portfolio.
- Credit files, such as physical or electronic files that contain originals (or true copies of originals) of documentation relevant to each receivable.

### **Where do we get the information from?**

We receive your personal data from Hoist Finance. Hoist Finance has received your personal data, which were lawfully collected from the bank that your debt originated from/was acquired from.

Then we get information from:

- Credit servicing firms of paragraph (a) of article 1 of Law 4354/2015, including Cepal or any other servicing firm that may from time to time be appointed to service bank loan and credit receivables.
- Archiving facilities provider(s), which is appointed by Hoist Finance for the provision of archiving facilities in connection with the Portfolio.

## How do we use (process) the information?

We process your personal data for the coordination of the servicing of the receivables that are included in Mercury Portfolio, in Orbit Portfolio and in Light Portfolio (and any other portfolio acquired by Hoist Finance), which has been assigned to the servicer appointed by Hoist Finance (namely Cepal for Mercury Portfolio, for Orbit Portfolio and for Light Portfolio), for supporting Hoist Finance in the monitoring and assessment of the performance of the appointed servicer and for making recommendations in respect of applied strategies or procedures.

## Legal basis for processing

The legal basis for the processing of this information is the loan or other credit agreement giving rise to your debts and our legal interest for our performance of the agreements by which we have been appointed by Hoist Finance to provide coordination services in connection with Mercury Portfolio, Orbit Portfolio and Light Portfolio respectively (and any other agreement appointing us to provide coordination services in connection with any other portfolio acquired by Hoist Finance) (article 6 par. 1(f) GDPR).

## How long do we store your information?

We retain your information only for as long as it has been agreed with Hoist Finance and in accordance with the applicable legislation.

Type of information	Reason for processing	Legal bases for our processing of your information.	How long do we hold your information for.
<b>Identification data:</b> such as tax ID number and, less frequently, your name. <b>Details of your debt,</b> such as the contract number and its amendments, the amount outstanding (principal, interest and other charges) and (if applicable) any security interests for your debt. <b>Information (where applicable) of Law 3869/2010 or out-of-court workout proceedings</b> with respect to court, enforcement or insolvency proceedings related to your debt (including hearing dates, court decisions, court costs and other costs as well as debt to third party creditors). <b>Information about you included in complaints made by you to the Servicer,</b> such as contact data and debt data. <b>Information about your immovable property related to the Portfolio.</b> <b>Credit files,</b> such as physical or electronic files that contain originals (or true copies of originals) of documentation relevant to each receivable.	We need this information for the coordination of the management of your debts	The legal basis for the processing of this information is the agreement under which your debt was raised and our legal interests for the performance of the agreement under which we undertook the servicing coordination of the portfolio on behalf of Hoist Finance (article 6 par. 1(f) GDPR).	5 years from the end of the contractual relationship with Hoist Finance.

## **Disclosure of your information**

Within the context of our activities, we rely on third-party service providers to perform a variety of business operations on our behalf. In so doing, we may need to share your information with them. We provide our service providers with only the personal information they need to perform the services we request, and we require that they protect this information, strictly adhere to Greek and EU legislation on the management of this information and not use it for any other purpose.

On that basis we do not disclose your information except in the following limited circumstances:

We may share your personal information within the Hoist Finance group of companies, to which we belong. For example, our IT infrastructure is managed at group level. This helps to keep our systems operational and secure. Any sharing is subject to security and privacy requirements.

We may also share your personal data carefully with third parties/vendors, who must comply with our strict security and privacy requirements and follow our guidelines, in order to assist us in the servicing coordination of the Portfolio for example consulting service providers???)

Finally, we may also disclose your personal information to third parties if we are under a duty or obligation to disclose or share your personal data to comply with any legal obligation or in order to enforce or apply our terms of use or to protect our rights, property or safety. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction, with authorities for the purposes of tax reporting or anti-money laundering. This also includes responses to public prosecutors and authorities' requests.

## **Safeguards taken to protect your information**

In order to serve the above purposes, we process your personal data always taking the appropriate technical and organizational measures, which are necessary for the protection of your personal data, such as by applying internal access rights or encryption. To help protect the privacy of your information, we maintain physical, technical and administrative safeguards. We also update and test our security technology on an ongoing basis.

## **Transfer of information outside the EU/European Economic Area (EEA)**

Within the context of our activities, information we collect about you might be transferred or processed outside the EEA. For this purpose, however, we will take all reasonable steps to ensure that your information is held in compliance with the applicable data protection legislation. Such transfers take place only if the specific requirements, as set forth in Articles 44 et seq. of the GDPR, are fulfilled in order to ensure an adequate level of protection is guaranteed for such international data transfers in each case.

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In all cases, however, we have technical, organizational, and contractual protections in place to keep the information 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 may be obtained by contacting us. For transfers to the USA and other third country transfers we rely solely on standard contractual clauses, SCC's.

### **Your rights:**

**Right to access:** You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please contact us. We will respond to your request within one month.

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

**Right to restrict processing:** If you believe the personal information we hold is inaccurate, unlawful, no longer needed 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:** Where your particular situation merits that we no longer process your information for the performance of a task carried out in the public interest or based on our legitimate interest, you have the right to object to the processing.

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

**Rights related to automated decision making and profiling:** You have the right to safeguards against the risk of potentially damaging decisions being taken without human intervention. This right applies where a decision is based solely on automated processing and produces a legal effect or similar significant effect. If this is the case we must ensure you are able to obtain human intervention, to express your point of view, and to have the opportunity to challenge it. We will also explain the logic behind the decision.

Profiling is defined as any form of automated processing intended to evaluate certain personal aspects of an individual in order to analyze or predict aspects of their personal circumstances, behaviors or abilities. Processing must be fair and transparent, use appropriate mathematical or statistical procedures, use appropriate controls to minimize inaccuracies and secure personal data.

We do not use any automated individual decision making.

**Right to erasure (“right to be forgotten”):** You may ask us to delete the information we hold on 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); where our processing is unlawful or for compliance with a legal obligation. Please note, however, that we are also subject to certain legal obligations that prevent us from immediately deleting all of your information. However, any data we are prohibited from deleting will be blocked and, when we are no longer obliged to keep it, erased.

**Right to lodge a complaint:** You have the right to lodge a complaint with the competent Greek supervisory authority, which is the Hellenic Data Protection Authority, 1-3 Kifissias avenue, 115 23, Athens. You may find information on how to lodge a complaint in the supervisory authority's website (<http://www.dpa.gr/>).

## **Cookies**

We use cookies (small text files placed on your device) to support our website, provide our online services and to help collect information. Cookies allow us, among others, to store your preferences and settings, to provide interest-based advertising, and analyze how our websites and online services are performing.

To learn more about cookies used on this site and how to apply your preferences, please follow this link <https://www.hoistfinance.gr/en/meet-hoist/cookie-policy/>.

## **Version information – Changes and Updates**

This privacy policy was last updated on April 2022

We reserve the right to amend this Privacy Notice at any time, for any reason, without further providing you notification, other than the posting of the amended Privacy Notice at our website. We may e-mail periodic reminders of changes to and updates of this Privacy Notice, but you should check our website frequently to see the current Privacy Notice that is in effect.

HOIST HELLAS SINGLE MEMBER S.L.D.S.A.

### **How to contact us**

Please contact us if you have any questions about our privacy policy or information, we hold about you or the basis upon which we process such information:

Hoist Hellas Single Member Servicing of Loans and Debts Societe Anonyme,  
Astronafton Street 1,  
Maroussi Attiki, 15125  
[privacygreece@hoistfinance.com](mailto:privacygreece@hoistfinance.com)

You may also contact the Group's Data Protection Officer directly:

Hoist Finance AB (publ), Group Data Protection Officer  
P.O. Box 7848  
SE-103 99 Stockholm  
Sweden  
[dpo@hoistfinance.com](mailto:dpo@hoistfinance.com)