

PRIVACY NOTICE

VERALTIS ASSET MANAGEMENT S.A.<sup>1</sup> (ex B2Kapital<sup>2</sup>) jointly<sup>3</sup> with HELLAS 2P<sup>4</sup> (hereinafter “the Company”) is the Controller of your personal data in the context of the management of your debt, in accordance with the following.

**Categories of personal data:** Identification data, contact data, employment data, your family and financial situation, including your income and creditworthiness, your debt payment history and data collected for the purposes of the Bank of Greece’s Code of Conduct. Our Company does not collect sensitive data, except where it is directly provided by you and required by the applicable legislation.

**Sources:** The Company processes data collected by financial institutions, claims management companies that may have managed your claim, and from public sources in accordance with the applicable legislation, as well as data that you directly disclose to the Company and its partners during the claims management period.

**Processing purposes:**

Types of Personal Data	Legal Basis	Processing Purpose
<b>Contact and identification data:</b> Name, Address, Email, Telephone, Date of Birth, Citizenship, Family Status, Social Security Data, Bank Account, Credit Card Details, Tax Registration Number, AMKA, ID  <b>Financial data:</b> Income, Estate, Investments, Expenditure report, Loans, Mortgages, Credits, Inheritance, Insurance Compensation  <b>Employment data:</b> Benefits, Work privileges, Grants, Retirement pension, Employment History, Employment regime	Processing necessary for the performance of a contract	i) any communication regarding your Debt; ii) arrangement and collection of a Debt iii) servicing debtors in relation to requests or complaints
<b>Contact and identification data:</b> Name, Address, Email, Telephone, Date of Birth, Citizenship, Family Status, Social Security Data, Bank Account, Credit Card Details, Tax Registration Number, AMKA, ID Call recording	Compliance with a legal obligation to which the Company is subject	i) checks for the detection, prevention and combating of money laundering, financing of terrorism and fraud (dictated by Greek Law Nr. 4557/2018) ii) recording of phone calls with debtors (dictated, inter alia, by Greek Law Nr. 3758/2009)

<sup>1</sup> Limited Company for the Management of Loan and Credit Claims under Article 1 par. 1(a) of Law Nr. 4354/2015 under the name: “VERALTIS ASSET MANAGEMENT SINGLE MEMBER SOCIÉTÉ ANONYME CLAIMS MANAGEMENT FROM LOANS AND CREDITS” having its registered office at 1-3 Kifisias Av., Athens, 11523, Greece, email: [info@veraltis.gr](mailto:info@veraltis.gr), tel: +302162005000.

<sup>2</sup> Limited Company for the Management of Loan and Credit Claims under Article 1 par. 1(a) of Law Nr. 4354/2015 under the name: “B2 KAPITAL SINGLE MEMBER SOCIÉTÉ ANONYME CLAIMS MANAGEMENT FROM LOANS AND CREDITS”.

<sup>3</sup> Under the Joint Data Controller Agreement concluded on 01 December 2020 between B2Kapital S.A and Hellas 2P.

<sup>4</sup> HELLAS 2P INVESTMENT DESIGNATED ACTIVITY COMPANY, (hereinafter referred to as “Hellas 2p”) a special purpose company established in Ireland, 32 Molesworth Street, Dublin 2, registered with the Companies Registry of Ireland under registration number 635695.

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<p><b>Financial data:</b>  <b>Income, Estate, Investments, Expenditure report, Loans, Mortgages, Credits, Inheritance, Insurance Compensation</b></p>		<p><b>iii)</b> compliance with the Company's regulatory obligations (the management of requests from the Bank of Greece and other public authorities, as well as the sending of reports to the latter, dictated by Greek Law 4354/2015 and Bank of Greece's Executive Committee Act 118/19.5.2017)</p> <p><b>iv)</b> the identification of natural persons submitting requests or complaints (dictated by the GDPR and Consumer Protection legislation);</p> <p><b>v)</b> the transmission of financial behaviour data files to Tiresias SA (dictated by Greek Law Nr. 3816/2010 and Decision No 64/2007 of the Hellenic Personal Data Protection Authority)</p>
<p><b>Contact and identification data:</b>  <b>Name, Address, Email, Telephone, Date of Birth, Citizenship, Family Status, Marital life, Social Security Data, Bank Account, Credit Card Details, Tax Registration Number, AMKA, ID</b></p> <p><b>Financial profile details:</b>  <b>Income, Estate, Investments, Expenditure report, Loans, Mortgages, Credits, Inheritance, Insurance Compensation</b></p> <p><b>Employment data:</b>  <b>Benefits, Work privileges, Grants, Retirement pension, Employment History, Employment regime</b></p> <p><b>Legal/Court Decisions and/or Certificate of Imprisonment</b></p>	<p>Processing necessary for the purposes of the legitimate interests</p>	<p><b>i)</b> the representation of Hellas 2P before the Courts</p> <p><b>ii)</b> statistical analysis for the evaluation and improvement of the debt collection methodology,</p> <p><b>iii)</b> access by the Company to the databases of Tiresias S.A. for the assessment of your solvency</p> <p><b>iv)</b> the assessment of payment behaviour and the accordingly appropriate debt collection measures.</p>

Please note that if you do not provide personal data which is required for compliance with a legal obligation to which the Company is subject or for the performance of the Company's contract with you, the Company may not be able to provide services to you.

**Automated decision making & profiling**

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The Company does not make decisions based solely on automated decision making. The Company may, however, make decisions by applying partially automated methods and procedures, including the preparation of a) credit profiling and segmentation of debtors, based on your financial data, as well as your creditworthiness data, when this is necessary for the conclusion or performance of a contract, and/or when this is permitted by the relevant European or national legal framework to which the Company is subject, b) a profile for assessing the risk of money laundering and terrorist financing, using internationally recognized models, for the combined assessment of data, aiming at ensuring the Company's compliance with its legal obligations.

**Data disclosure:** To debtors' information companies of Greek Law Nr. 3758/2009, loan and credit management companies of Law Nr. 4354/2015, lawyers and law firms, bailiffs and notaries, third party service providers, such as data storage, archiving, printing, management, updating, sending and destruction of files and data, telephone service companies, providers of information technology products and/or services and/or support of all kinds of information and electronic systems and networks, auditors, providers of accounting/technical and consulting services, to the Bank of Greece or other competent authorities or where required by law or by order of a competent court or authority, to B2Holding Group companies for internal administrative purposes. The Company may collect, process and transmit your personal data to Tiresias S.A. for the purposes of maintaining the Default System (Σ.Α.Υ) database and the Allowance Collection System (Σ.Σ.Χ).

**International data transfers:** The Company and/or its partners do not transfer your data outside the EEA, thus no international data transfer takes place.

**Retention period:** Your personal data will be retained for the duration of your transactional relationship with the Company and for five (5) years after its completion, unless legal and regulatory provisions dictate a longer retention period, or the retention is necessary for the exercise of the Company's legal claims.

**Your rights:** To exercise your right of access, rectification, erasure, restriction of processing, right to object, or right to portability, you can contact the Company's Data Protection Officer at: [dpo@veraltis.gr](mailto:dpo@veraltis.gr). You also have the right to lodge a complaint to the Data Protection Authority through a [dedicated web portal](#) (Athens, 1-3 Kifissia Avenue, P.C. 115 23, Athens, Greece | tel: +30 210 6475600) or the Data Protection Commission (21 Fitzwilliam Square S, Dublin 2, D02 RD28 | tel: + 353 1 7650100). Detailed instructions for filing a complaint are provided on the [Authority's website and at the Data Protection Commission's website](#). For more information, please visit [www.b2kapital.gr](http://www.b2kapital.gr).

**Notice:** This information concerns the personal data of all natural persons connected to the claims managed by the Company in any capacity (indicatively: Borrowers, guarantors, third party collateral providers, special or universal successors of the above, partners of legal entities or legal representatives thereof, shareholders and beneficial owners of legal persons or entities, proxies, agents, employees/associates, family members, lawyers or counterparties of the above, notaries, bailiffs, etc.).