### **Privacy Notice**

The purpose of this privacy notice is to inform you on the manner and the purposes of processing by Hoist Consulting Single Member S.A. ("**Hoist Consulting**") in respect of the personal data that the company collects and processes in any way about you and the rights you have regarding the manner in which we use such information (**Privacy Notice**). Hoist Consulting is committed to processing personal data in a lawful, fair, and transparent way.

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

We are Hoist Consulting, a firm providing consulting and coordinating services for the collection and servicing of receivables/claims and real estate, either to creditors or owners thereof, or to third parties intending to collect receivables and/or real estate in accordance with the applicable legislation and member of the Hoist Finance AB (publ) Group of Companies ("Hoist Finance")

Hoist Finance has acquired from Alpha Bank portfolios of non-performing retail loans (the 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 these portfolios in accordance with the provisions of law 4354/2015 (as in force).

Hoist Consulting has been appointed by Hoist Finance to provide consulting and coordination services to Hoist Finance in connection with these portfolios.

The Data Controller of your personal data in connection with these portfolios is Hoist Finance. While Cepal as the appointed servicer for these portfolios is a Joint Controller of your personal data in connection with our debt collection services. For more information about how Cepal processes your personal data, see Privacy notice on their website.

Hoist Consulting, in its capacity as a provider of consulting and coordination services for Hoist Finance may process your personal data only to the extent necessary for the purposes of consulting and coordination services and in this context Hoist Consulting shall act as the Processor on behalf of Hoist Finance.

As a Processor Hoist Consulting complies 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, Hoist Consulting processes 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.

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

Hoist Consulting processes your personal data for the coordination of the servicing of the receivables that are included in above mentioned portfolios and any other future portfolio acquired by Hoist Finance, which has been assigned to the servicer appointed by Hoist Finance 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 consulting and coordination services (article 6 par. 1(f) GDPR).

# How long do we store your information and what type of information is collected about you?

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?
Identification data: such as 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 (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 you included in complaints made by you to the Servicer, such as contact data and debt data. Information about your immovable property related 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.	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 legitimate 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 date the debt is repaid.

### HOIST CONSULTING SINGLE MEMBER S.A. Information classification: Public

#### Disclosure of your personal data

Hoist Consulting does not disclose Customers' data except in the following specific cases where it is deemed absolutely necessary to and in accordance with the requirements of applicable law:

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, Hoist Finance AB (publ). This helps to keep our systems operational and secure, enabling us to provide our services in the best possible way. Any disclosure of personal data/information is subject to security and privacy requirements.

Within the context of our activities, we rely on third-party service providers to perform a variety of business operations on our behalf, such as IT service providers or consulting service providers. 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. Any disclosure of personal data/information is subject to the requirements of protection and security of personal data.

Finally, we may also disclose your personal information to third parties:

- If Hoist Consulting proceeds with the sale or purchase of any business or assets or with a corporate transformation, where Hoist Consulting may disclose your personal data to the relevant buyer or seller or other relevant person,
- If Hoist Consulting is under a duty or obligation to disclose or share your personal data to comply with any legal obligation or to enforce or apply our terms of use or to protect its 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, or as a response to their requests, where required by applicable legislation.

Your personal data will generally be kept within the EU/EEA or in countries where the European Commission has considered that they provide 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 the Hoist Consulting's IT infrastructure and IT services and when the technical support teams of the providers of such services are located outside the European Union.

In all cases, however, Hoist Consulting has ensured technical, organizational as well as contractual protection to keep the data safe and ensure an adequate level of protection. Contractually, transfers outside the EU/EEA or to countries without an adequacy decision by the European Commission are based on standard data protection clauses approved by the European Commission, a copy of which you can obtain by contacting Hoist Consulting.

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#### Your statutory data protection rights

**Right to access:** You have the right to request a copy of the information that Hoist Consulting holds about you. If you would like a copy of some or all of your personal information, please contact us using the contact details stated below. We will respond to your request within one month of receiving your request or as otherwise provided in the applicable legislation.

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

**Right to restrict processing:** If you believe the personal information Hoist Consulting holds is inaccurate, unlawful, or that does not have legitimate interest to process it, you can request that Hoist Consulting restricts any processing until this is rectified.

**Right to object to processing:** Where your particular situation merits that Hoist Consulting no longer processes 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 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 Hoist Consulting uses based on your consent or on a contractual basis.

**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. If this is the case Hoist Consulting must ensure you are able to obtain human intervention and have the opportunity to challenge it.

At the moment Hoist Consulting does not use any such automated individual decision making or profiling as described above.

**Right to erasure ("right to be forgotten"):** You may ask Hoist Consulting to delete the information it holds 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), or where our processing is unlawful. Please note, however, that Hoist Consulting is also subject to certain legal obligations that prevent it from immediately deleting all of your information. However, any data Hoist Consulting is prohibited from deleting will be blocked and, when it is no longer obliged to keep it, erased.

**Right to lodge a complaint:** You have the right to lodge a complaint with the Hellenic Data Protection Authority: www.dpa.gr.

#### **Changes to this Privacy Notice**

This privacy policy was last updated on [...] December 2024

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Hoist Consulting regularly reviews this Privacy Notice. Hoist Consulting will notify you of any substantial updates and any updates that affect you in advance. Minor changes to the notice, such as making it clearer, will be implemented without directly notifying you.

#### How to contact us

Please contact us if you have any questions about this Privacy Notice or information, we keep about you or the legal basis upon which we process such information:

Hoist Consulting Single MemberS.A. 1 Astronafton Street, Maroussi Attiki, 15125 <u>privacygreece@hoistfinance.com</u>

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