

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 data (**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 portfolios of receivables in accordance with the provisions of law 4354/2015 and/or 5072/2023 (each as applicable and as in force) and Hoist Finance has appointed Cepal Hellas Financial Services S.A. (**Cepal**) as servicer of these portfolios in accordance with applicable laws. Hoist Finance acquired these 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 portfolio Pearl).

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 these portfolios.

Hoist Consulting, in its capacity as a provider of consulting and coordination services for Hoist Finance for the portfolios acquired by Hoist Finance from time to time (provided that the coordination services for such portfolios are assigned to Hoist Consulting), 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 (Regulation (EU) 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 controls or encryption.

Where do we obtain your data from?

We receive your personal data from:

- Receivables management companies referred to in paragraph (a) of Article 1 of Law 4354/2015, including Cepal or any other servicing company that may from time to time be appointed to service bank loans and credit receivables related to the portfolios,
- Records storage/archiving service provider(s) appointed by Hoist Finance to provide records storage facilities in relation to the portfolios,
- Hoist Finance, on an exceptional basis, and
- you, the debtors, when you communicate directly with us.

How do we use (process) the data?

Hoist Consulting processes your personal data for the coordination of the servicing of the receivables that are included in the 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.

What are the legal bases for processing?

The legal bases for the processing of this data are determined by Hoist Finance, in its capacity as data controller. These legal bases include the performance of the loan or other credit agreement giving rise to your debt(s) (Article 6(1)(b) GDPR), Hoist Finance's compliance with its legal obligations under applicable legislation (Article 6(1)(c) GDPR), and the legitimate interests pursued by Hoist Finance (Article 6(1)(f) GDPR).

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

We retain your data only for as long as it has been agreed with Hoist Finance.

Type of data	Reason for processing	Legal bases for our processing of your data	Data retention period
Identification data: such as tax ID number and, less frequently, your name.	We need this data for the coordination of the management of your debt(s).	The legal bases for the processing of this data are the performance of the contract from which your debt(s) arise(s) (Article 6(1)(b) GDPR), Hoist Finance's compliance with its legal obligations under applicable legislation (Article 6(1)(c) GDPR), and the legitimate interests pursued by Hoist Finance (Article 6(1)(f) GDPR), such as the establishment, exercise, and defence of legal claims in relation to your debt(s).	For as long as required under our contractual obligations towards Hoist Finance.
Details of your debt(s), your contract and other financial data, 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(s).			
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(s) (including hearing dates, court decisions, court			

costs and other costs, debt(s) to third party creditors as well as application-related third-party data (e.g., application lawyer name). This information may also include contact, demographic and other data, such as address, date of birth, occupation, etc.			
Information about you included in complaints or inquiries made by you to the Servicer or directly to us , such as contact data and debt(s) data.			
Information about your immovable property related to the portfolios and collateral data.			
Credit files , such as physical or electronic files that contain originals (or true copies of originals) of documentation relevant to each receivable.			
Creditworthiness data (and relevant analytical/derived data)			
Legal actions and judicial/litigation data: such as legal status of claims, enforcement status.			
Special situation data (where relevant): health or disability data included in supporting documentation voluntarily provided by debtors and provided by the servicer to the extent strictly necessary for assessment.			
Professional/business data , such as company type and sector (where linked to natural persons).			
Guarantor-related data.			

Disclosure of your personal data

Hoist Consulting does not disclose customers' data except upon the instructions of Hoist Finance and only when this is absolutely necessary and required, specifically in the following cases:

We may share your personal data within the Hoist Finance AB (publ) group of companies, to which we belong. For example, our IT infrastructure is managed at group level, by 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 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 personal data with them. We provide our service providers with only the personal data 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 data and not use it for any other purpose. Any disclosure of personal data is subject to the requirements of protection and security of personal data.

Finally, we may also disclose your personal data 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 upon the approval of Hoist Finance,
- 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 data 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 in accordance with the instructions of Hoist Finance 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 upon request by contacting Hoist Finance.

Your statutory data protection rights

Right to access: You have the right to request a copy of the data that we hold about you. If you would like a copy of some or all of your personal data, please contact Hoist Finance using the contact details stated below. Hoist Finance 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 Hoist Finance to correct or complete data you think is inaccurate or incomplete. Hoist Finance 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 Hoist Finance does not have legitimate interest to process it, you can request that Hoist Finance restricts 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 the legitimate interests of Hoist Finance for reasons related to your particular situation.

Right to data portability: This right allows you to obtain in a structured, commonly used format, and reuse the data you have provided to us for your own purpose and have it transmitted directly to different services. This applies only to data Hoist Finance uses based on the performance of the contract.

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 Hoist Finance to delete the data it holds on you where it is no longer necessary for the purpose for which it was collected, where you object to our processing of it (see above), or where our processing is unlawful. Please note, however, that Hoist Finance is also subject to certain legal obligations that prevent it from immediately deleting all of your data. However, any data Hoist Finance is prohibited from deleting will be blocked and, when it is no longer obliged to keep it, erased.

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

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 in April 2026.

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 the data we keep about you or the legal basis upon which we process such data:

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