

PRIVACY NOTICE

LAST UPDATE: July 2020

The CYPRUS ASSET MANAGEMENT COMPANY LIMITED («KEDIPES»), with registration number HE387704 and registered office at 8 Grigoris Afxentiou Street, 1096 Nicosia, PO Box 244537, 1389 Nicosia, is responsible for your personal data as Data Controller.

KEDIPES is a subsidiary company of the COOPERATIVE ASSET MANAGEMENT COMPANY LTD (SEDIPES), formerly known as the Cyprus Cooperative Bank Ltd ("CCB") and has obtained relevant licenses from the Central Bank of Cyprus for the purpose of carrying on business relating to the management of credit facilities.

In the context of the above, and with a view to serving the Group's lawful and other interests, KEDIPES will process your personal data that was held by the Group and which was lawfully collected from you or from third parties. For the purposes of the General Data Protection Regulation (EU) 2016/679 ("GDPR"), KEDIPES will be the new Data Controller of the personal data of the customers of the Group (hereinafter the "Customers") which is necessary for carrying on business related to the management of credit facilities and/or real estate management

KEDIPES is bound by the applicable Data Protection Legislation to ensure and safeguard your right to protection against the processing of personal data and your right to privacy and to protect the personal data that it holds and which concern you.

This Privacy Notice (the "Privacy Notice") describes the way in which KEDIPES processes your personal data in its capacity as "Data Controller".

The Privacy Notice describes:

- the types of personal data we collect;
- how we collect, transmit, process, use and notify personal data;
- the practices we apply to protect and safeguard your personal data;
- information concerning third parties that receive your data;
- your rights in accordance with local applicable personal data laws and the GDPR.



Definitions:

- **"Data Controller"** means a natural or legal person or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- **"Personal data"** shall mean any information relating to a natural person whose identity can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, social security number, address, account number or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- Your personal data is subject to "processing", which includes any operation which is performed on such personal data such as collection, recording, organization, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment, combination, restriction, erasure or destruction.
- The "Group" includes the Cooperative Asset Management Company Ltd, the Cyprus Asset Management Company Limited and/or its subsidiaries and CCSRE REAL ESTATE COMPANY LTD and/or its subsidiaries.

In the Privacy Notice, your personal data is sometimes referred to as "personal data", "personal information" or "data".

Any references in the Privacy Notice to "KEDIPE", "Company", "we", "us", "our", are references to the CYPRUS ASSET MANAGEMENT COMPANY LIMITED.

The Privacy Notice is addressed to:

- Customers and their representatives;
- Affiliates of Customers (as defined in the Privacy Notice);
- Our service providers, representatives, associates, external partners, business partners or agents,
- The visitors of our website,
- The persons visiting our facilities / service centers.

1. WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA AND HOW YOU CAN CONTACT THEM

KEDIPE, as the Data Controller of your data, is responsible for complying with the General Data Protection Regulation (2016/679), the Law providing for the Protection of Natural Persons with regard to the Processing of Personal Data and for the Free Movement of such Data of 2018 (Law 125(I)/2018) as amended or replaced from time to time, and any other applicable local and/or European legislation or regulation.

You can contact KEDIPE at the following address:

Postal Address:

Cyprus Asset Management Company Ltd,
8, Grigori Afxentiou, 1096 Nicosia
PO Box 24537, 1389 Nicosia
To: Data Protection Officer

E-mail: dpo@kedipes.com.cy

To: Data Protection Officer

2. TYPES OF PERSONAL DATA WE COLLECT

The company may collect and process the following categories of personal data:

A. Customer Data

The Group receives and processes information and data specified in the legislative/regulatory framework for the restructuring or management of credit facilities as well as information relating to real estate management such as:

- Data identifying and confirming your identity (e.g. name, gender, father's name, mother's name, nationality, type and number of identification document (this may include IDs, passports, alien's entry permit, tax identification, etc.), date of birth, place of birth, permanent address of residence, signature, etc.).
- Data identifying and confirming your activities and your financial profile (e.g. occupation, employer's data, employment date, marital status, total income, level of education, relationship with Politically Exposed Persons, data of financially dependent persons such as spouse, etc.)
- Data identifying your source and origin of income (e.g. other sources of revenue other than the above, etc.).
- Data determining your expected trading behaviour (e.g. the purpose of using the company's products and services, the type and nature of your anticipated transactions, etc.).
- Data concerning your creditworthiness or other commercial activity.
- Data justifying your transactions where this is required on the basis of the company's applicable policies.
- Detailed data on household income and expenses.
- Assets.
- Asset value assessments.
- Assets bound as collateral for credit facilities.
- Whether you are bankrupt or fall within the scope of the insolvency framework.
- Deposits, loans and instalments for credit facilities held with other financial institutions.
- Personal data of guarantors and/or other collateral providers or financial dependents or persons constituting a single credit risk (see below the section on Persons Associated to Customers).
- Specific categories of data such as information regarding your health status and racial/ethnic origin.
- Whether your data is filed with the Central Information Register ("CIR") for issuers of Uncovered Cheques.
- If you are a shareholder, Director or Secretary, the ultimate beneficial owner, signatory or contact person or provider of collateral for a credit facility of a Legal Person which is a Customer of the Company, your status in relation to the above.

- For Customers which are Legal Persons, whether the data of a director of such Legal Person is registered in the CIR.

B. Personal Data of Persons Associated to Customers

The Company receives and processes your data and information if you are Persons Associated to Customers. The term Persons Associated to Customers includes the following:

- Persons constituting a single credit risk as explicitly defined in the regulatory framework, e.g. guarantors
- Persons providing collateral for credit facilities to the Company
- Persons who have concluded contracts Customers (e.g. a third party paying an instalment or makes a payment against a credit facility on behalf of Customers)
- Names of persons who constitute a group with Customers, as expressly specified in the regulatory framework.
- Politically Exposed Persons connected to customers, as follows:
 - "Direct close relatives" of politically exposed persons, a term which includes the following persons:
 - The spouse
 - Any companion considered by national law to be equivalent to the spouse
 - Children and their spouses or companions
 - Parents
 - Persons known as "close associates" of politically exposed persons, a term which includes the following persons:
 - Any natural person who is known to be a joint beneficial owner of a legal entity and legal vehicles with a person referred to above, or is known to be associated with that person with any other close business relationship
 - Any natural person who is the sole beneficial owner of a legal entity (company) and of legal vehicles (trusts) which were set up for the benefit of the person referred to in the previous point.

Personal data collected in relation to Persons Associated to Customers is limited to the name, identification information, information about whether such persons are, or they are related to a Politically Exposed Person and their relationship with the Customers. In addition, data may be collected on the financial status of such

persons if the management of a credit facility granted to Customers is being examined, in cases where the Customers intend to purchase real estate or where the Company has a legal obligation to do so.

C. Personal Data of Customers who receive services from third parties with whom the Company has a contractual relationship

The company occasionally concludes contracts with third parties who provide similar services for your better service.

D. Personal Data for the purpose of using the services of alternative networks

Where the Company provides you with the services of alternative networks such as the monitoring of your accounts through electronic applications, the following data is collected:

- your computer's IP address,
- the language you use when browsing,
- the type and version of your internet browser,
- the date and time of visit,
- the browsing history,
- your device's screen resolution - this is not kept after you exit the software,
- the type and version of your operating system,
- the manufacturer and the model of your device,
- your username,
- your telephone number,
- your location - upon adjustment made at your own choice.





3. HOW WE COLLECT YOUR PERSONAL DATA

An indicative list is provided which contains the ways in which your personal data may be collected by the Company:

A. We collect personal data directly from you in the following ways:

- Through your communication with us.
- Through cookies on our website (for more information please read our “Cookies Policy” which governs the use of cookies and which is posted on KEDIPES’ website).
- In the context of filing an application, inquiry, complaint or claim.
- Through telephone communication with us, which may be recorded.
- Through the Closed-Circuit Monitoring System (CCTV) which operates in our facilities.

B. From various other sources, including the following:

- The Group, in the context of data which had and/or have been lawfully collected from you or from third parties, which is transmitted and processed by KEDIPES and which is necessary for carrying on activities relating to the management of credit facilities and/or the management of real estate.
- Legal entities which are Customers of the company.
- Our service providers, representatives, partners, external associates, business partners or agents who carry out processing on our behalf.
- Third parties such as your family members if you are unable to provide information.
- Third parties you have authorized to provide certain information to us.

- Your legal advisors, for instance if they file a claim on your behalf.
- Providers of information on creditworthiness.
- The Department of the Registrar of Companies and Official Receiver, the press and other freely available sources over the Internet and/or the Official Gazette of the Republic.
- The Central Information Register (CIR) for issuers of uncovered cheques.
- The ARTEMIS Data Exchange Mechanism or other providers of credit information or information on commercial activities.
- The Cyprus Department of Lands and Surveys.
- International databases such as World Check.
- Sources available to the public like the press, the mass media and the Internet.

4. WHY WE USE YOUR PERSONAL DATA

- **For the performance of a contract or for the provision a service:** The purpose of processing your personal data is to manage your credit facilities and/or the management of real estate. Oftentimes, the management of your credit facilities and/or the management of real estate entails the conclusion of a contract, thus you will be obliged to provide your personal data for the conclusion of the contract. In case you do not provide your data, it will not be possible to conclude the contract, a fact that will lead to taking legal action against you such as, inter alia, the filing of a claim, the forced sale / seizure of collateral.
- **For contacting you:** We may use your personal data in order to communicate with you for administrative or operational purposes, to respond to or handle your inquiries and to send information directly or indirectly related to any contractual or other relationship with KEDIPES which we believe would be useful to you.
- **For recruitment purposes:** To assess your suitability for any position you may have applied for. Your recruitment implies the conclusion of a contract; you will thus be required to provide your personal data for the conclusion of such contract. If you do not provide such data, your recruitment will not be possible. For further information, please read the "Privacy Notice for Recruitment Candidates" which is also posted on KEDIPES’ website.
- **For improving our services:** We may use your personal data in order to improve your user experi-

ence, the content of our communications and our services.

- **For preventing fraud and detecting any unlawful or undesirable activities.**
- **Computer security:** To protect our website, our web platforms, our networks and our software systems.
- **For physical and Material Security:** to ensure the safety of our employees and the visitors to our premises and to protect our property.
- **Legal claims:** In some cases, we may have to use your personal data in order to handle and resolve legal disputes, to enforce the terms of any contract, agreement or arrangement that we have with you, or to comply with lawful requests by law enforcement authorities.

5. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

The Company is based on one or more of the following bases for processing your personal data:

- **Compliance with legal obligations:** In some cases, we use personal data in order to comply with our legal and/or regulatory obligations.
- **For the performance of a contract:** In cases where the use of your personal data is necessary for the performance of a contract.
- **For serving the legal and other interests of the Group:** We may use your data for serving our legitimate interests, such as, for instance, debt recovery and/or the management of the credit facilities provided by the Company or by the Group, assessing credit risk and deciding whether to grant services to you relating to credit facilities, loan restructuring and arrears management or management of terminated debts, as well for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- **Based on your consent:** In cases where you have consented to the collection and processing of personal data, the Company will use your consent as a legal basis. Whether your consent to data processing is requested will be clear at the stage of its collection. You can withdraw your consent at any time by contacting the company at dpo@kedipes.com.cy. It is understood that in cases where your consent will be requested, the Company will inform you in advance of your right to withdraw your consent at any time.

6. FAILURE TO PROVIDE PERSONAL DATA

The failure to provide your personal data for processing which is a legitimate or contractual obligation may result in the termination of the contractual relationship or that a contract may not be concluded because the contract cannot be performed with you. In addition, KEDIPES will be unable to comply with its legal obligations.

7. AUTOMATED DECISION-MAKING PROCEDURE FOR RECRUITMENT PURPOSES

KEDIPES does not reach recruitment decisions on the basis of automated processing. If we follow any such process in the future, we will inform recruitment candidates and will implement the appropriate measures in order to protect the rights, freedoms and lawful interests of candidates for recruitment.



8. HOW WE PROTECT YOUR PERSONAL DATA

We take appropriate legal, organizational and technical measures to protect your personal data in accordance with applicable data protection laws and the GDPR. We use various security technologies and procedures to protect your personal data from unauthorized access, disclosure, loss, use or alteration.

When we use a third-party service provider, the provider will be carefully selected and will be obliged to use appropriate measures to protect the confidentiality and security of personal data.

9. WHO HAS ACCESS TO YOUR PERSONAL DATA

Within the Group: We may disclose certain personal data about you within the Group, to employees authorised to handle data who need such access in order to perform the contractual, business and other legal obligations of the Group.

Outside the Group: Further information regarding the categories of persons to whom your personal data may be disclosed are set out below:

A. Our service providers, representatives, associates, external partners, business partners or agents such as:

- Companies managing non-performing loans.
- IT support providers.
- Courier services.
- Advisors.
- Immovable property valuers / quantity surveyors.
- Authorized representatives or associates of the Company for the purpose of carrying out work in the field of debt management and collection.
- Authorized associates of the company for the purpose of storing and destroying files (including documents and electronic files).
- Insurance companies for the purpose of concluding and/or renewing and/or performing and/or assigning an insurance policy.
- Third parties who process data for cloud computing purposes.
- Printing companies e.g. for letters, statements of account, etc.
- Financial and operational advisors.
- Authorized partners of the Company for the purpose of maintaining its systems.
- Call centre support companies.
- Potential or existing buyers/investors and their consultants, in connection with the sale of part or all of the Group's business or for the sale of the credit facilities portfolio or any rights, title or interest of the Group by virtue of a law or contract
- Any other third-party partners who provide us with support.

Service providers, representatives, associates, external partners, business partners or agents who cooperate with the Company must comply with the Company's

guidelines and policies in relation to the processing of personal data.

B. The Data Exchange Mechanism defined by the law in force from time to time, such as the "ARTEMIS" Mechanism.

C. Financial institutions, where necessary:

The Company also receives banking services from Hellenic Bank Public Company Ltd (hereinafter Hellenic Bank) for the purpose of facilitating its customers in the payment of their instalments or when making payments against their credit facilities. The authorized cashiers of Hellenic Bank will have access to your data (your account number) for the purpose of carrying out the transactions mentioned above, provided that you provide such data for the purpose of executing the transaction.

D. Professional advisors and auditors, such as, for instance, external legal advisors and accountants.

E. Courts, arbitrators or other judicial committees.

F. Governmental bodies and authorities, such as, for instance, the Central Bank of Cyprus, the Cyprus Police and the Auditor General.

10. PERIOD OF RETENTION OF PERSONAL DATA

Your personal data is processed for the purposes mentioned above. Personal data shall be retained for the period required for carrying out the purpose of processing. Thereafter, the data will be deleted, unless there is a legal, regulatory or other obligation to further retain them.

11. WHAT ARE YOUR RIGHTS

11.1 Right to Transparency

KEDIPES takes appropriate measures to provide you with any information and communication required by the Regulation relating to processing in a concise, transparent, intelligible and easily accessible form,

using clear and plain language. The information shall be provided in writing, or by other means, including, where appropriate, by electronic means. When requested by the data subject, the information may be provided orally, provided that the identity of the data subject is proven by other means.

This Privacy Notice forms part of KEDIPES' obligation to provide such information and part of your right to the provision of transparent information.

11.2 Right of Access

You have the right to request confirmation as to whether or not your personal data is processed and, if so, you have the right to access your personal data and the following information:

- The purposes of the processing,
- The relevant categories of personal data;
- The recipients or categories of recipients to whom the personal data was disclosed or will be disclosed, in particular the recipients of data in third countries or international organisations;
- The period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
- Your rights under the Regulation,
- Where personal data is not collected from you, any information available on its origin,
- The existence of automated decision-making;
- Whether your data is transferred to a third country or to an international organisation and the appropriate safeguards for its transfer.

This Privacy Notice forms part of KEDIPES' obligation and of your right. You have the right to receive a copy of your personal data which is processed free of charge. For additional copies that you may request and for repeated requests, KEDIPES may impose a reasonable fee for administrative expenses.

If you make a request by electronic means, and unless you request otherwise, the information will be provided in a commonly used electronic form. The right to obtain such information shall not adversely affect the rights and freedoms of other persons.

11.3 Right of rectification

You have the right to obtain from KEDIPES without undue delay the rectification of inaccurate personal



data that concerns you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement. Accordingly, KEDIPES has an obligation to keep your data up to date and may occasionally prompt you to provide up-to-date information.

11.4 Right to erasure

You have the right to request the erasure of personal data that concerns you without undue delay and KEDIPES shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- You are revoking specific explicit consent on which the processing is based and where there is no other legal ground for the processing;
- The processing takes place on the basis of the legitimate interest of KEDIPES and there are no overriding legitimate grounds for the processing, or you object to processing for direct marketing purposes;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation under union law or the law of a Member State to which KEDIPES is subject.

This right does not apply to the extent that the processing is necessary:

- (a) for exercising the right of freedom of expression and information;
- (b) for compliance with a legal obligation which requires processing by Union or Member State law to which KEDIPE is subject, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in KEDIPE,
- (c) for reasons of public interest in the area of public health,
- (d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, in so far as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing
- (e) for the establishment, exercise or defence of legal claims.

11.5 Right to Object

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data that concerns you, which is based on the fulfilment of a duty carried out in the public interest or the exercise of public authority entrusted to KEDIPE or on the basis of the legitimate interest pursued by the KEDIPE.

KEDIPE may continue to process the personal data if it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

11.6 Right to restriction of processing

You have the right to restrict the processing of your personal data when one of the following applies:

- (a) The accuracy of your personal data is contested by you, for a period enabling KEDIPE to verify the accuracy of the personal data;
- (b) The processing is unlawful, and you oppose the erasure of your personal data and you request the restriction of their use instead;
- (c) KEDIPE no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims;
- (d) You object to processing based on the fulfilment of a

duty carried out in the public interest or in the exercise of public authority entrusted to KEDIPE or based on the legitimate interest pursued by KEDIPE, pending the verification whether the legitimate grounds of KEDIPE override yours.

Where processing has been restricted in accordance with your right mentioned above, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.



11.7 Right to data portability

You have the right to receive your personal data, which you have provided to KEDIPE, in a structured, commonly used and machine-readable format and you have the right to transmit those data to another data controller, where:

- (a) The processing is based on your consent or on a contract;
- (b) The processing is carried out by automated means.

In exercising this right, you have the right to have the personal data transmitted directly from KEDIPE to another controller, where technically feasible. Your right to portability is exercised in accordance with the KEDIPE's policy and provided that the right to erasure has not been exercised.

The right to portability does not apply to processing necessary for the performance of a task carried out in

the public interest or in the exercise of official authority vested in KEDIPE.

This right must also not adversely affect the rights and freedoms of others.

11.8 Right to withdraw consent

Where processing is based on your consent, you have the right to withdraw your consent at any time without prejudice to the lawfulness of processing based on consent before its withdrawal.

How to exercise your rights

You can exercise the above rights by addressing a request to KEDIPE by post or email, after completing the "Application to Exercise a Right" and using the contact details set out in section 1 of this Privacy Notice or on the Company's website in the section "Data Protection".

We assure you that we will make every effort to respond promptly to your request and inform you of the actions taken regarding your request.

Please note that in some cases we will not be in a position to fulfil your requests, mainly for legal reasons. However, we reiterate that we will always respond to your requests within a reasonable period of time and in case we will not be able to fulfil your request, we will explain why.

The above rights are exercised free of charge unless requests are manifestly unfounded or excessive, in particular due to their repetitive character. In such a case, KEDIPE may impose a reasonable fee or refuse to follow up on the request.

Submission of a complaint to the Office of the Commissioner for Personal Data Protection

If any request that you made has not been implemented in a satisfactory manner or the processing of your personal data is against any provision of the Regulation, you have the right to file a complaint with the Office of the Commissioner for Personal Data Protection in accordance with the instructions provided on the website <http://www.dataprotection.gov.cy>.

12. TRANSFER OF DATA TO THIRD COUNTRIES

KEDIPE may transfer personal data to recipients who are outside the EEA, only in cases where the transfer is necessary for the performance of your contract or where this is required by the law. In such cases, the necessary measures shall be taken, including standard contractual clauses, an adequacy decision or other appropriate safeguards in accordance with Article 46 of the GDPR. In the event that we use such agreements or similar measures, we may be able to provide you with a copy or sample if you contact us at dpo@kedipes.com.cy.

13. CHANGES TO THE PRIVACY NOTICE

The Company reserves the right to amend or update this Privacy Notice. Any amendment or update will be posted on KEDIPE's website and will mention the date of its validity/application in its title. We recommend that you regularly refer to KEDIPE's website and to the Privacy Notice in order to remain updated on the manner in which the Company processes your personal data.