

Personal Data Notice_ Debt Management

ALSVIT PC with registered office at 166 Syggrou Avenue, 6^a, 176, Athens (Greece), and with CIF 129142506000 ("ALSVIT") in the context of its activities related to the management of investments or debt collection management or debt collection management, and always with a sense of responsibility to comply with the regulatory and legislative and legislative framework, gives paramount importance to the processing of your personal data, complying with the treatment of your personal data, complying with the guarantees of legality, transparency and respect for the data collected.

The purpose of this statement is to inform you as general operators about the processing to which your personal data are subject into which your personal data are subject in the context of the execution of its operations in accordance with the national data protection legislation and the General Data Protection Regulation (2016/679/EC) of the EU (GDPR).

This notice is primarily addressed to natural persons (debtors, guarantors, etc.) whose debts are included in the credit portfolios managed by ALSVIT within the framework of the credit institutions/beneficiaries of the receivables, as well as to any natural person related to these persons and/or their natural person related to these persons and/or their debts (guarantee providers, family members, legal representatives, lawyers, counterparties, etc.), family members, legal representatives, lawyers, counterparties, shareholders and final beneficiaries of the legal entities, etc. of the legal entities, etc.) and to all persons dealing with the company in general.

Please note that if the debtor is a legal entity, this Notice is addressed to its representatives, partners, members of its administration, if their personal data are processed by ALSVIT and in the processed by ALSVIT and insofar as they are not accessible to the public.

For the purposes of a proper understanding of the present statement:

Personal data means all the information that concerns you as a living natural person and can lead to the identification of your identity (such as, but not limited to, your full name, home address, e-mail address, occupation, salary, marital and property status, etc.).

Processing means an operation or series of operations carried out on personal data such as, but not limited to, collection, organization, storage, use, disclosure by transmission and a series of other operations carried out on such data such as restriction, erasure, or destruction.

Data subject means the person whose personal data are processed.

Purpose:

a) **Loan management and recovery:**

We use your personal data primarily to carry out the tasks necessary to manage your loan, and to ensure the repayment and recovery of debts owed to our customers. In this regard, we will use your data to carry out activities such as managing accounts, sending payment notices, sending you written, emailed or electronic information in writing, by e-mail or by telephone about the amount owed and the establishment of and the establishment of agreements on the payment schedule.

b) **To maintain and re-establish contact with you**

We will use your personal data to contact you in connection with the processing of your loan or to manage your loan or to manage the process of buying and selling or renting a property. property. If it is impossible to contact you or if the information, we have about you is inaccurate, we will use your personal information to contact you. inaccurate, we will use your information to obtain your updated contact details (such as phone number, address, etc.). (Such as telephone number or address).

c) **To detect fraud and carry out preventive inspections**

We will use your information to carry out various inspections and analyses related to fraud prevention and related to the prevention of fraud and money laundering and terrorist financing, in accordance in accordance with industry standards and other legal requirements.

Legitimation:

ALSVIT is a company that provides financial and credit management services to other companies. The legal basis for the processing of personal data contained in these credits is:

- (i) The **legitimate interest** of the company in the fulfillment of the legal obligations to which it is subject in the execution of the contracts signed when entrusted with the management of the credits. That is, when contractual reasons make the collection and use of personal data necessary (provided that the interest of the interested parties is not excessively affected) for the achievement of the statutory purpose of the Company (both extrajudicially and judicially)
- (ii) The **consent** of the data subjects (indicative: borrowers, guarantors, candidates interested in working for the company, visitors to its website). Moreover, in this context and in accordance with its statutory purpose, ALSVIT may collect certain special categories of personal data, as defined in Article 9 of the GDPR (e.g., medical health certificates, medical reports, criminal records, etc.) after the explicit consent of the data subjects, submitted to the company in the context of a process of amicable repayment of their debts with improved or special terms of settlement of the claim.
- (iii) The **legal obligations of ALSVIT** the obligations of ALSVIT for the identification and evaluation of borrowers, guarantors, co-signers, suppliers, service providers in the framework of the prevention and money laundering and financing of terrorism.

- (iv) The **business development and commercial promotion** of ALSVIT operations through promotional activities for new actions and programs implemented from time to time.

Categories Of Data:

ALSVIT may collect and process personal data from third parties related to the debt (principal debtors, co-debtors, guarantors, etc.), investors, buyers (individuals), suppliers, of the following categories:

Identification data: full name, ID, date, and place of birth, etc.

Health data collected under the conditions of the law and regulatory framework when necessary.

Residential and contact details: postal and email address, landline, and mobile phone numbers.

Financial and patrimonial data: occupation, income, income, data on the tax situation, tax returns, declarations of accounts or banking products, etc.

Information on solvency: unpaid balances, solvency statement, debts with financial institutions and public institutions.

Data Sources

The above data are either collected - produced by us (e.g., evaluation for the purposes of suppression of money laundering) or collected from various sources such as:

- You and your duly authorized representatives
- The original holder of the claim or the seller of the claim
- Publicly accessible sources (Land registries, Courts, Public Services, Independent Authorities)
- Alternative communication channels (our website).

Recipients of Personal Data

Based on the responsibilities assigned, ALSVIT staff has access to your personal data. Furthermore, we may transfer your personal data to any affiliated parent company - subsidiary company or to third parties to the extent necessary for the purposes set out herein.

In such circumstances the recipients may be:

- The Financial Intelligence Unit - FIU or any competent administration of Justice.

- Potential or existing debt holders, i.e., credit/financial institutions, companies acquiring claims or special purpose entities in the context of transfer of receivables
- Companies providing information systems development and support services, companies providing information society services (e.g. electronic messaging platforms), companies providing digitalization and records preservation services, companies providing custodial services, companies providing documentary notifications and generally companies assisting the company in effectively fulfilling its statutory role by providing expertise and support
- Auditors or accounting firms, professional advisors for the fulfilment of the company's obligations

Transfer of Data to a Third Country or an International Organization

We do not transfer your personal data directly to third countries (outside the European Union/European Economic Area) or international organizations, however your personal data may be transferred to third countries (outside the European area) if an adequate level of data protection is ensured by the third country, in accordance with a relevant decision of the European Commission, and all necessary safeguards and assurances with regard to lawful processing by the recipient have been taken. If this is not the case, transmission may only take place to fulfil a contractual or statutory obligation or if it is necessary for the defense of the company's legitimate interests or the establishment of legal claims or, finally, if you have given your consent.

Your Rights and How to Exercise Them

As interested parties, you can exercise the following rights by sending your request electronically to dpo@alsvit.com or physically in our offices located at 166 Syggrou Avenue, 6^a, 176, Athens (Greece), together with a document that proves your identity. ALSVIT will provide you with information on the measures taken as soon as possible and, in any case, within a maximum period of 1 month from receipt of the request. The company reserves the right to extend this period by 2 months, considering the complexity of the matter and the number of requests received in relation to its rights below.

- Right of **access** to your personal data if they are processed by ALSVIT as well as the source of origin or the purposes of processing, the recipients, and the timeframe of processing. The Company, upon request, shall provide you with a free copy of your personal data held. For additional copies, upon request, the Company may charge a reasonable fee for administrative costs.
- Right of **rectification** in case of inaccurate data to correct or complete incomplete data.
- Right to **erasure** ("right to be forgotten") of your personal information, without prejudice to the obligations and legal rights of ALSVIT to maintain it in accordance with the applicable laws and regulations, if there is no valid reason for us to continue

processing it or you withdraw your consent and there is no other legitimate reason for the processing.

- Right to **restrict the processing** of your personal data if, either the accuracy of the data is contested, or the processing is unlawful, or there is no legitimate reason for its continuation.
- Right to **portability** of your personal data. The fulfilment of this right shall be without prejudice to our legitimate rights for the maintenance of data in the context of a duty regarding public interest and it is satisfied through a direct transfer of your personal data by us to other organizations that you name.
- Right to **object** on grounds relating to your situation where your personal data are processed for the performance of a task carried out in the public interest.

Finally, if personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of personal data for such marketing reasons. The above rights may not be fulfilled in case the processing or maintenance of your data is necessary for the establishment, exercise, or maintenance of the rights of the Company.

The legal and regulatory framework applicable to the processing of personal data is constantly monitored by the Company and we reserve the right to revise this notice from time to time. As such, we encourage you to visit this website periodically to keep up to date with any amendments.