

Privacy Notice Of

Silverton Servicing Solutions Greece

A.E.D.A.D.P.

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1. Field of Scope

This privacy notice lays out the way Silverton Servicing Solutions Greece Financial Solutions A.E.D.A.D.P. in its capacity as both data controller and processor (hereinafter referred to as “**The Company**”) collects, uses, processes, stores, manages, and protects the personal, commercial and financial information (hereinafter referred to as “**Personal Data**”) of borrowers and guarantors, be it legal entities sole proprietorships or individuals (hereinafter referred to as “**Borrowers**”) or of any other third party, so as to meet the data protection standards of the company and comply with the applicable data protection law. This privacy policy shall apply to (i) all personal, commercial and financial information of the Borrowers pertaining to non performing loans currently managed by Silverton Servicing Solutions Greece (ii) pertaining to third party supplier or contractor data obtained during the use of their respective services (brokers, appraisers etc.) (iii) pertaining to candidate employee data (iv) pertaining to individuals (Interested parties) who participate in the disposition process of real estate property v) pertaining to Silverton Servicing Solutions Greece’s website visitors (<https://silverton-group.gr/el/start-gr/>) hereinafter referred to as “Website”. Silverton Servicing Solutions Greece is bound to protect the privacy of the Borrowers and other data subjects and adhere to the Data Protection legislation currently in force.

This policy shall not apply to information collected through any other website, services, products, platforms or for practices of companies that we do not control. We are not responsible for any personal data protection practices pertaining to websites, services, products, platforms of other companies.

We also describe the measures we take to protect the security of this information, the retention period, and how those who deal, in any way, with the Company can contact us directly about our practices for managing their personal information.

2. Categories & Types of Collected Data

The Personal Data processed in any way by the Company include, among others, your full name, contact details (postal address, mobile and fixed telephone number, e-mail address), date of birth, VAT number, Taxi Identification Number, Tax Office, financial data (data concerning your salary and assets), data related to the assessment of the risk of money laundering and other information you provide voluntarily (e.g. CVs) or by law or in fulfilment of an existing contract, either directly to the Company or to another controller who passes it on to the Company under contract.

Indicatively:

A. Borrowers (principal debtors and guarantors): full name (borrower & guarantor), securities (real estate assets etc), behavioural data (payment rejection or acceptance etc), financial information (outstanding balances, solvency status), residential information, vat number, national ID number, pertinent to the case files, contact particulars (telephone, e-mail, fax nr), EFKA declarations, E3,E1, E9 tax declarations, court judgments, prior approval or rejection of applications filed by the data subjects, outstanding balances, outstanding banking debts, employment status (i.e. unemployment card), banking statements regarding bank accounts or banking products, property titles, depositary receipts, criminal record.

B. Candidate Employee Data: full name, residential information, contact particulars (telephone, e- mail, fax nr), previous employment information.

C. Brokers: full name, address, VAT number, telephone number, E-mail, Hellenic Business Registry registration number.

D. Appraisers: full name, VAT number, Hellenic Business Registry registration number, Internal registration number, E-mail.

E. Interested Parties: full name, telephone number, VAT number, address, offer amount.

F. Website Visitors: statistical data on visitors' behaviour on the website (statistics cookies) as well as browsing behaviour (marketing cookies).

Also, our company does not process special categories of data (e.g. health data and data defined in Article 9 of the GDPR).

Except in cases where the above data a) have been communicated to the Company by you or a third party in order to safeguard the interests of the Company b) the processing is necessary for reasons of public interest e.g. investigation of a criminal act under the law for the prevention and suppression of money laundering and terrorist financing, which has been disclosed to us by virtue of a court act, a prosecutor's order or other general judicial proceedings, by which we have been instructed to take specific actions, etc.

Declaration Regarding The Processing of Personal Data By Silverton Servicing Solutions Greece (by its capacity as Data Controller and Processor - in accordance with the General Data Protection Regulation EU 679/2016)

Why will you process my Personal Data (PD)?

Silverton Servicing Solutions Greece is a financial services and loan management company who undertakes the management of banking loans of companies and individuals, in compliance with Law 4354/2015 (Governmental Gazette Issue A' 176/16.12.2015), as amended. In addition Silverton Servicing Solutions Greece abides by the existing Greek banking law provisions and regulations.

Said management is conducted on the basis of Silverton Servicing Solutions Greece' statutory purpose, such as described in paragraph 6 hereof. The lawful basis of the personal data processing contained in those loans, is the company's legitimate interest and in some instances the consent of the data subjects (borrowers & guarantors and website visitors).

In addition, Silverton Servicing Solutions Greece may collect personal data of candidate employees who are interested in working with Silverton Servicing Solutions Greece for the sole purpose of examining the possibility of a future collaboration - employment. The prerequisite of the data collection is the consent of the data subject who provides the necessary information.

Only data that are essential for those purposes, are being collected and processed. The processing of these data may also be necessary for compliance with legal obligations.

Information automatically collected when visiting and interacting with the Website: We inform you that your personal data and information that are collected and processed when you manage your account in the Website, are appropriate to the purpose for which they are collected.

In particular, when visiting and interacting with the Website, certain information may be automatically collected, such as statistical data on visitors' behaviour on the website. For more information about the use of cookies, please see paragraph 10 below.

In more detail your data are processed for:

- a) The fulfilment of the terms of the existing contract between us.
- b) The processing, recording and completion of the tasks assigned to us by you or by other persons (natural or legal persons) acting as data controllers and are bound by written contracts.
- c) To be able to contact you for additional information or to inform you about the debts that we service and concern you. Every type of communication is recorded and filed.
- d) In order to fulfil the Company's obligations as Data Controller.
- e) To inform you of a matter of interest to you (e.g. a new subsidized investment scheme, if you are already a client of the Company).
- f) To evaluate and improve our professional activity (including the development of new products and services).
- g) To evaluate and improve our business (including the development of new products and services) and to manage the Company's operational and financial risks.
- h) For any other purpose, provided we have obtained your prior consent, which you may withdraw at any time, but without prejudice to the lawfulness of the processing operations based on your consent prior to any withdrawal.
- i) To defend the Company's legitimate interests (enforcing legal requirements and conducting our business in accordance with all applicable laws and policies).
- j) In the context of the Company's compliance with obligations established by the applicable legal regime (e.g. for compliance with the applicable tax legislation).
- k) In the context of the Company's compliance with the applicable legislation, where disclosure and transmission to the competent Supervisory, Independent, Police, Judicial, Police, Judicial Authorities and Public Authorities in general, whether legal entities (under private law or legal entities under public law) in the exercise of public authority, is required.

3. Data Collection Points

- 1) Borrowers - Guarantors – Co-Borrowers – Collaterals 'owners (via E-mail) - A
- 2) CVs from candidate employees - B
- 3) Bank Institution, Other servicers (transfer of data in accordance with the service level agreement) - A
- 4) Third party suppliers-service providers - C, D

- 5) Individuals (Interested parties) – E
- 6) Borrowers/Guarantors after changing/updating their data - A
- 7) Website visitors - F
- 8) Files/Documents kept by the Company under the name “Banking Information Systems” and the distinctive title “Teiresias”
- 9) Other sources through which data are publicly accessible (e.g. Cadastre, Business Registry) either electronically or by any other means.
- 10) Other data bases kept by the General Secretariat for Financial Sector & Private Debt Management, such as the extrajudicial mechanism, where the borrowers accept that their data are going to be notified to the creditors.

4. Legitimate Interest - Intended Purpose - Lawful Basis for Data Processing

Silverton Servicing Solutions Greece operates as a financial services and loan managing company in compliance with Law 4354/2015 and is licensed by the Bank of Greece to manage banking credit in accordance with applicable Law.

Silverton Servicing Solutions Greece within the framework of the general business activity as described above, has acquired and maintains a database containing the above-mentioned (under 2) data, which it processes in various ways in pursuit of its statutory objectives.

More specifically our company processes your data if the processing is necessary to:

- a) Identify your data when managing your debt under either the original contract or the signing of a settlement agreement.
- b) Service your debt arising from your loan agreement
- c) Service your business relationship with the company (e.g. submitting requests and questions) and the general communication.
- d) Fulfill Silverton's duties in accordance with the public interest under the applicable legal, regulatory and supervisory framework (e.g. legal and regulatory framework on the prevention and suppression of money laundering under Law 4557/2018, Code of Conduct of the Bank of Greece under the Law 4223/2013, Law 3758/2009 on

telephone communication with debtors, etc.).

e) Comply with legal obligations.

The processing may be based on your prior explicit consent, which you may withdraw at any time, without prejudice to the lawfulness of the processing based on your consent prior to its withdrawal.

5. Transfer of Data to Third Parties

Silverton Servicing Solutions Greece reserves the right to disclose your personal data to any member of its affiliate/subsidiary companies (parent company and its subsidiaries) or other third parties to the extent it is reasonably necessary for the purposes determined in this notice and in particular:

- Your data will be transferred to the departments of Silverton Servicing Solutions Greece that are competent and necessary for the fulfilment of the company's statutory purpose.
- Your data may be transmitted and become accessible by third party suppliers or service providers (legal entities) such as consulting firms, law firms, bailiffs, notaries, IT service providers, Engineers, Real Estate Companies, debt notification and negotiation companies of Law 3758/2009 etc., with which we have entered into contractual agreements (and are bound by GDPR) for the purpose of fulfilling our company's statutory purpose (loan management services) in a correct and within our contractual terms framework.
- Your data will not be disclosed to third parties unless this is necessary for the provision of services or to comply with legal requirements or to comply with a provision of law or to comply with obligations to public authorities in the exercise of their public authority or to carry out inspections by supervisory authorities and investigations.

- Your data may be disclosed to bank's legal and disputes department in the frame of servicing the loans.
- Your data may be disclosed to cloud hosting providers for the purpose of storing and safeguarding the data with the appropriate technical and security measures.
- Your data may be transmitted, become accessible and processed by third party suppliers such as consulting firms within the European Union or in countries with an adequate level of data protection (Switzerland), which apply the appropriate technical, physical and administrative security measures for the protection of the data from loss, misuse, damage, alteration, unauthorized access and disclosure, as provided by article 32 of the GDPR 679/2016. Your data (specifically data of financial nature) may be disclosed to the public and regulatory authorities (Authority Against Money Laundering or to Bank of Greece, State General Accounting Office) in compliance with pertinent legal obligations of Silverton Servicing Solutions Greece.
- Third parties after your consent.
- Insurance institutions, Public Organizations, Chambers of Commerce, Public Services
- Supervisory, Judicial, Independent and other Authorities in Greece or Europe for the fulfilment of a legal obligation
- Auditors and Audit Firms

In such cases, the Company will inform you specifically about any transfer of your data to the above recipients, if provided for by applicable legislation.

The Company may disclose your personal data to the competent supervisory, police, judicial, independent and public authorities in general if this is required by the applicable legal framework and if a request is made, without your prior notification.

During all data transfers, we always take all appropriate measures so as to ensure that the transmitted data are the minimum required for the intended processing purpose and that the conditions for legitimate and lawful processing will always be met Silverton Servicing Solutions Greece' partners to whom the personal data may be transferred, have signed the necessary data processing agreements or have made specific guarantees around transfers of personal data by implementing in their agreements Standard Contractual Clauses (Model Clauses) where necessary.

6. Personal Data Retention Period

The data retention period depends on the lawful basis of processing, as set out in detail below:

- In case the lawful basis for processing is the exercise of legitimate interest, the processing of personal data is carried out for as long as it is considered necessary for the achievement of the statutory purpose of Silverton Servicing Solutions Greece for a maximum period of fifteen (15) years. In addition, we will retain said data for as long as it is necessary to comply with the specific legislation and regulations in force.
- In case the data subjects have given their consent for the processing of their data, we shall retain their data until the granted consent by the data subject has been withdrawn. In case the consent is withdrawn for any valid reason, we shall retain them for as long as it is required and for a maximum period of fifteen (15) years.
- In case the lawful basis for processing is the implementation/execution of the contract, we shall retain your data for as long as you retain the contractual relationship with Silverton Servicing Solutions Greece, in hard copy and in electronic form or we shall retain them for as long as it is required for a maximum period of fifteen (15) years.
- Data of financial nature processed by Silverton Servicing Solutions Greece' in house AML & Compliance department, are subject to a five (5) year retention policy, following the termination of the relationship under review and provided no tax issue arise.
- In case the lawful basis for processing is to take necessary steps at the request of the data subject prior to entering into a contract (such as in the case with CVs of the candidate employees), we shall retain the pertinent personal data until the parties agree to collaborate by signing an employer-employee agreement. In the event that no employment takes place, the data contained in the CVs are removed from Silverton Servicing Solutions Greece' databases within two (2) years.

In case of litigation, the personal data will be kept until the end of the pending litigation and the issuance of an irrevocable court decision or the expiry of the required time limits.

7. Rights of the Data Subjects

You may exercise, as the case may be, the rights deriving from the applicable Greek Legislation and the General Data Protection Regulation (Regulation (EU) 2016/679) which are as follows: a. the right of information (article 13), b. the right of access (article 15), c. the right to rectification (article 16), d. the right to erasure “right to be forgotten” (article 17), e. the right to restriction of processing (article 18), f. the right to data portability (to receive your personal data in a structured and commonly used format (article 20 - where applicable) and g. the right to object (article 21) which applies to certain data processing activities.

- These rights shall be exercised free of charge for you by sending a relevant letter (relevant document is uploaded on the Company’s Website) to the Data Protection Officer (DPO) of Silverton Servicing Solutions Greece via e-mail to contact@silverton-group.gr / inquires@silverton-group.gr. In case, however, the aforementioned rights are exercised excessively and without good cause thus causing us administrative burden, we may charge you with the cost related to the exercise of the respective right.
- In case you exercise any of your rights, we will take all appropriate measures available for the satisfaction of your request within thirty (30) days following the receipt of the relevant request. We may either inform you on the acceptance of your request or on any objective grounds that hinder the processing of your request. In any case of a request, the provisions of the Regulation are reserved. The above deadline may be extended by two (2) months if the request is complex or if there are a large number of requests. The company will inform you of the reasons for the delay within one month.
- Notwithstanding the above, you may at any time object to the processing of your Personal Data, by withdrawing your consent (article 7, par. 3 of the GDPR 679/2016) by sending a letter to the Data Protection Officer (DPO) via e-mail to contact@silverton-group.gr. This right applies only in cases where the lawful basis for the data processing is the consent of the Data Subject.

8. Data Processing by Silverton Servicing Solutions Greece

Silverton Servicing Solutions Greece applies throughout the data processing procedure, the appropriate technical, physical, and administrative security measures for the protection and security of the personal data from loss, misuse, damage or modification, unauthorized access and disclosure, in compliance with article 32 of the GDPR 679/2016, in order to ensure the appropriate security level against those risks. Those include, among others, as the case may be: a) application of encryption protocols b) the ability to ensure confidentiality (article 90 GDPR 679/2016), integrity, availability, and resilience of processing systems and services on an ongoing basis, c) the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident, d) a process for regularly testing, assessing and evaluating the effectiveness of technical and organizational measures for ensuring the security of the processing. Moreover, Silverton Servicing Solutions Greece shall take measures so as to ensure that any individual person acting under the authority of the data controller or of the processor, who has access to personal data, shall not process those data except on instructions from the data controller and limits access to your personal information to educated and authorized employees.

Indicative security measures applied by Silverton Servicing Solutions Greece are as follows:

Silverton Servicing Solutions Greece maintains a disaster recovery unit for its servers on separate premises.

Silverton Servicing Solutions Greece maintains a dedicated subject access rights policy regulating the level of access to the company's systems/working stations

The company performs ongoing infrastructure checks to detect weaknesses and potential intrusions, vulnerabilities in systems etc.

The company uses https protocols for secure and encrypted client communication with Silverton Servicing Solutions Greece.

The company uses the open standard protocol to access Lightweight Directory Access Protocol (LDAP) directory services and uses encrypted passwords.

9. Profiling

We use the information we obtain to assess the debtor composition in a portfolio using clustering analysis for credit default probabilities and for risk analysis purposes. These reports are used for internal purposes only and are not being disclosed to any other third parties. Silverton Servicing Solutions Greece does not maintain blacklists of any kind.

Furthermore, decisions based on automated procedures may be lawfully taken for the purposes of monitoring and preventing fraud against you, as well as for the assurance and reliability of the services we provide to you or, where such processing is necessary for the conclusion or performance of a contract, such as a credit assessment based on personal data obtained directly from you or from a search of the financial behaviour database from the file of Tiresias S.A.

For the latter, the subject's income, financial obligations, profession, compliance with contractual obligations under previous financing received from a financial institution are taken into account as criteria for assessing your creditworthiness for the provision of services within the scope of our company's purpose.

10. Cookies

What are cookies and why Silverton Servicing Solutions Greece uses them: Cookies are pieces of information, in the form of very small text, usually consisting of letters and numbers, which are stored in the browser used by the individual Customer/User (Chrome, Mozilla Firefox etc.), assisting us to make the Website work more efficiently. Cookies do not in any way cause damage to users' computers or files stored on them. Information stored in cookies is used for identification purposes. In this way we manage to operate the Website in an efficient way for the service we offer. The Website uses Cookies to provide Clients/Users with information, to perform the services provided through it, and to improve the level of service provided.

- Under no circumstances will the cookies contain personal information or information that will allow anyone to contact the Website's visitors by phone, email, etc. Additionally, using cookies does not provide access to your computer's documents or files.

- Additionally, cookies help us evaluate the performance and traffic of our Website, thus improving its presentation and content, according to the preferences of our visitors.
- The essential technical cookies are of critical importance for the proper operation of the Website as they allow you to browse the Website and make use of its functions. These cookies do not identify your personal ID. Without these cookies, we are unable to offer proper functioning of the Website. In addition these cookies allow the Website to store and remember your preferences (preference cookies) so as to provide improved and personalized services.
- If the Client/User accepts the use of cookies, the following types of cookies may be used: marketing & statistics cookies as per above.
- You do not wish to use cookies? You can enable, disable, or even completely erase cookies through the setup options in your browser. For example, in Chrome, you can click the Chrome menu and then select Settings / Privacy / Content Settings and change the cookies settings to suit your preferences. If you choose to disable cookies, some parts of the Website and / or the Application may not work properly.

11. Submission of Complaint Appeal

- For any issue regarding the processing of your personal data, you may contact us via e-mail to contact@silverton-group.gr / inquiries@silverton-group.gr or to our postal address «Silverton Servicing Solutions», Str. 25 Akademias, P.C.10671, Athens
- Moreover, you shall always be entitled to contact the Hellenic Data Protection Authority, which may accept the submission of relevant complaints in writing at its protocol in its offices at Kifisias Ave. 1-3, Postal Code 115 23, Athens or by e-mail (complaints@dpa.gr) in accordance with the instructions indicated on its website.

12. Amendments

This policy may be renewed from time to time, due to amendments to the related legislation or change to the corporate structure of Silverton Servicing Solutions Greece. Thereby, we encourage the data subjects to periodically visit this site so as to be informed regarding recent information of privacy practices.

APPENDIX

Of the different types of cookies available, Silverton Servicing Solutions Greece uses the following:

Technically necessary or essential cookies	Technically essential cookies are essential for the navigation in the Website and its proper operation
Marketing Cookies Data retention: persistent cookie	These cookies, which may be placed on your device by us or our trusted third party service providers, remember that you have visited a website and use that information to provide you with content or advertising which is tailored to your interests. This type of processing is also known as online behavioural advertising (OBA) and is done by grouping together shared interests based upon web browsing history.
Statistics or analytical performance Data retention: 2 years	Analytical performance cookies are used to monitor the performance of our Services, for example, to determine the number of pageviews and the number of unique users a website has. Web analytics services may be designed and operated by third parties. The information provided by these cookies allows us to analyse patterns of user behaviour and we use that information to enhance user experience or identify areas of the website which may require maintenance. The information is anonymous (i.e. it cannot be used to identify you and does not contain personal information such as your name and email address) and it is only used for statistical purposes.

