

KARTA II PLC- PRIVACY POLICY

1. Introduction

1.1 This is the Privacy Policy of Karta II PLC which is referred to as the “**Company**”, “**us**” or “**we**” throughout this Privacy Policy. This Privacy Policy provides details of the way in which we Process Personal Data in line with our obligations under Data Protection Law.

1.2 Capitalised terms used in this Privacy Policy are defined in the Glossary in Annex I.

2. Background and Purpose

2.1 The purpose of this Privacy Policy is to explain what Personal Data we may process and how and why we might process it. In addition, this Privacy Policy outlines our duties and responsibilities regarding the protection of such Personal Data. The manner in which we Process Personal Data will evolve over time and we will update this Policy from time to time to reflect changing practices.

2.2 Pursuant to the Servicing Agreement dated 16 August 2011, as amended and restated on 23 March 2020 and 23 September 2020, the Company has appointed Eurobank S.A., incorporated in the Hellenic Republic with registered number 154558160000, whose registered office is 8 Othonos Street, Athens 10557, Greece, as a Servicer (hereinafter referred to as the “**Servicer**”) to service a portfolio of Greek credit card receivables owned by the Company.

3. The Company as a Data Controller

3.1 The Company will act as a Data Controller in case Personal Data is provided to us by (i) individuals in connection with the management, operation and administration of the Company and (ii) the Servicer in respect of underlying borrowers and related persons under the Greek credit card receivables owned by the Company. Such individuals will generally be limited to the following:

- (a) Directors, assigned employees and officers of the Company;
- (b) Employees of service providers who provide services to the Company; and
- (c) Borrowers who have entered into credit card receivable arrangements with Eurobank S.A. (or a related entity).

(each, a “**Data Subject**”).

The types of Personal Data the Company might process are described in Annex II.

3.2 Personal Data may be processed by the Company for the following purposes:

Purpose of Processing	Lawful Basis under applicable Data Protection Law
To comply with legal and regulatory obligations applicable to the Company from time to time, including, without limitation, applicable tax, anti-money laundering and other counter terrorist financing legislation.	To comply with legal obligations to which the Company is subject. In accordance with the Company’s legitimate interests to comply with laws.

Purpose of Processing	Lawful Basis under applicable Data Protection Law
To administer and manage the portfolio of credit agreements originated by Eurobank S.A. and sold to the Company and exercise its rights under the transaction documents pursuant to which the Company purchased the credit card receivables and appointed the Servicer to service the credit card receivables.	For the purposes of performing a contract.

4. The Company and Data Processors

- 4.1 The Company will engage certain service providers to perform certain services on its behalf which may involve the Processing of Personal Data. To the extent that such Processing is undertaken based on the instructions of the Company and gives rise to a Data Controller and Data Processor relationship, the Company will ensure that such relationship is governed by a contract which includes the data protection provisions prescribed by applicable Data Protection Law.
- 4.2 The Servicer acts as a separate and distinct Data Controller in relation to the borrowers' data and only supplies anonymised (non-personal) data to the Company, unless otherwise specifically instructed. Information regarding the processing of Personal Data by the Servicer is available at: <https://www.eurobank.gr/en/gdpr-general-data-protection-regulation>, which the borrowers should also consult in relation to the processing of their Personal Data by the Servicer.

Individual Data Subject Rights

- 4.3 Data Protection Law provides certain rights in favour of data subjects. The rights in question are as follows (the “**Data Subject Rights**”):
- (a) the right of a data subject to receive detailed information on the processing (by virtue of the transparency obligations on the Data Controller);
 - (b) the right of access to Personal Data;
 - (c) the right to amend and rectify any inaccuracies in Personal Data
 - (d) the right to erase Personal Data (right to be forgotten);
 - (e) the right of data portability;
 - (f) the right to restrict Processing;
 - (g) the right to object to certain Processing; and
 - (h) the right to object to automated decision making, including profiling.
- 4.4 These Data Subject Rights will be exercisable by Data Subjects subject to limitations as provided for by applicable Data Protection Law. Data Subjects may make a request relating to the servicing of their credit card receivables to the Company by addressing their request in writing to the Servicer’s Retail Business Planning and Customer Excellence Retail Banking at 6 Siniosoglou Str. 14234, Nea Ionia, Greece or via email

at info@eurobank.gr. Requests shall be dealt with in accordance with applicable Data Protection Law.

5. **Data Security**

5.1 The Company will make reasonable efforts to hold any Personal Data provided by Shareholders / noteholders / borrowers / the Servicer in confidence and in accordance with applicable Data Protection Law. Accordingly, we and our service providers have technical and organisational measures in place to protect Personal Data from unlawful or unauthorised destruction, loss, change, disclosure, acquisition or access. Personal Data are held using a range of security measures including, as appropriate, physical measures such as locked filing cabinets, IT measures such as encryption, and restricted access through approvals and passwords.

6. **Disclosing Personal Data**

6.1 From time to time, we may disclose Personal Data to third parties, or allow third parties to access Personal Data which we Process (for example, where a law enforcement agency or regulatory authority submits a valid request for access to Personal Data) and for the purposes of fraud prevention or investigation. In relation to Shareholders / noteholders / borrowers, the Company may be required to disclose Personal Data relating to U.S. Reportable Persons to the U.S. Internal Revenue Service for purposes of FATCA compliance.

6.2 We may also disclose Personal Data to delegates, professional advisors, service providers (e.g., investment managers, distributors, administrators and depositaries) regulatory bodies, auditors, technology providers and any of the respective related, associated or affiliated companies of the foregoing for the same or related purpose(s).

7. **Data Retention**

7.1 We will keep Personal Data for :

- (a) the duration of the Data Subject's relationship with the Company and afterwards in accordance with the Company's legal and regulatory obligations and any applicable record retention policy of the Company;
- (b) such period as may be deemed by us to be necessary in light of applicable statutory limitation periods; and
- (c) otherwise only for as long as the retention of such Personal Data is deemed necessary for the purposes for which that Personal Data are Processed (as described in this Privacy Policy).

8. **Data Transfers outside the UK**

8.1 From time to time, the Company may transfer Personal Data to countries outside the UK which may not have the same or equivalent Data Protection Law as the UK. If such transfer occurs, the Company will ensure that such processing of Personal Data is in compliance with applicable Data Protection Law and, in particular, that appropriate measures are in place such as relying on adequacy decisions or entering into Standard Contractual Clauses for data transfers.

9. **Further Information/Complaints Procedure**

- 9.1 Further information about this Privacy Policy and/or the Processing of Personal Data by or on behalf of the Company may be made available to Data Subjects being borrowers or related persons under the Greek receivables owned by the Company if necessary by addressing their request in writing to the Servicer's Retail Business Planning and Customer Excellence Retail Banking at 6 Siniosoglou Str. 14234, Nea Ionia, Greece or via email at info@eurobank.gr. While Data Subjects may make a complaint in respect of compliance with Data Protection Law directly to the Information Commissioner's Office, Data Subjects being borrowers or related persons under the credit card receivables owned by the Company are requested to contact the Servicer's Retail Business Planning and Customer Excellence Retail Banking at 6 Siniosoglou Str. 14234, Nea Ionia, Greece or via email at info@eurobank.gr in the first instance to give us the opportunity to address any concerns that they may have.

Annex I

Glossary

In this Privacy Policy, the terms below have the following meaning:

“**Data Controller**” means the entity which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

“**Data Processor**” means the party that Processes Personal Data on behalf of the Data Controller.

“**Data Protection Law**” means (i) up to and including 31 December 2020, the General Data Protection Regulation (No 2016/679) (“**GDPR**”); and (ii) from and including 1 January 2021, the UK GDPR as retained EU law (as defined in the European Union (Withdrawal) Act 2018), the UK Data Protection Act 2018 and any other laws which apply to the Company in relation to the Processing of Personal Data from time to time.

“**Personal Data**” is any information relating to a living individual which allows the identification of that individual. Personal Data can include:

- a name, an identification number;
- details about an individual’s location; or
- any other information that is specific to that individual.

“**Processing**” means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. “**Process**” and “**Processing**” are interpreted accordingly.

Annex II

Types of Personal Data

Categories of Data Subject	Type of Personal Data
1. Borrowers and related persons	Name, mailing and residential addresses, email address, telephone number, beneficiary name, nationality, date of birth, account number, bank account details, tax identification number, etc.
2. Directors and other individuals within the Company.	Name, mailing and residential addresses, email address, telephone number, date of birth, nationality, etc.
3. Employees of the Company's service providers.	Name, mailing address, email address and telephone number, etc.