

CAC Coral Limited

Data Protection Notification

1. Introduction

CAC Coral Limited (the “**Company**”) is incorporated in accordance with the provisions of the Companies Law Cap. 113 with registration number HE387010 and authorised by the Central Bank of Cyprus (CBC) to operate as a Credit Acquiring Company under the provisions of the Sale of Credit Facilities and other Related Matters Law of 2015 (Law 169 (I)/2015) as amended.

This Privacy Policy sets out information on how we collect and process personal data in accordance with the Data Protection Laws which include but not limited to, General Data Protection Regulation 2016/679 (GDPR) and Cyprus Data Protection Law 125(I)/2018. Pursuant to the Data Protection Commissioner, the sale of credit facilities is justified under, inter alia, art. 6(1)(f) GDPR.

CAC Coral Ltd is the controller of your personal data which determines the purpose and how the personal data are used. The Company is committed to protect ‘Data Subject’ privacy and handling of personal data in line with the Laws.

‘**Personal Data**’ is any information relating to an identified or identifiable natural person (‘**Data Subject**’) who can be distinguished, directly or indirectly, by reference such as a name, an identification number, date of birth, telephone number, email address or other combined information and specific factors.

For further information you may contact us at dpo@caccoral.com.cy .

2. Categories of personal data processed and collection sources

CAC Coral Ltd or our agents collect and process personal data received by your preceding credit institution or directly from you or of lawful collection from third parties such as your authorised representatives, credit reference or fraud prevention agencies, Artemis Data Registries, public authorities such as the Land Registry, Registrar of Companies and Official Receiver, bankruptcy archives.

The Company collects and processes personal data on:

- Borrowers and/or guarantors and/or their representatives. Data previously provided to the former financial institution, which mainly include name, address and contact details, date of birth, nationality, marital status, details about dependants, financial information, tax information, property ownership, property evaluation data, securities, insurance data, employment history, data collected from publicly available sources and any other provided information.

- Special categories of data from the collection of data provided to your preceding credit institution on health information that could lead to financial status impact, such as illness, disease, disabilities and other sensitive information.
- Data collected by third party sources relating to assets management services, credit services agencies, asset and residency tracing or obtained under regulatory obligations such as the anti-money laundering and counter terrorist financing laws such as criminal records, convictions and background checks, any sanctions or adverse media, high profile status as a politically exposed person.

3. Legal basis for processing personal data

CAC Coral Ltd process your personal data on at least one or more legal basis under the General Data Protection Regulation 2016/679 (GDPR):

A. Performance of a contract

We process personal data in order to perform our duties and meet our obligations to you pursuant to your mortgage loan agreement and to exercise our rights under our contracts with you..

B. Compliance with a legal obligation

There are a number of legal obligations emanating from the relevant laws to which we are subject as well as statutory requirements, e.g. the Arrears Directive, anti-money lender and counter-terrorist financing directives and laws and tax laws. There are also various supervisory authorities to whose laws and regulations we are subject e.g. the tax authorities, the Central Bank of Cyprus, the Unit for Combatting Money-Laundering (MOKAS). Such obligations and requirements impose on us necessary personal data processing activities for credit checks, identity verification, compliance with court orders, tax law or other reporting obligations and anti-money laundering controls. These activities may include;

- The credit acquiring company business, tax and regulatory obligations, including its related reporting obligations, the management of its credit and mortgage loans, loan reporting obligations to the Central Bank of Cyprus and credit history reporting to Artemis and other related obligations imposed upon the Company.
- To assist the Company's auditors in the auditing of Company in accordance with its legal obligations.

- We are required to carry out certain checks, including checks related to political affiliations, financial sanctions, and previous criminal allegations or convictions. This may require us to process information about criminal convictions and offences. This processing is necessary in order for us to manage the loan agreement with you in accordance with our legal obligations.
- To investigate, detect, prevent or prosecute crimes in relation to the prevention of fraud, money laundering, market abuse and/or terrorist financing, including "know your customer" and other necessary on boarding and ongoing customer checks as well as potentially reporting relevant information to the money laundering and fraud prevention authorities as required.

C. Purposes of safeguarding legitimate interests

We may process personal data so as to safeguard the legitimate interests pursued by us or by a third party. A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you.

Examples of such processing activities include:

- Initiating legal claims and preparing our defence in litigation procedures,
- Means and processes we undertake to provide for the Company's IT and system security, preventing potential crime, asset security, admittance controls and anti-trespassing measures,
- Measures to manage business,
- Sharing information with purchasers and potential purchasers,
- The transfer, assignment and/or sale of loans or assets held by the Company.

D. Provided your consent

In order to manage and administer your (or the legal or natural persons for whom you are an authorised representative/agent or beneficial owner) loan or security or guarantee effectively we may need to meet specific requests or proposals in support of which you provide health related data in accordance with the Code of Conduct for Handling Borrowers in Financial Difficulties and any other relevant current or future regulations and guidance. Provided that you have given National Bank of Greece (Cyprus) Limited your explicit consent for processing then the lawfulness of some of our processing may be based on that consent, which has passed to the Company as loan owner. You have the right to revoke consent at any time. However, any processing of personal data prior to the receipt of your revocation will not be affected.

Please note that you have a right to object to the processing of your Personal Data where that processing is carried out for our legitimate interests or to withdraw your consent, should we rely upon your consent for processing the special categories of data specified above.

If you do not provide, or if you withdraw your consent for processing special categories of Personal Data, as specified above, we may not be able to manage and administer your loan (or that of the legal or natural persons for whom you are an authorised representative/agent or beneficial owner), security or guarantee and provide you with the services you require, or meet your specific requests. This is particularly relevant in relation to requests for forbearance, for which additional Personal Data may be requested. In all instances in which we request your personal information, we will, where applicable, identify if there is a statutory reason for requesting such information and we will explain the consequences for you if you do not provide it.

4. Sharing of Personal Data

Pursuant to our contractual and statutory obligations your personal data may be provided to relevant service providers and/or other third parties including other companies for the purpose of undertaking our obligations, under a contractual agreement with applicability to confidentiality and data protection as according to the Cyprus Data Protection Law and GDPR, such as:

- Servicers and advisers
- CAC Coral group companies
- Supervisory and other regulatory and public authorities, for example the Central Bank of Cyprus, tax authorities, criminal prosecution authorities, the Unit for Combatting Money-Laundering (MOKAS)
- Credit and financial institutions such as correspondent banks and the European Investment Fund
- The bank(s) through which your payments are processed
- Valuers and surveyors
- Legal advisors
- Corporate administrators including the company secretary
- Appointed receivers/managers
- Asset trace investigators
- Estate agents
- Potential purchasers and purchasers of assets or loans
- Debt collection agencies
- Credit reference agencies (ARTEMIS)
- Auditors and accountants
- Marketing companies and market research companies
- Fraud prevention agencies

- File storage companies, archiving and/or records management companies, cloud storage companies
- Purchasing and procurement and website agencies

5. Transfer of personal data to a third country or to an international organisation

The disclosure of your Personal Data to the third-party recipients set out above may involve the transfer of data to the USA, and other jurisdictions outside the European Economic Area ("EEA"), which are not the subject of an adequacy decision by the EU Commission. Such countries may not be subject to equivalent data protection laws as countries within the EEA. Any transfer of your Personal Data to jurisdictions outside the EEA may only occur in accordance with the requirements of the GDPR and the Cyprus Data Protection Law.

6. Automated decision-making and profiling

The Company generally does not use any automated decision-making. We may process some of your data automatically, with the goal of assessing certain personal aspects (profiling), in order to enter into or perform a contract with you, where data assessments (including on payment transactions) are carried out in the context of combating money laundering and fraud.

7. Retention of Data

CAC Coral Ltd will only process your data for the purposes described in this Policy in accordance with the applicable laws and guidelines issued by the Data Protection Commissioner's Office. The Company will securely delete or destroy the data 10 years after the end of the business relationship.

8. Your Data Subject Rights

- In accordance with the General Data Protection Regulation 2016/679 (GDPR) you have the following rights and to raise a request please contact us at dpo@caccoral.com.cy
- Access Right Request to your personal data, the right to be informed of your personal data.
- Request to rectify your personal data to enable you to have any incomplete or inaccurate data we hold about you corrected.
- Request for the erasure of personal data (the 'right to be forgotten') where there is no substantial reason for processing.
- Request to object processing of your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms.
- Request the restriction of processing of your personal data where the use:
 - is not accurate;
 - it has been used unlawfully but you do not wish for us to delete it;
 - it is not relevant any more, but you want us to keep it for use in possible legal claims;
 - you have already asked us to stop using your personal data but you are waiting us to confirm if we have legitimate grounds to use your data.

-Right to lodge a complaint with the Supervisory Authority which is the Data Protection Commissioner.

9. Updates to this privacy statement

This Policy may be modify or amend this privacy statement from time to time where significant changes have been made regarding the processing of personal data .

If you have any questions, or want more details about how we use your personal information, you can contact us at dpo@caccoral.com.cy .