

PRIVACY NOTICE CONCERNING PERSONAL DATA PROCESSING AND PROTECTION

While conducting its business, **B2KAPITAL FINANCE IFN S.A.** processes your personal data.

Data controller:	B2KAPITAL FINANCE IFN S.A. – a non-banking financial institution, registered with National Bank of Romania, within General Registry of Non-banking Financial Institutions under number RG-PJR-41-110337/02.08.2018, as an entity conducting professional lending operations under the Law 93/2009 and NBR Regulation 20/2009 on Non-banking Financial Institutions: consumer loans, housing loans, micro-lending, financing of commercial transactions, factoring, financial leasing, issuance of guarantees.
Correspondence office:	Bucharest, no. 4 Vasile Alecsandri street, (Landmark), Building C, 2 nd floor, District 1.
Trade Register:	J40/59/2018
Fiscal Code:	RO38651006
Email:	office@b2kapitalifn.ro
Phone:	+40 374 885 604
Data Protection Officer (DPO)	dpo@b2kapitalifn.ro Phone: +40758237563

Protecting your personal data is very important to us. To do this, we undertake to provide all due diligence to ensure compliance with the legal requirements for the protection of personal data, in particular the requirements provided by **General Data Protection Regulation EU 2016/679 (GDPR)**.

Based on this privacy notice, we help you to understand how we collect your personal data, what kind of personal data we process, why are we processing them, how we use and store them, whom we disclose them and why, as well as the rights that you have and how you can exercise them.

What is personal data?

Personal data is any information relating to an identified or identifiable natural person, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. A person can be identified if additional information can be obtained without excessive effort to perform the identification.

Who owns the personal data we process?

B2Kapital Finance IFN processes personal data of the individuals who are or are going to be in a contractual relationship. These categories of individuals may include B2Kapital Finance IFN customers, credit products beneficiaries, customers' legal and/or conventional agents as well as the persons whose data are provided by customers during the contractual relationship, in which case the requests to inform the specific data subjects regarding the information transmission to B2Kapital Finance IFN must be carried out by the person who provided this information.

How do we collect your personal data?

B2Kapital Finance IFN may collect your data from:

- ❖ The company that granted you the credit, in particular ALPHA BANK ROMANIA S.A., as the initial data controller, on the basis of the Assignment Agreement concluded between ALPHA BANK ROMANIA S.A. as Assignee and B2 Kapital Finance IFN as Assignor.
- ❖ Directly from you, or in certain cases, from other persons justifying a legitimate interest in connection to the loan agreement.
- ❖ Persons empowered to communicate with us on your behalf, or persons submitting payments in your name.
- ❖ In addition, B2Kapital Finance IFN can obtain the above data by consulting external sources (in order to fulfil its legal obligations regarding know your customer for preventing money laundering and terrorism financing, or with regard to the indebtedness ratio assessment). By external sources we understand: public institutions and authorities, public registries, data bases, information available in social media and internet, or authorized third-parties who possess such information. For example: Directorate for Persons Evidence and Database Administration, the National Trade Register Office, the portal of courts in Romania administered by the Ministry of Justice, National Agency for Fiscal Administration, Cadaster and Real Estate Register Offices, third-party authorized to maintain databases of persons accused of terrorism or politically exposed, etc.
- ❖ Public institutions and authorities or other persons or entities which perform a service of public interest (such as: bailiffs, public notaries).

What personal data do we process?

Your personal data that we are processing may include:

- ❖ Identification data such as: name, surname, personal identification number (CNP/PIN) or other unique identification number (TIN / SSN, etc.), birthdate, nationality, serial number and identity card number or passport / driving license, as the case may be, the data mentioned in identity papers, place of birth, address of domicile or residence.
- ❖ Contact information such as: correspondence address; phone number (fix/mobile/fax); email address.
- ❖ Signature and ID photography

- ❖ Data about your personal, financial and / or professional status, such as: occupation / profession; the nature of own activity; public function held and / or political exposure; employer's name; income; nature of income; source / sources of income; the number of the pension file; the bank account; data on real estate and mobile assets you own; civil status, number of children; existing debit information (e.g., type of debit, amount, interest, lender, currency, costs); information on the debt collection situation (e.g. repayment schedule, payroll status, balance sheet); other information.
- ❖ Information on fraudulent / potentially fraudulent activity, consisting of data on convictions related to offenses such as fraud, money laundering and terrorist financing.
- ❖ Data on administrative or judicial proceedings in which you are involved, to the extent that they are related to the credit agreement managed by B2Kapital Finance IFN and / or which may influence credit repayment terms (e.g. forced execution, judicial liquidation, bankruptcy; reorganization, intervention in other legal proceedings, establishing, exercising or defending our rights in court).
- ❖ Data resulting from CCTV video recording, in case you visit the B2Kapital Finance IFN locations, to the extent of the applicable legal provisions;
- ❖ Data resulting from audio recording (voice) if you access our dedicated contact numbers for call-center services;
- ❖ Data of individuals who are party to the credit agreement administered by B2Kapital Finance IFN (e.g. coders, guarantors, heirs);
- ❖ Data of individuals who are party to the loan agreement managed by B2Kapital Finance IFN (e.g. codebtors, guarantors, heirs).
- ❖ Data resulting from the evidence of interactions that occur via correspondence or communications between you and B2Kapital Finance IFN in connection with the process of credit management and / or recovery of related claims, so that we can fulfill the legal obligation established in our task by applicable legislation, including consumer protection.
- ❖ The personal data you have provided to us so that we can provide you with credit restructuring and reimbursement solutions that take into account your individual circumstances, your interests and rights and your ability to repay and, at the same time, to meet our legal obligations including consumer protection.
- ❖ Other personal data mentioned or included in the credit agreement and / or in the documentation of the credit file provided by the initial creditor.
- ❖ Other information that is resulting from the processing of personal data and is necessary to carry out the activity for the purposes mentioned below, such as: segmentation of the client portfolio; the unique identifier allocated to B2Kapital Finance IFN for each client, information on the type of financing products and how they are used.

What purposes are we processing your personal data for?

B2Kapital Finance IFN processes your personal data to the extent that these data relate to the management activity of your loans and in connection with establishing, exercising or defending our rights in court, in principle pursuing:

- ❖ **Identification of individuals and verification of personal data**
- ❖ **Evaluation of the credit repayment capacity and the claim management**
- ❖ **Internal and external reporting**
- ❖ **Improvement and development of our products and services**
- ❖ **Activities regarding information and documents classification, management and archiving.**

In this context, the purposes for which we process your data include:

- ❖ The appropriate identification of the data subjects both in the B2Kapital Finance IFN locations, and through means of communication (e.g. phone, e-mail, post, internet).
- ❖ Verifying clients and other related data subjects, in order to identify, prevent and combat money laundering, terrorism financing and fraud; to carry out know your customer requirements and to monitor the activity of B2Kapital Finance IFN clients in order to detect suspicious activities or transactions, as required by the applicable legislation in the field of prevention and combating money laundering and terrorist financing.
- ❖ Analyzing and evaluating the loan reimbursement capacity of our clients, in order to decide on certain lending operations, in particular the analysis of the risk exposure following the entrance or contractual relationship continuity.
- ❖ Analysis of your financial situation and sources of income so that we can identify the best solutions for loan repayment and the evaluation of your financial and commercial behavior during the relationship with B2Kapital Finance IFN; administration of overdue receivables; performing debt collection and / or debt recovery activities or managing such activities, and, if necessary, performing the legal proceedings necessary for recovery and collection of debts (e.g. legal enforcement, insolvency, intervention in other legal proceedings; exercising or defending our rights in court), including identifying solutions that are favorable to both parties and leading to closure of outstanding debts.
- ❖ Conducting communication with you, including through electronic means in order to inform or notify you about the financing products managed by B2Kapital Finance IFN (e.g.: expiration, non-fulfillment of obligations, modification / new features / costs / functionalities / benefits).
- ❖ Provide support services at your requests, including through the means of electronic communication (e.g. telephone, SMS, e-mail, post). For example, additional information on B2Kapital Finance IFN products, updating some of your identification data, performing checks on the malfunctions of the products and services offered, solving your requests and petitions).
- ❖ Settlement of litigation, investigations or any other petitions / complaints / requests in which B2Kapital Finance IFN is a party or has a legitimate interest.
- ❖ Performing economic, financial and / or administrative management activities within B2Kapital Finance IFN
- ❖ Running and managing internal activities related to risk management, physical security and information security, business continuity and disaster recovery, as well as performing risk controls on B2Kapital Finance IFN procedures and processes, or internal/external audits.
- ❖ Generate reports on the B2Kapital Finance IFN activity in order to facilitate the operational management of all operational and financial processes, as well as to analyze the performance of the institution.

- ❖ Centralize operations and maintain internal databases to store information about the data subjects, so that they can be used by our departments and structures within B2Kapital Finance IFN in their work.
- ❖ Performing internal analysis (including statistical analysis), both on the services provided by B2Kapital Finance IFN and on the client portfolio, for improving and developing the activity and services, defining and reviewing internal policies and practices, as well as for identifying solutions to streamline risk management or developing models to streamline operational processes and activity, including by conducting financial analysis on costs, budget and profitability of B2Kapital Finance IFN.
- ❖ Preparing reports on the B2Kapital Finance IFN activity required for consolidated reporting at Group level where B2Kapital Finance IFN is a member.
- ❖ For reporting purposes to the competent authorities, according to the applicable legal regulations (e.g. reporting of statistical data and other statutory reports to the NBR, reports provided to the National Office for Preventing and Combating Money Laundering, reporting on the financial statements to the Ministry of Finance and ANAF, other regulated reports, provided in the specific and / or general legislation).
- ❖ To carry out the activities regarding documents classification, management and archiving in physical and / or electronic format, conducting the correspondence registration services addressed and / or sent by B2Kapital Finance IFN, as well carrying out the courier activities.
- ❖ To respond to the requests of public authorities or to meet the applicable legal requirements.

Which is the legal ground for processing your personal data?

- ❖ **Processing your personal data is required to execute a contract in which you are a party or to take steps at your request before concluding a contract:**
 - Execution of the credit agreement in which you are part of, as Client and / or as data subject, is the source of the contractual relationship between you and B2Kapital Finance IFN as a creditor;
 - Conducting pre-contractual diligences at your request to conclude a loan agreement (for example, but not limited to performing preliminary analysis to assess and solve your requests or to perform preliminary analysis of the evaluation and acceptance of rescheduling requests, granting a grace to pay, etc.).
- ❖ **The processing of your personal data is necessary for the legal obligation fulfillment or to serve a public interest:**
 - Ensuring compliance with consumer protection legislation; civil law; tax and accounting legislation, customer knowledge on preventing and combating money laundering and terrorist financing; legislation on the guarding of objectives, goods, values and protection of individuals; the specific legal regulations applicable to the activity of B2Kapital Finance IFN issued by the National Bank of Romania and by other competent authorities with control and supervisory responsibilities;
 - Respecting the requirements of public interest, especially from the perspective of adequate risk management entering into contractual relationships with politically exposed persons, according to the legal provisions applicable in the field of prevention and combating money laundering and terrorist financing.

- ❖ **The processing of your personal data is necessary for the legitimate interests** pursued by B2Kapital Finance IFN SA which may concern:
 - Managing the institution's activity in terms of efficiency, profitability and safety for all interested parties and assessing the opportunity to enter into a contractual relationship and / or to maintain an existing one (for example: centralizing operations and managing the client portfolio by preparing internal analysis, including statistical analysis of the client portfolio and on the efficiency of the activity; conducting the necessary activities for identifying, analyzing, evaluating and mitigating the risks to which the institution may be exposed, including financial risks and / or reputation risk, business strategy planning and development, development and improvement of credit and risk management methodologies).
 - Preventing fraud, potential conflicts of interest and protecting the assets of the institution, as well as ensuring a high level of security, both in terms of physical security and systems and applications (systems, applications, network, IT infrastructure).
 - Establishment, exercise and defense of legal rights in court.
- ❖ **In case you gave your consent for processing your personal data for one or more specific purposes** (e.g. for direct marketing activities, if applicable).
- ❖ **Processing is necessary to protect your vital interests or other individuals:** in absolutely exceptional situations, in case of emergencies, fortuitous cases or force majeure, your personal data can be processed to protect vital interests of you or other individuals.

How do we process your personal data?

Personal data processing means performing operations such as: collecting, registering, organizing, structuring, storing, modifying / updating, retrieving, consulting, using, transmitting, aligning, disclosing, sharing, restricting, deleting, destroying, archiving personal data and so on.

The data will be processed and stored both on paper and electronically in the B2Kapital Finance IFN credit management system and in other IT systems and IT support applications (including e-mail, Office suite) used at the institution level.

In order to achieve the stated goals:

- ❖ We use tools that are not fully automated (human intervention is needed), for establishing the profile / evaluation / forecasting of the reimbursement capacity. This profiling is made on the basis of the information you have provided directly to us or made available to us by the initial creditor as well as based on the information obtained from free public sources (Internet / social networks / public databases / publications and official information issued by public authorities / official databases on entities and persons subject to international sanctions). Due to these profiles, we can decide the loan repayment advantageous solutions for both parties, especially if it is necessary to implement restructuring measures and / or to perform some recovery and debt collection activities or initiating court proceedings.
- ❖ We use software applications and systems on the basis of which we can provide efficient management of loan portfolio, proper management and accounting of payments and revenues, as well as legal reporting.

- ❖ We use internal mechanisms and procedures to help us to prevent and properly manage conflicts of interest, and, in order to comply with the data accuracy principle, we make every effort to permanently update your personal data and to verify and confirm the data we hold about you on the basis of information obtained from official sources (e.g. the Trade Registry, the portal of courts, publications and official information of public interest issued by public authorities, bailiffs) or from public or private sources (internet / social networks / public data / databases provided by contractual partners of the institution).
- ❖ We also use your data to carry out internal statistical analysis in order to analyze the efficiency and improvement of credit management activities, methodologies and associated risks.
- ❖ We process and analyze your complaints and requests to exercise your data protection rights and any other requests you address to us.
- ❖ We provide information that includes personal data to the authorized recipients in order to meet our legal reporting obligations arising from national and European regulations (e.g. obligations deriving from legislation to prevent and combat money laundering and terrorism financing, or tax and accounting legislation) as well as legal regulations and instructions issued by the Supervisory and Control Authorities (e.g. Ministry of Finance, National Bank of Romania, National Authority for Consumer Protection, National Supervisory Authority for Personal Data Processing, National Office for Prevention and Combating of Money Laundering, authorities and criminal prosecution bodies, etc.). Providing information for these purposes is mandatory.
- ❖ We inform you about the situation of your loan, your debts, as well as any data and information of interest to you regarding the loan reimbursement.
- ❖ We identify opportunities to improve our services so that we can offer you better products and solutions to meet your individual needs and situation.

Is your data safe at B2 KAPITAL FINANCE IFN?

The security of your personal data is very important to B2Kapital Finance IFN and, in this regard, the entity ensures the implementation and periodic review of technical and organizational security measures designed to protect your data against unauthorized access, alteration, disclosure or destruction. Access to your personal data is only allowed to persons authorized by B2Kapital Finance IFN, following an appropriate assessment, according to specific attributions and responsibilities, and who have previously accepted their confidentiality obligations.

If you choose to communicate with us and provide your personal information by electronic means (e-mail), we inform you that B2Kapital Finance IFN has taken all necessary precaution measures to ensure the security of electronic mail by securing its own systems.

However, please be aware that electronic communication using public networks is not fully secure and by choosing this option, you assume the risks that may arise from external sources such as interception, modification, loss, destruction, delays in data receipt, etc.

B2Kapital Finance IFN implements specific caution measures and procedures for the proper prevention, identification and management of potential personal data breaches, including measures set forth by the law

regarding notification of the National Supervisory Authority for Personal Data Processing and impacted Data Subject.

Who are the recipients of your personal data?

In the regular course of its business, B2Kapital Finance IFN may transfer your data to other individuals or entities to achieve the processing purposes already mentioned.

B2Kapital Finance IFN may transfer your personal data to:

- ❖ Your initial creditor from which B2Kapital Finance IFN has acquired the claim.
- ❖ Within the B2Holding Group, where B2Kapital Finance IFN is a member, in countries that are part of the European Economic Area, including for consolidated reporting purposes and for fulfilling legal obligations regarding transparency and publication requirements.
- ❖ B2Kapital Finance IFN will only allow the access or transfer of personal data to individuals or entities outside of the European Economic Area, under condition of adequate guarantees existence, or to countries recognized by the European Commission as having an adequate level of personal data protection.
- ❖ Our contractual partners - we can transfer some of your personal data to our partners with the aim to improve the services that we offer you.
- ❖ Underwriters of claim rights - We may transfer your personal data to other natural or legal persons to whom B2Kapital Finance IFN or the creditors we represent sell the claims.
- ❖ Competent Authorities with control and supervision responsibilities, according to the specific legal regulations applicable to the activity of B2Kapital Finance IFN (e.g. the National Bank of Romania, the National Office for Preventing and Combating Money Laundering, the National Authority for Consumer Protection, the National Supervisory Authority for Personal Data Processing, the National Agency for Fiscal Administration, etc.)
- ❖ Authorities / competent bodies - if required by a mandate, or for applying a national or European law.
- ❖ Other public authorities - to respond to legal requirements or justifying a legitimate interest (e.g. bailiffs, public notaries, courts).
- ❖ Transferring upon your request – we may encounter situations in which you require us to transfer your data to a Representative or Empowered person acting in your name and on your behalf (for example, financial consultants, lawyers, mediators, executors, company directors).
- ❖ We may disclose or transfer your personal data in the event of a reorganization, merger, sale, assignment, or other transfer of the company.
- ❖ Transfer to other third parties - We may transfer your personal data to other entities outside our Group, which are not public authorities, in compliance with the legal requirements in force, such as:
 - Our suppliers who offer us support in managing the services we provide;
 - Providers that help us improve our services, or develop, implement or manage our business systems, infrastructure, or operational processes (such as auditors, consultants, analysts, accountancy service providers, etc.)

- Suppliers that provide us maintenance and support, in order to operate for you the recovery services in optimal and safe conditions. For example: email service providers (e.g. Microsoft), vendors who develop / implement or manage IT applications and infrastructure, companies that provide archiving services, courier / postal service providers delivering you various notifications from B2Kapital Finance IFN, companies that manage the security systems implemented to ensure confidentiality / integrity and availability of your data, etc.
- Suppliers that provide us support in the process of recovery and collection of debts or in legal procedures for forced execution (e.g. but not limited to debt recovery service providers, lawyers, valuation experts, consulting firms, cadastral experts, accountants).

We also inform you that mechanisms and procedures are put in place to ensure that our suppliers and our contractual partners that have access to your personal data comply with the applicable legal requirements regarding the processing and protection of personal data.

How long do we process and store your personal data?

Your personal data will be processed by B2Kapital Finance IFN for the strictly necessary timeframe for the processing purposes, which may vary depending on the purpose of the data being used.

B2Kapital Finance IFN will process your data for the entire duration of the loan agreement and will store them for a period of 5 years after the termination of the contractual relationship, unless the law stipulates otherwise.

Data processed for accounting purposes will be stored for a maximum of 5 or 10 years, in accordance with statutory accounting regulations.

For data collected through CCTV, if you visit B2Kapital Finance IFN locations, the storage period is up to 30 days from the date of registration, with the possibility of prolongation in case of requests submitted by competent public authorities.

Personal data processed to respond to your requests will be retained for a period of 3 years after the last communication, according to the general prescription term provided by the Civil Code, in order to ensure the establishment, exercise or defense of certain rights in court.

What are your data subject rights and how can you exercise them?

You can exercise at any time the following rights, within the limits and conditions set forth by the applicable legislation in the field of personal data protection:

- ❖ **Right to be informed** – you may request at any time information and details on how we process your personal data, which will be provided to you verbally or in writing through the specifically requested channel.
- ❖ **Right of access to your data** – You may at any time request the access to your personal data held by B2Kapital Finance IFN; we will inform you on the processing of your personal data, i.e. the confirmation that

your personal data is processed or not by B2Kapital Finance IFN, the purposes, the grounds and the conditions of the processing.

- ❖ **Right to data rectification** - You can request anytime to correct your personal data, including by filling in a complementary statement, so that we can ensure that, at all times, your data is updated, accurate and precise.
- ❖ **Right to object to data processing** – for reasons related to your particular situation, you may object to the processing of your personal data based on the legitimate interest of B2Kapital Finance IFN and / or other persons we represent, or of the processing carried out in the public interest. In this case, B2Kapital Finance IFN will still be able to process your personal data only if there are legitimate and compelling reasons that justify processing and prevail over your interests, rights and freedoms as data subject, or if the purpose is to establish, exercise or defense of a right in court.
- ❖ **Right to data restriction** – You have the right to request the restriction of processing in the following situations: (i) you have challenged the accuracy of your personal data that we process, so that, for the period necessary to verify their accuracy, your data will be restricted from processing; (ii) the processing of your personal data was considered illegitimate and you objected to the deletion of the data, requesting instead the restriction of the processing; (iii) you objected to the processing of your personal data, so that during the verification of the validity of the processing grounds, your data will be restricted; (iv) although the data retention period has expired, you have expressly requested us to retain your data for establishing, exercising or defending a right in court. In case of restriction, your personal data may be processed by storage. Other processing operations will be possible only for: (i) establishing, exercising or defending a right of the B2Kapital Finance IFN in court; (ii) to protect the rights of another natural or legal person; (iii) based on your express consent or (iv) to protect a public interest. If your request for data restriction has been complied with, we will inform you accordingly, before removing the processing restriction.
- ❖ **Right to data erasure** – You may ask us to delete your personal data that we process, and we will undertake all the necessary steps to do so if: (i) it is no longer necessary to meet the purposes for which it was collected; (ii) you withdraw your consent and the processing was done on the basis of this consent, and there is no other legal basis for continuing the processing; (iii) you object the processing of the data and there are no legitimate reasons for further processing; (iv) your personal data has been processed without a valid legal basis for doing so. We also inform you that personal data for which you exercised the right to erase, may still be processed in the following situations: for the fulfilment of legal obligations stipulating the processing, as well as for establishing, exercising or defending a right in court.
- ❖ **Right to data portability** – In the case of your personal data that we are processing by automatic means, based on your express consent or for the execution of a contract between you and B2Kapital Finance IFN, you may request us to provide you such data in a structured, and automatically readable format, which you may send to another operator, or you may request us to send the data directly to that operator (to the extent that this is technically possible).
- ❖ **Right to withdraw your consent** - in cases where the processing is based on your consent, it can be withdrawn at any time. Withdrawal of your consent will have effects only for the future processing. The processing performed before the withdrawal of consent, remains valid.

Exercising your data subject rights

All these rights can be exercised by submitting an official written request in this regard. In order to meet your expectations and to facilitate the exercising of any of your rights at any time, you can find posted on our webpage a dedicated form which contains user guidance. Please fill it with your identification data and send it to the contact details listed below.

After your request receipt we will respond to you within 30 days or, if the request requires a more complex analysis, this deadline may be extended by another 60 days, in this case you will be informed accordingly and the reason for extension will also be provided.

If you are addressing your request electronically, the requested information will be provided electronically, if possible, or through another format or channel requested by you.

B2Kapital Finance IFN may request additional information to confirm your identity before we can share your personal data or act in connection with the exercising of the above rights.

We also inform you that, in justified cases, the law allows us to refuse to act according to your requests, for example if the purposes for which we process your data have not been fulfilled, and the processing is not based on your express consent, or where your claims are excessive, by their repetitive or obviously unfounded character. Even in this case, we will give you a written explanation of such a refusal.

If you are sure that your personal data is being processed incorrectly and does not comply with the legal requirements, you may file a complaint with the National Supervisory Authority for Personal Data Processing at: No. 28-30, Gheorghe Magheru Avenue, county 1, postal code 010336, Bucharest, Romania, phone: +40318059211; e-mail: anspdc@dataprotection.ro or the web page: <http://www.dataprotection.ro/>.

Data Protection Officer

dpo@b2kapitalifn.ro

Phone number: +40758237563

Sincerely yours,

B2Kapital Finance IFN S.A.