

# Privacy Notice Of Thea Artemis Financial Solutions A.E.D.A.D.P.

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1. Field of Scope	1
2. Categories & Types of Collected Data	2
3. Data Collection Points	4
4. Transfer of Data to Third Parties	4
5. Personal Data Retention Period	5
6. Legitimate Interest - Intended Purpose - Lawful Basis for Data Processing	6
7. Rights of the Data Subjects	6
8. Data Processing by Thea Artemis	7
9. Profiling	8
10. Cookies	8
11. Submission of Complaint Appeal	10
12. Amendments	10

## 1. Field of Scope

This privacy notice lays out the way Thea Artemis Financial Solutions A.E.D.A.D.P. (hereinafter referred to as “**Thea Artemis**”) collects, uses, processes, stores, manages, and protects the personal, medical, 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, medical, commercial and financial information of the Borrowers pertaining to non performing loans currently managed by Thea Artemis (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 (buyers) who participate in the disposition process of real estate property v) pertaining to Thea Artemi's website visitors (<https://www.thea-artemis.com/>) hereinafter referred to as "Website". Thea Artemis 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.

## 2. Categories & Types of Collected Data

**A. Borrowers (principal debtors and guarantors):** full name (borrower & guarantor), securities (real estate assets etc), behavioral data (payment rejection or acceptance etc), financial information (outstanding balances, solvency status), residential information, vat number, national ID number, pertinent to the case medical 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. Buyers (individual):** 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 behavior (marketing cookies)

## **Declaration Regarding The Processing of Personal Data By Thea Artemis (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)?**

Thea Artemis 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 Thea Artemis abides by the existing Greek banking law provisions and regulations.

Said management is conducted on the basis of Thea Artemis' 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, Thea Artemis may collect personal data of candidate employees who are interested in working with Thea Artemis 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.

Lastly, Thea Artemis collects within the framework of its statutory purpose (loan management services) certain special categories of Personal Data as defined in Article 9 of the GDPR (i.e. health records or doctors' notes, hospital reports, criminal records etc) with the explicit consent of the data subjects. Said data are submitted by the Borrowers and in some instances by the guarantors, in order to apply for improved settlement agreement terms regarding their outstanding amounts. 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 to which The Artemis is subject.

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 article 10 below.

### **3. Data Collection Points**

- 1) Borrowers - Guarantors – Co-Borrowers – Collaterals ‘owners -A
- 2) CVs from candidate employees -B
- 3) Bank Institution -A
- 4) Third party suppliers-service providers -C, D
- 5) Individuals (buyers) - E
- 6) Website visitors -F

#### 4. Transfer of Data to Third Parties

Thea Artemis 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 Thea Artemis that are competent and necessary for the fulfillment 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 investors, real estate providers, consulting firms, law firms, IT service providers, debt notification and negotiation companies of Law 3758/2009 etc, with which, we have entered into contractual agreements for the purpose of fulfilling our company’s statutory purpose (loan management services) in a correct and within our contractual terms framework.
- 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, unauthorised 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 Thea Artemis.
- 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. Thea Artemis’ 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.

## 5. 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 Thea Artemis described in paragraph 6 below, and until such time the limitation period of any related claims has expired. 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 until the limitation period of any related claims expires.
- 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 Thea Artemis, in hard copy and in electronic form or we shall retain them for as long as it is required until the limitation period of any related claims expires.
- Data of financial nature processed by Thea Artemis' in house AML & Compliance department, are subject to a five (5) year retention policy.
- 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 Thea Artemis' databases.

## 6. Legitimate Interest - Intended Purpose - Lawful Basis for Data Processing

Thea Artemis 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.

Thea Artemis 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.

## 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 In addition, as we require your explicit consent to process your special category data, you have the right to withdraw your consent at any time by contacting us by following the instructions below.

- These rights shall be exercised free of charge for you by sending a relevant letter to the Data Protection Officer (DPO) of Thea Artemis via e-mail to [dposupport@claytonerm.com](mailto:dposupport@claytonerm.com). 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.
- 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 [dposupport@claytonerm.com](mailto:dposupport@claytonerm.com). 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 Thea Artemis

Thea Artemis 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, unauthorised 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 organisational measures for ensuring the security of the processing. Moreover, Thea Artemis 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 authorised employees.

Indicative security measures applied by Thea Artemis are as follows:

- Thea Artemis maintains a disaster recovery unit for its servers on separate premises.
- Thea Artemis 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 Thea Artemis.
- 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. Thea Artemis does not maintain blacklists of any kind.

## 10. Cookies

What are cookies and why Thea Artemis 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.
- Which cookies are we using? The cookies described below may be stored in the browser. You can view and manage cookies in your browser (however, mobile browsers may not offer this visibility). Of the different types of cookies available, Thea Artemis uses the following:

<p><b>Technically necessary or essential cookies</b>  AWSELB (provider: eurocookie.galilcloud.wixapps.net)  AWSELBCORS (provider: eurocookie.galilcloud.wixapps.net)  beatSessionId (provider: thea-artemis.com)  beatSessionTs (provider: thea-artemis.com)  CookieConsent (provider: thea-artemis.com)  Hs (provider: thea-artemis.com)  JSESSIONID (provider: nr-data.net)  ssr-caching (provider: thea-artemis.com)  TS# (provider: thea-artemis.com)  wixSessionTS (provider: thea-artemis.com)  XSRF-TOKEN (provider: thea-artemis.com)</p>	<p>Technically essential cookies are essential for the navigation in the Website and its proper operation. Data retention:  AWSELB – 1 day  AWSELBCORS – 1 day  beatSessionId – Persistent  beatSessionTs – Persistent  CookieConsent – 1 year  Hs – Session  JSESSIONID – Session  ssr-caching – 1 day  TS# - Session  wixSessionTS – Persistent  XSRF-TOKEN – Session</p>
<p><b>Marketing Cookies</b>  canShowPopup (provider: eurocookie.galilcloud.wixapps.net)  svSession (provider: thea-artemis.com)</p>	<p>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. Data retention:  canShowPopup – Session  svSession – 2 years</p>
<p><b>Statistics or analytical performance Cookies</b>  fedops.logger.sessionId (provider: thea-artemis.com)  uidp (provider: sitebooster.com)</p>	<p>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</p>



	<p>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. Data retention:</p> <p>fedops.logger.sessionId - Persistent uidp – 1 year</p>
<p><b>Unclassified Cookies</b> events/1/# (provider: bam.nr-data.net) showOnAllPages (provider: eurocookie.galilcloud.wixapps.net) showPopup (provider: eurocookie.galilcloud.wixapps.net)</p>	<p>Unclassified cookies are cookies that we are in the process of classifying, together with the providers of individual cookies. Data retention: events/1/# – Session showOnAllPages – Session showPopup – Session</p>

- 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 and unclassified 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 [dposupport@claytonerm.com](mailto:dposupport@claytonerm.com)
- 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 1-3, Kifisias Street, Postal Code 115 23, Athens or by e-mail ([complaints@dpa.gr](mailto: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 Thea Artemis. Thereby, we encourage the data subjects to periodically visit this site so as to be informed regarding recent information of privacy practices.