

DATA PRIVACY NOTICE

ON BEHALF OF IOGH RESIDENTIAL DAC (“IOGH”) AND ITS AFFILIATES

PURPOSE AND APPLICATION OF THIS NOTICE

If you have received a notice from Pepper Finance Corporation (Ireland) DAC trading as Pepper Asset Servicing (“Pepper”) informing you that the beneficial interest in your loan (or a loan you guarantee) has been transferred to Iogh, then this data privacy notice (“notice”) applies to you.

This notice explains how Iogh as the beneficial owner of your loan or the loan you guarantee, (“we”, “our” and “us”) collects, uses and discloses information relating to you (“personal data”), in our capacity as a controller. It also sets out your rights in relation to your personal data and who you can contact for more information.

We provide this notice in accordance with our obligations under the European Union General Data Protection Regulation (EU) 2016/679 or any applicable data protection laws, and as part of our commitment to processing personal data lawfully and transparently.

CONTACT DETAILS

If you would like to contact us regarding the processing of your personal data, you can do so as follows:

C/O Data Protection Officer
Pepper Asset Servicing,
4th Floor Two Park Place
Upper Hatch Street
Dublin 2

Please quote reference “Iogh” in any correspondence so that it receives prompt attention.

WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

We are a separate and independent controller of your personal data and are separately responsible for the personal data that we, as a controller, process.

1. PERSONAL DATA COLLECTION AND USE

We receive personal data on a periodic basis from Pepper in connection with our beneficial interest in the loan. Pepper is the legal title holder of the loan and carries out credit servicing activities in respect of the loan for Iogh (the beneficial owner). Pepper’s separate data privacy notice is available on Pepper’s website www.peppergroup.ie/data-privacy-notice and contains more information on how Pepper uses your personal data.

Iogh may also generate information ourselves (such as internal identifiers), obtain information from public sources (such as sanctions screening registers) and from third parties (such as the previous owner of the loan when we commence the process of acquiring an interest in the loan) or collect information from you directly if you choose to contact us. If you contact us and provide personal data relating to another person (e.g. a partner, spouse, co-borrower or guarantor) we rely on you to ensure that you have their consent to providing us with their personal data for use in accordance with this notice.

Iogh may also obtain your personal data from our agents or service providers acting on our behalf, from third parties

authorised to provide us with such information, such as credit reporting bodies, other credit providers or other agencies used for running due diligence checks, authorised third parties performing identity verification procedures on our behalf and/or from third parties who provide services to you such as your financial adviser, accountant or lawyer.

The personal data we may process primarily includes:

A. IDENTITY INFORMATION AND ADDRESS

Identity information (such as your name, date of birth, gender, internally-generated ID numbers) and proof of identification. We may also process your address and, if provided to us, other contact information.

B. FINANCIAL / LOAN INFORMATION

Information pertaining to you and the loan which is provided to us by Pepper or other third parties such as the previous owner of the loan, in particular loan identification number (such as loan ID), type of loan (for example, ‘residential’), original and current interest rates, loan balances and information relating to loan repayments. This may include financial information such as your bank account details, financial standing and history, credit rating, job title, tax-related information, personal insolvency information about you, court proceedings information related to you and codes and information concerning payment history where this is provided to us.

C. BUSINESS RECORDS

Copies, notes and records relating to any correspondence and communications with or relating to you, such as copies of letters between us if you contact us. Personal data we add to records associated with you and business records relating to our financial interest in, or exposure to, the loan and compliance with relevant legal, regulatory, compliance obligation and prudential practices. For example, records of the status, outcome and/or details of any checks, reports or disclosures we need to carry out or generate in connection with our regulatory, legal and compliance obligations and risk management requirements.

We make every effort to ensure that your personal data is accurate, complete and up to date. You can help us considerably in this regard by promptly notifying us if there are any changes to your personal data.

2. PURPOSES FOR COLLECTING AND USING YOUR PERSONAL DATA

We will only collect your personal data for a specific purpose and will only use your personal data for achieving that purpose and related purposes. We are not engaged in the provision of credit servicing activities so will not process your personal data for purposes relating to the provision of credit servicing activities for any loan.

In particular, depending on our interest in the loan and whether you are a borrower or a guarantor, we may process your personal data for the following purposes and for compatible purposes:

A. **MANAGING AND IMPROVING OUR BUSINESS OPERATIONS AND PRACTICES**

This includes maintaining and improving internal business processes, practices, strategy and information technology, testing new systems and upgrading existing systems, carrying out internal functions such as preparing business reports and accounts, ensuring business continuity and disaster recovery and responding to information technology and business incidents, ensuring adequate network and information security, keeping appropriate records and responding to any correspondence from you (including verifying your identity). To the extent allowed by law, this may include recording telephone conversations and monitoring emails.

B. **MANAGING OUR INTERESTS AND RISK AND PROTECTING OUR RIGHTS**

This includes assessing, monitoring and managing financial, reputational and other risk, conducting audits of our businesses, dealing with our regulator(s), protecting our businesses, clients, staff, systems and the data we use and safeguarding our rights and defending against legal claims.

C. **MEETING LEGAL, REGULATORY AND COMPLIANCE OBLIGATIONS AND PREVENTING FINANCIAL CRIME**

This includes performing compliance checks on an ongoing basis, including credit, money laundering, sanctions compliance, due diligence and conflict checks for the purposes of fraud, money-laundering, financial crime prevention and tax identification law; tracking loan balances and payments, completing any related reports, meeting regulatory and prudential record-keeping obligations, reporting and making disclosures to, and complying with requests from public authorities, regulators, tax authorities, governmental bodies or law enforcement agencies and investigating and preventing fraud and other crime. We may also process your personal data for other purposes notified to you from time to time.

3. **REASON(S) (LEGAL BASE(S)) FOR COLLECTING AND USING YOUR PERSONAL DATA**

We will ensure that we have a valid lawful basis to support our processing of your personal data. As this will depend on the specific context in which the processing takes place, we have listed them below:

- A. *Legal Obligation*: where it is necessary to process your personal data in order to comply with legal obligations under certain laws – for example where we carry out certain compliance checks and make certain regulatory disclosures as referred to in section 2 above;
- B. *Legitimate Interests*: where it is necessary for the purposes of our legitimate interest in managing and protecting our assets and the legitimate interests of third parties such as Pepper or regulatory bodies who may require access to your personal data in order to fulfil their respective

functions. Where your personal data is processed on this basis, we ensure that there is a fair balance between these legitimate interests (as described below) and your rights.

The “legitimate interests” are:

- the processing purposes described in A – C of section 2 of this notice. This includes where the processing is not strictly essential to comply with legal obligations but where we nonetheless believe is appropriate and desirable in the context of the purposes described in section 2 A - C;
- working with regulators to meet their requirements and complying with relevant regulatory and legal obligations globally; and
- exercising our fundamental rights and freedoms, including the freedom to conduct a business and the right to property.

- C. *Consent*: in limited circumstances and to the extent the legal bases for processing set out above do not apply, your personal data may be processed in line with any consent which may have been provided by you from you from time to time.

4. **SENSITIVE PERSONAL DATA**

We may collect and use personal data relating to criminal convictions and offences as required or authorised by applicable law. For example, data relating to actual or alleged criminal convictions and offences as part of checks and ongoing monitoring for compliance with anti-money laundering and sanctions regimes. We will not collect other special categories of personal data (e.g. health, race, ethnicity, sex life) unless you explicitly choose to give it to us or where it is necessary for us to process it in order to establish, exercise or defend legal claims.

5. **SHARING PERSONAL DATA**

Depending on our interest in or exposure to the loan and whether you are a borrower or guarantor, we share your personal data as necessary for the purposes in section 2 of this notice. In particular, we may share personal data with:

- A. affiliates, insurers, financiers/funders (and their affiliates) and co-funders and co-investors, business partners, Pepper, previous lender /owner(s) of, or parties with an interest in the loan;
- B. specialised payment networks, companies or institutions such as SWIFT;
- C. service providers and suppliers of IT systems, technology and support, including due diligence providers and administrators and managers of any securitization transaction connected to the loan;

- D. lawyers, auditors, valuers, accountants, advisers, consultants and others acting on our behalf or providing professional advice;
- E. judicial bodies, rating agencies, and relevant governmental, regulatory, supervisory, law enforcement, prosecuting, tax or similar authority or industry body under applicable laws or regulations of any relevant jurisdiction;
- F. with prospective purchasers and assignees in the event our business or group, or any part thereof, is sold or re-organised or in the event that the loan is sold, transferred or assigned in whole or in part;
- G. any other person or entity customary, necessary or advisable for the processing purposes described in this notice or to whom we are obliged by applicable law or regulation to make the disclosure; and
- H. to any other party, where you have given your consent to do so.

6. INTERNATIONAL TRANSFER

We implement appropriate safety measures to protect your personal data and transfer your personal data in compliance with applicable data protection laws. Where required by applicable data protection laws, we make sure that recipients of your personal data are subject to standard contractual clauses approved by the European Commission or other supervisory authority with the relevant jurisdiction. You can obtain more information on the mechanisms we use to lawfully transfer your personal information outside the EEA by contacting us through the contact details on page 1 of this notice. You can also find the contractual terms currently approved by the European Commission for transferring personal information outside of the EEA at: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en

The data sharing listed in this notice may involve the transfer of personal data to any country in which Iogh or an affiliate of Iogh conducts business or has a service provider (such as countries including the United Kingdom, the United States, China, Hong Kong, India, Japan, Singapore) and other countries whose data privacy laws are not as strict as those in effect in the European Union or the United Kingdom.

7. YOUR RIGHTS

You have the following rights in respect of your personal data:

- A. **INFORMATION AND ACCESS:** You have the right to be provided with certain information about our use and collection of your personal data and access to that data

(subject to exceptions provided for in applicable law).

- B. **CHANGES TO YOUR INFORMATION:** You have the right to request that any inaccurate or incomplete personal data is updated or corrected.
- C. **DELETION:** You have the right to require that your data be deleted in certain circumstances, including where it is no longer necessary for us to use this data.
- D. **DATA PORTABILITY:** Where your personal data is processed on the basis of your consent, or where such processing is necessary in connection with a contract to which you are a party, you may have the right to have the data transferred to you or another controller in a structured, commonly used and machine-readable format, where this is technically feasible.
- E. **RIGHT TO OBJECT TO CERTAIN DATA COLLECTION AND USE:** Where your personal data is processed for a legitimate interest described in this notice, we must ensure there is a fair balance between these legitimate interests and your fundamental rights and freedoms. If you disagree with your personal data being processed in this manner you have the right to object to such use.
- F. **RIGHT TO RESTRICT THE COLLECTION AND USE OF YOUR PERSONAL DATA:** You have the right to restrict processing of your personal data in certain circumstances, including while your request for data rectification or objection to personal data processing is being considered, if we no longer need to use your data but you need that data in connection with a legal claim. If this right applies, we will continue to store your data but will only further process it with your consent, for the establishment, exercise or defence of legal claims, to protect the rights of another person, or for reasons of important public interest.
- G. **RIGHT TO WITHDRAW CONSENT:** If we require your consent to process any of your personal data, this will be requested from you separately. To the extent that we rely upon your consent to process your personal data, you have the right your consent to such processing at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent prior to its withdrawal.
- H. **COMPLAINT:** You have the right to lodge a complaint with a data protection supervisory authority, in particular in your country of residence. The contact details for Iogh's data protection supervisory authority, the Data Protection Commission are

available on the website
www.dataprotection.ie.

If you wish to exercise any of these rights, you may do so by contacting us using the contact details set out on page 1 of this notice.

Where you are requesting further information and/or access we may need to verify your identity.

8. KEEPING PERSONAL DATA

We retain personal data for varying periods of time in order to assist us in complying with legal and regulatory obligations, to enable compliance with any requests made by regulators or other relevant authorities and agencies; to enable establishment exercise and defence of legal rights and claims; and for other legitimate business reasons.

Iogh retains your personal data for the period of time required for the purposes for which it was collected, any compatible and lawful purposes subsequently established, any new purposes to which you subsequently consent or to comply with legal and regulatory requirements and our policy requirements.

9. UPDATES TO THIS NOTICE

The information in this notice may change from time to time – for example, the types of personal data that we collect, the reasons for which it is used and the ways in which it is shared may change. Any material changes to the processing of personal data described in this notice which affects you will be communicated to you through an appropriate channel.

