



Shoreline Residential DAC

Data Privacy Notice

How we protect and manage your data

Data Privacy

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1. Introduction

This Privacy Notice is issued by Shoreline Residential DAC (“Shoreline”) and the beneficial owner of your mortgage (see point 11 below) who act as joint controllers of your personal data (together “we”, “our”)

The purpose of this Data Privacy Notice is to explain how we, in our capacity as a data controller, collect and use your personal information. Personal information means information relating to a living individual who can be identified (either from that information itself or when combined with other information).

2. Why Shoreline collects and uses your personal information

We collect and process your personal information for a variety of reasons and we rely on a number of legal bases for doing so including:

2.1 To enter into and for the performance of a contract

We process your personal information where it is necessary to enter into a contract with you for the provision of a product or service, to assess you for suitability for a product or service or to perform our obligations under a contract with you. This includes:

- Ongoing Product/Service Management: In order to manage any product or service provided, we have to process your personal information, for example, administration of a mortgage loan by processing payments, writing to you about the status of your loan, assessing your loan for an alternative repayment arrangement if you find yourself in financial difficulty and so on. As part of this management, we may be required to pass some of your personal information to an intermediary or counterparty (e.g. to take a payment by direct debit from your bank account we have to share your personal information with our bank).
- Continuing Performance: Where we may have acquired your loan from another lender, they will pass relevant information to us to allow for the continued performance of your contract.

2.2 To comply with legal obligations

In certain circumstances, we must process your personal information to comply with legal obligations. These include:

- Assessing affordability and suitability for the provision of credit and throughout our relationship with you including analysing your credit data for regulatory reporting.
- Obtaining personal information from the Central Credit Register and Irish Credit Bureau when providing information to the Central Credit Register about the performance of your loan agreement with us.
- Verifying personal information provided to us to prevent money laundering, financing of terrorism, tax avoidance, and/or fraud. For example, we may ask you for a proof of identity and/or a proof of address as part of our ongoing verification requirements in respect of Anti-Money Laundering legislation.
- Responding to queries raised by regulatory authorities, law enforcement and/or other government agencies such as the Data Protection Commission, the Central Bank of Ireland, An Garda Síochána, and the Revenue.
- Providing information requested in the context of a regulatory investigation or inspection.
- Delivering mandatory communications as required by legislation or regulations.
- Investigating and resolving complaints.
- Managing contentious regulatory matters, investigation and litigation.

2.3 Our legitimate business interests

Your personal information will also be processed on the basis of our legitimate interests. Where it is processed on this

basis, we ensure that there is a fair balance between our legitimate interests and your privacy rights. The following are some examples of when Shoreline processes your personal information for legitimate business interests. Your personal information may not be processed in all cases and if it is, it will always be subject to measures to comply with Data Protection Law.

- To enable us to manage our relationship with you including having readily available access to your information through use of IT systems and functionality.
- To monitor, maintain and improve internal business processes, information, technology and communications that may benefit you or Shoreline.
- To ensure business continuity and disaster recovery and to respond to information technology and business incidents and emergencies.
- To ensure adequate network and information security and fraud prevention protections are in place.
- To undertake system testing, for example, prior to implementing system improvements.
- For internal analysis and reporting for the management of individual customer accounts and to make strategic decisions for our business.
- To establish, exercise and safeguard our rights which may include taking enforcement action against customers or defending complaints or claims made about us.
- To assess the quality of our customer services and to provide staff training. This includes monitoring and testing of how we manage your loan(s) and our interactions with you.
- To perform analysis on customer complaints for the purposes of preventing errors and process failures.
- To rectify negative impacts on customers as a result of process or regulatory failures.

2.4 Where you have provided consent

In some cases we rely on your consent such as:

- **Marketing Consent:** If you consented to marketing, we might use your personal information to make you aware of other products or services which we think could be of interest to you. In addition, depending on the preferences you selected at the time of your application, we might disclose your personal information to third parties and our partners whose products or services we consider could be of interest to you. All marketing communications will include a clear opt-out facility if you wish to change your marketing contact preferences.
- **Sensitive Information Consent:** Data Protection Law may require us to obtain consent to the processing of special categories of personal information such as personal information that reveals racial or ethnic origin, information about a person's health, religious beliefs and other categories of 'sensitive data'. While we don't collect sensitive data as a matter of course, you may choose to disclose health and other sensitive information in limited circumstances, such as if you are experiencing a health issue which is affecting your ability to repay a loan, which we will record on our systems.
- **Authorised third parties:** At your request and with your written consent, we will liaise with a third party nominated by you to act on your behalf.
- **Telephone Contact at Work:** You may have consented to us contacting you at your workplace, where it is not your residence.

At any time you can withdraw your consent through the contact channels referenced in Section 10.

2.5 Where you have provided us with information about another person

Where you provide us with personal information relating to another person (e.g. a partner, spouse or guarantor) we rely on you to ensure that you have their consent to providing us with their information for use in accordance with this Data Privacy Notice.

3. Who do we share your data with?

3.1 Servicer

As you are aware, we outsource the servicing of your loan to a third party, Pepper Asset Servicing (“Pepper”). Your personal information may be accessed by Pepper staff including staff of other members of the Pepper group of companies in order to perform their duties and some of their suppliers including contractors and IT support staff, in connection with any of the purposes set out in Section 2 above. You will find details of Pepper group companies at www.peppergroup.ie/about-us

3.2 Third parties within the European Economic Area (“EEA”)

In certain circumstances we may share your information with third parties who will act on our instruction in relation to any processing of your personal information. For example:

- We may share your information with insurers, solicitors, accountants, valuers, estate agents, advisers and other consultants who act on our behalf or to obtain advice.
- We may use third parties such as print providers and document storage providers.
- We use the services of a number of IT suppliers of systems and technology.
- We may share your information with third parties to comply with our legal obligations.

3.3 Third parties outside the EEA

We may transfer your personal information to organisations in countries outside of the EEA, but we will only do so where:

- The European Commission has decided that the country or organisation we are sharing your information with will protect it adequately;
- We have entered into a contract with the organisation with which we are sharing your information to ensure it is adequately protected on terms approved by the European Commission; or
- The transfer has been authorised by a relevant data protection authority.

3.4 Central Credit Register (CCR), credit reference and fraud prevention agencies

We may access and use your personal information from the CCR and other credit reference agencies such as the Irish Credit Bureau (ICB):

- To manage and take decisions about your accounts.
- If you apply to have your existing loan restructured.
- If an amendment is required to the records held on the CCR or ICB.
- For prevention of fraud, money laundering or criminal activity.
- To trace debtors and recover debt.

While you have a loan with us, we will continue to share your personal information, including information about the performance of your loan, with the CCR and the ICB. This will include the outstanding balance on your loan, the regularity of repayments, number of overdue repayments, any arrears and the date of the next payment. This information will be made available to other organisations, including financial services providers, so they can make decisions about you (such as considering any application for credit and credit related services), to trace debtors, recover debts, prevent or detect money laundering and fraud, and to manage your account.

If you want further details of how your information will be used by the CCR or ICB, please visit their websites or contact them directly at:

CCR

Website: www.centralcreditregister.ie; email: consumerinfo@centralcreditregister.ie; phone: +353 (0)1 2245500

ICB

Website: www.icb.ie; phone +353 (0)1 2600388

3.5 Loan acquisitions or transfer of rights

Your personal information may be disclosed to prospective purchasers of loans and anyone else to whom we may or purport to assign or transfer our rights under the loan in connection with a securitisation or other form of funding arrangement. Whenever we disclose your personal information to prospective acquirers of your loan, we will do so under strict conditions of confidentiality.

4. Types of personal information we collect and how it is used.

We collect and process various categories of personal information at the start of and for the duration of your relationship with us. We limit the collection and processing of personal information to such information as is necessary for the purposes set out in Section 2 above.

Personal information requested over the course of your relationship with us may include, but is not limited to, the following:

- Identity information: Name, date of birth, proof of identification (such as driving licence or passport). Examples of how we use this information include: to identify you and to comply with our legal and regulatory obligations.
- Contact information: Address, telephone number, email address. Examples of how we use this information include: to manage and administer your loan(s) with us, to send you information which you request and to respond to your queries and complaints.
- Personal circumstances: Employment status and details, financial circumstances including income and expenditure, assets, borrowings, savings, lifestyle needs. Examples of how we use this information include providing you with products such as a new loan or restructuring or rescheduling of a loan.
- Interactions with Pepper staff: Whenever Pepper's staff member meets you or contacts you, a note of this interaction is recorded on a loan management system. In addition, Pepper sometimes record telephone conversations to improve services, for training purposes, to resolve complaints and as required by relevant regulations and Central Bank of Ireland Codes of Conduct. However, they will always let you know when they are recording our calls with you.
- Health information: With your consent, we sometimes process information on your health when you are applying for a product or service or over the course of your relationship with us. You may choose to share health information with us, for example, if you are in financial difficulties as a result of a health issue you may provide us with this information in writing or by phone in which case it may be included in a call recording.
- Other: We may also collect and process personal information made available by other parties, for example credit reference agencies such as Central Credit Register or Irish Credit Bureau; or entities such as An Post.

5. Your rights in relation to the personal information you have given to Shoreline.

You have a number of rights in relation to the personal information which Shoreline holds about you. If you choose to exercise any of these rights, we may ask you to verify your identity by providing us with additional documentation such as an up to date proof of identity.

- Timelines: We will consider your request and provide a response within 1 month of receipt of your request and

verification of your identity, where required, as set out in Section 4 above. This time period may be extended in exceptional circumstances. In these cases we will advise you of this along with confirming the reasons for the extension.

- How to make a request: You can make your request using any of the channels set out in Section 10.

5.1 Right of access to your personal information

You have the right to get confirmation about whether we process any of your personal information and, if so, how we use it. We use this Data Privacy Notice to meet this obligation. In addition, if we process your personal information, you have a right to request a copy of the personal information that we process. If we have provided a copy of this personal information within the previous 12 months, we will not provide the same copy to you again but will provide any additional personal information we have obtained and processed since the last request.

- Fees: Typically there is no fee for a copy of your personal information although we have the right to apply a reasonable fee in exceptional circumstances if your request is manifestly unfounded or excessive.
- Format of response: You may request that the information is provided to you orally, in a hard copy format or in electronic format. If you require the information in electronic format, you will need to provide us with your email address. We will email the information to you encrypted with a password and you will need to contact us by telephone to provide you with the password. It is important to be aware that email is not a fully secure means of communication.
- Exclusions: Some personal information is exempt from the right of access, such as personal information that is not available from a reasonable and proportionate search, privileged information, confidential expressions of opinion or where providing a copy would adversely affect the rights and freedoms of others.

5.2 Right to correct your personal information

We try to ensure that the information we have about you is accurate and up to date. Sometimes we may ask you to verify that the information we have is still accurate. If you believe certain personal information we hold about you is incorrect, incomplete or out of date, you can contact us to correct the information.

- Restrict processing: While we are considering your query, you may request that we restrict processing your personal information.

5.3 Right to delete your personal information

You may request deletion or erasure of your personal information in the following circumstances, provided there are no legal obligations or overriding legitimate grounds that require us to keep it:

- Where the personal information is no longer necessary for the purpose for which it was collected.
- Where you withdraw your consent (in the case of data held in reliance on your consent such as those in 2.4 above).
- Restrict processing: While we are considering your query, you may request that we restrict processing your personal information.

5.4 Right to withdraw your consent

If you have provided us with your consent to process your personal information, for example in the circumstances set out in 2.4 above, you have the right to withdraw that consent. Provided there is no other legitimate reason for us to process that personal information we will stop processing that personal information.

5.5 Right to request your information be transferred

You can request that certain personal information which you have provided to us be transferred to you or to another

service provider. This applies to information that we are processing for the performance of your contract or based on your consent.

5.6 Right to object

Where your personal information is being processed on the basis of our legitimate interests, we must ensure that there is a fair balance between our legitimate interests and your rights. If you disagree with your personal information being processed in this manner, you are entitled to object.

6. How do we use your personal information for direct marketing?

Sometimes we may want to make you aware of products and services which we think may be of interest to you based on the product or service you have already received from us, and the personal information we hold about you.

If you have consented to direct marketing we may send you marketing communications. You may also have consented to us sharing your personal information with carefully selected third parties and partners whose products or services we think may be of interest to you.

If you would like to withdraw your consent at any time, please refer to Section 2.4 above.

7. How we keep your information safe

We make every attempt to ensure your personal information is protected and secure. We do this by considering data privacy when developing, designing, selecting and using new systems, products and processes that are used to hold or process that personal information and by limiting access to your personal information.

We use a variety of technical and organisational security measures to protect your personal information. These include computer safeguards; ensuring files are stored securely and that our offices have adequate security.

8. How long do we retain your personal information?

By providing you with a loan, we create records that contain your personal information. Records can be held on a variety of media (physical or electronic) and formats.

Your personal information is retained for different periods of time depending on the purposes for which they are required to be retained. We hold your personal information while you are a customer and for a period of time after that. If you have a loan with us, normally we keep customer account records for up to seven years after your relationship with us ends. Other personal information may be kept for shorter periods.

Sometimes we may have to keep your information for longer periods, for example where we need to retain information or documents relating to actual or prospective legal proceedings, a court order or an investigation by law enforcement agencies or our regulators.

9. Updates to this Data Privacy Notice

This Data Privacy Notice may be updated from time to time. You will always find the most up to date version on our servicer's website at www.peppergroup.ie.

10. How you can contact us

If you have any queries about your data protection rights, you can contact Pepper Asset Servicing by phone at the following number or in writing at the following address:

Write to: Customer Services, Pepper Asset Servicing, PO Box 693, Shannon, Co. Clare
Phone: 1890 303704 or +353 (0)61 236910

If you wish to raise a query or make a complaint in relation to how we handle(d) your personal information, you can write to us, at the following address.

Shoreline Data Protection Office, c/o Pepper Asset Servicing, 4th Floor Two Park Place, Upper Hatch Street, Dublin 2.

In the event that you are not satisfied with our response to your query or complaint, you may be entitled to complain to the Office of the Data Protection Commission:

Write to: Office of the Data Protection Commission; Canal House; Station Road; Portarlinton; Co. Laois
Phone: +353 57 8684800 or LoCall: 1890 252231
Email: info@dataprotection.ie
Website: www.dataprotection.ie

11. Beneficial Owners

The communication address for each beneficial owner is listed below:

- EUROPEAN RESIDENTIAL LOAN SECURITISATION 2018-1 DAC (1st Floor, 1-2 Victoria Buildings, Haddington Road, Dublin 4, Ireland).
- Shoreline Residential DAC (6th Floor, Fitzwilliam Court, Leeson Close, Dublin 2)