

Information on the processing of Customer's personal data

In accordance with Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (hereinafter referred to as "GDPR"), PRA Group Polska sp. z o.o. as the entity managing all receivables of the Data Controller informs that:

1. The Data Controller of your personal data is:

Horyzont Non-Standardised Debt Closed End Investment Fund with registered office in Warsaw (Contact details: 68 Prosta Street, 00-838 Warsaw). Hereinafter called "Horyzont", "we", "our" and "us".

2. The servicing entity of the Horyzont is: PRA Group Polska Sp. z o.o. with its registered office in Warsaw.

3. Point of contact regarding issues related to the processing of your data:

- i. Tel. 22 276 66 88,
- ii. Email Address: kontakt@pragroup.pl,
- iii. Address: 68 Prosta Street, 00-838 Warsaw.

4. The data was obtained:

- i. on the basis of the Assignment Agreement from the previous creditor (personal data of the debtors and in some cases their guarantors or representatives) or
- ii. as a result of actions conducted in the process of handling receivables owed by Horyzont to you (as the principal debtor or his spouse, heir, joint and several debtor, debtor with Actio Pauliana, member of the management board representing and/or being responsible for the obligations of the company (debtor) or co-borrower), and obtained in particular from court, enforcement or other administrative authorities, in connection with conducted proceedings, from public registers (in particular, notarial records, the National Court Register, data from the Electronic Register of Land and Mortgage Register, the Central Register and Information on Business), established by detective agencies, in the event that they are commissioned with such a service or in the course of conducting operative activities directly from you.
- iii. in the course of servicing receivables, we may also collect personal data from other publicly available sources, if there is a legitimate interest of the Data Controller or from third parties with your consent.

5. Purpose of data processing and legal bases:

- i. Please be advised that your personal data will be processed by us for purposes resulting from the legitimate interests of the Data Controller, directly related to the pursuit of claims arising from the contract concluded by you, and acquired on the basis of a receivables assignment agreement concluded by the Data Controller with the original creditor (Assignment Agreement). In addition, if the Data Controller of your personal data is Horyzont, it also processes personal data for the purpose of managing receivables.
- ii. Our legal basis for processing your personal data is:
 - a) Article 6(1)(b) of the GDPR, we will process your personal data when it is necessary to fulfill your contractual obligations to Horyzont, which also includes payment obligations.

- b) Article 6(1)(f) of the GDPR, which indicates that processing is lawful if it is necessary for the purposes of the legitimate interests pursued by the Data Controller and Article 193 of the Act of 27 May 2004 on investment funds and management of alternative investment funds, which states that the Data Controller, as a non-standardised debt fund (as well as the entity with which a receivables management agreement has been concluded), may collect and process personal data of debtors of receivables for purposes related to the management of these receivables. Our legitimate interests relate to situations where they are not overridden by the exercise of fundamental rights and freedoms of persons whose data are processed.

- c) Article 6(1)(c) of the GDPR, which indicates that processing is necessary to comply with legal obligations imposed on the Data Controller, resulting from EU law or Polish law.

6. Categories of personal data:

We will process the following categories of personal data:

- i. Name and surname, PESEL, ID card number, nationality, date of birth, marital status, address details, contact details, data on contractual relations, debt data including repayment history and bank account numbers, data on court and enforcement proceedings, data on the property situation, data on employment and place of work, data of contact persons, data of attorneys (name and surname, address, NIP, REGON).
- ii. During conversations and contact with you, we make notes that may contain other information provided by you, which we will process if it turns out to be necessary to pursue claims.

7. Recipients of data

Your personal data may be transferred to entities cooperating with us on the basis of written contracts for entrusting the processing of personal data in order to perform the tasks and services specified in the contract for us. In addition, for the above purposes, we may transfer your data to the following recipients (i) to all our affiliated affiliates in the PRA Group of companies; (ii) to business reference agencies (this information may be added by these offices to your credit history); (iii) to any intermediaries or third parties who provide services to us, including companies used to send information to you that provide us with support and technical assistance, debt collection agents, law firms and intermediaries determining the whereabouts of debtors; (iv) to fraud prevention agencies and law enforcement authorities, including when you provide us with false or inaccurate information or when we suspect or detect fraud; (v) land registries, courts, governmental and non-governmental regulatory bodies and ombudsmen; (vi) to any third party who acquires or is interested in acquiring or securing all or a portion of our assets or interests or who are our agents in respect of carrying out all or part of our business, whether as a result of a merger, acquisition, reorganization or otherwise; and (vii) where we have your consent or to the extent required or permitted by law, including to comply with a legal order or similar legal process or governmental request, or where we believe in good faith that disclosure of that information is legally required, or we have a legitimate interest in disclosing the information, for example, when it is necessary to protect our rights and property.

8. Data transfer outside the EEA

Your personal data may be transferred outside the European Economic Area (EEA), in the manner provided by law. The transfer of your personal data outside the EEA may take place on the basis of: a decision of the European Commission stating an

adequate level of personal data protection, standard data protection clauses or, where applicable, on the basis of other transfer mechanisms provided for in the GDPR. At the request of each person whose personal data is processed, the contact person will provide electronically a copy of the concluded contractual provisions and information on the scope of the personal data transferred. Where necessary and upon explicit request, documents may be sent in paper copy. Personal data will not be transferred to international organizations.

9. Data retention:

- i. Your personal data is stored until the completion of the process of pursuing claims against you by the Data Controller, in particular until the repayment or enforcement of the claim or obtaining a final decision on the groundlessness of the claim due to the Data Controller against you.
- ii. In the event of full repayment or enforcement of claims by the Data Controller, if necessary, he will store your data from that moment for the period of limitation of your possible claims, in accordance with the provisions of the Civil Code. These claims may relate in particular to such cases as reimbursement of overpayments, return of undue benefits, as well as other complaint issues.
- iii. If the claim is the subject of an assignment agreement concluded with another entity, your personal data will be processed until the date of conclusion of the agreement, which transfers the rights to the claim to another entity (legal basis: Article 6 paragraph 1 letter f) of the GDPR, Article 193 of the Act of 27 May 2004 on Investment Funds and Management of Alternative Investment Funds).
- iv. For accounting and tax reasons, your personal data contained in accounting documents may be stored for a period of 5 years counted from the end of the calendar year in which the tax obligation arose - legal basis: art. 74 of the Accounting Act of 29 September 1994 (Journal of Laws 2018.395 i.e. of 02.20.2018).
- v. In cases related to the need to apply the provisions on counteracting anti - money laundering and terrorist financing, your personal data may also be stored for a period of 5 years, counting from the first day of the year following the year when the transaction concerning you was registered - legal basis: Article 49 paragraph 1 of the Act of 1 March 2018. on counteracting money laundering and terrorist financing (Journal of Laws of 2022, item 593, as amended).
- vi. After the expiry of the above-described retention periods, your personal data will be deleted or anonymized.

10. Your rights:

We also inform you that, subject to further legal obligations, you have the following **rights**:

- The right to access your personal data – Article 15 of the GDPR
- The right to rectify your personal data – Article 16 of the GDPR
- The right to erasure ("right to be forgotten") – Art. 17 GDPR
- The right to restrict processing – Art. 18 GDPR
- The right to data portability – Art. 20 GDPR
- The right to object to processing – Art. 21 GDPR
- The right not to be subject to a decision based solely on automated processing, including profiling – Article 22 of the GDPR
- **Right to lodge a complaint with the competent supervisory authority:**
If you believe that your personal data is processed incorrectly, you have the right to lodge a complaint with

the competent supervisory authority. Name and address of the competent supervisory authority:

President of the Office for Personal Data Protection

Address: 2 Stawki Street, 00-193 Warsaw

Tel: 22 531 03 00

E-mail: kancelaria@uodo.gov.pl

▪ **Right to withdraw consent:**

Where the processing of your personal data is based on consent given to us for one or more specific purposes, you may **withdraw your** consent at any time, provided that this does not affect the lawfulness of the processing based on consent before its withdrawal.

11. Providing your personal data is voluntary. Providing personal data by you is mandatory in a situation where the ground for the processing of personal data is a legal obligation. To the extent that the processing of your personal data takes place for the purpose of concluding or performing a contract, failure to provide them will result in the inability to conclude and perform the contract.

12. Profiling and automated decision-making

- Your personal data may be processed automatically, including profiled, in order to exercise the Data Controller's rights resulting from the legal status of the acquired receivables or to analyze the effectiveness of debt collection activities. Automated activities are, for example, the process of providing information about debtors to Economic Information Bureaus, provided that the requirements specified by law are met, or the process of analyzing how to recover debt. However, we take action to contact you during which a settlement or full repayment of debt may be concluded, which will exclude your data from the indicated automated processes.
- Personal data will not be processed in an automated manner (including in the form of profiling) in such a way that as a result of such automated processing, any decisions could be made that would cause other legal effects or otherwise significantly affect you. Profiling performed in connection with the analysis of the debt management process is aimed at recognizing cases that we can solve amicably.

13. Contact details of the Data Protection Officer

- Data Protection Officer : Daniel Szmurło
- E-mail Address: kontakt@pragroup.pl
- Correspondence address: 68Prosta Street, 00-838 Warsaw