

# Privacy notice for attorneys, representatives and contact persons

# 1. The controller of your personal data is:

- a) Horyzont Niestandaryzowany Fundusz Wierzytelności Fundusz Inwestycyjny Zamknięty with its registered office in Warsaw if you represent a Fund's debtor,
- b) a company from PRA Group Polska that has established a relationship with the person on whose behalf you are acting, e.g. in connection with the power of attorney granted, the provision of services or negotiations. Depending on the context, these are: PRA Group Polska sp. z o.o., PRA Group Polska Holding Sp. z o.o., PRA Group Polska Sub-holding sp. z o.o. or PRA Group Polska T.F.I. S.A. hereinafter: we, us, our.

#### 2. You can contact us:

- a) at the e-mail address: kontakt@pragroup.pl,
- b) by post: 68 Prosta Street, 00-838 Warsaw.
- 3. We have appointed a Data Protection Officer. You will contact them about all issues that relate to personal data:
  - a) At the e-mail address: kontakt@pragroup.pl,
  - b) by post: Prosta 68, 00 838 Warsaw, with the note: Data Protection Officer.

### 4. Data source and categories

If you have not provided us with your data directly, we have received your data from the person you represent or the entity on whose behalf you act as a contact person. We could also obtain the representatives' data from publicly available registers (i.e. Central Registration and Information on Business, REGON online database, National Court Register).

The scope of the processed data includes in particular the following categories: identification data (e.g. name and surname, place of work/name of the business, position/professional title, entry number), contact data (e.g. telephone number, e-mail address, address of the registered office), other data provided by the contractor or provided directly by you in connection with the conclusion or performance of the contract.

## 5. Purposes and legal bases for the processing of personal data

Your personal data is or may be processed in order to:

- a) conclude and perform a contract (if a contract with the Controller has been concluded) the legal basis for the processing is the premise for concluding the contract (Article 6(1)(b) of the GDPR¹);
- b) cooperate in order to provide services to the Controller the legal basis for the processing is the legitimate interest of the Administrator (Article 6(1)(f) of the GDPR);
- c) comply with obligations arising from the provisions of law, in particular tax and accounting regulations, counteracting money laundering and terrorist financing the legal basis for processing is a legal obligation (Article 6(1)(c) of the GDPR);
- d) to establish, pursue or defend against possible claims the legal basis for the processing is the legitimate interest of the Company (Article 6(1)(f) of the GDPR).

### 6. Data recipients

We may transfer your personal data to other entities, the so-called data recipients. If they perform services for us, we conclude agreements with them to entrust the processing of personal data. The list of recipients of your data is variable, so we inform you about the categories of data recipients:

- a) companies from the PRA Group,
- b) subcontractors who provide us with services, including in particular postal, debt collection, legal, IT, network security, archiving and document destruction services
- c) public bodies or institutions, within the scope of their statutory duties.

<sup>&</sup>lt;sup>1</sup> GDPR, i.e. Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).



### 7. Data transfer outside the European Economic Area

We may transfer your personal data outside the European Economic Area (EEA). The basis for the transfer of data is: a decision of the European Commission, which states an adequate level of protection of personal data, standard contractual clauses or other transfer mechanisms, regulated in Chapter V of the GDPR. Upon your request, we will provide you with an electronic or paper copy of the concluded contractual provisions and information about the scope of the personal data transferred.

### 8. Data Retention

The duration of the processing of your data depends on the role in which you act:

- a) Personal data of debtors' attorneys we will process them throughout the entire period of debt pursuit, and after its completion, until the expiry of the limitation period for claims,
- b) We will process the personal data of attorneys, representatives and contact persons that we have obtained in connection with the concluded contract for the duration of an agreement, and after its termination by:
  - i. period necessary to perform obligations or rights under the law. To the extent that we process the data for the purposes of fulfilling accounting and tax obligations, your personal data may be stored for a period of 5 years from the end of the calendar year in which the tax obligation arose. With regard to the need to retain data for the purpose of demonstrating obligations under the Act on Counteracting Money Laundering and Terrorist Financing, we will retain the data for a period of 5 years, counted from the end of business relationships or transactions
  - ii. the period of limitation of claims.

#### 9. Your rights

In connection with the processing of personal data, you have the right to: access your personal data, rectify it, limit its processing, as well as the right to request deletion of data. To the extent that we base the processing on our legitimate interest, you have the right to object to the Controller.

You also have the right to lodge a complaint with the competent supervisory authority. In Poland, it is the President of the Office for Personal Data Protection.

### 10. Obligation to provide data

Providing the data of attorneys is voluntary, but necessary to demonstrate the authorization to act on behalf of the principal. Providing personal data of representatives and contact persons is necessary to conclude an agreement and perform it — without providing them, it is impossible to conclude an agreement and take action in connection with its implementation.

## 11. Automated decision-making process

Your personal data is not subject to automated decision-making.