

IFA Finance Designated Activity Company - Privacy Statement –

1. About this statement

This statement explains the approach of IFA Finance Designated Activity Company (hereinafter referred to as “IFA Finance DAC”) with respect to Personal Data of its clients’ customers (hereinafter referred to as the “Data Subject”) within the recovery process. It also informs the addressee about data protection rights and how to exercise them.

2. Data controller

The protection of the Data Subjects’ privacy is of the utmost significance to us. Therefore, IFA Finance DAC has committed itself to fully implement the principle of data minimization under the EU General Data Protection Regulation (hereinafter referred to as “GDPR”).

This means in detail, that IFA Finance DAC purchases accounts receivables or loans from its clients (hereinafter referred to as the “previous creditors”), without processing of the Personal Data of the Data Subjects. The previous creditors assign the accounts receivable or loans to the new creditor IFA Finance DAC (legal transfer), while they transmit the Personal Data of the Data Subjects directly to the local Asset Managers commissioned by IFA Finance DAC (refer to figure 1).

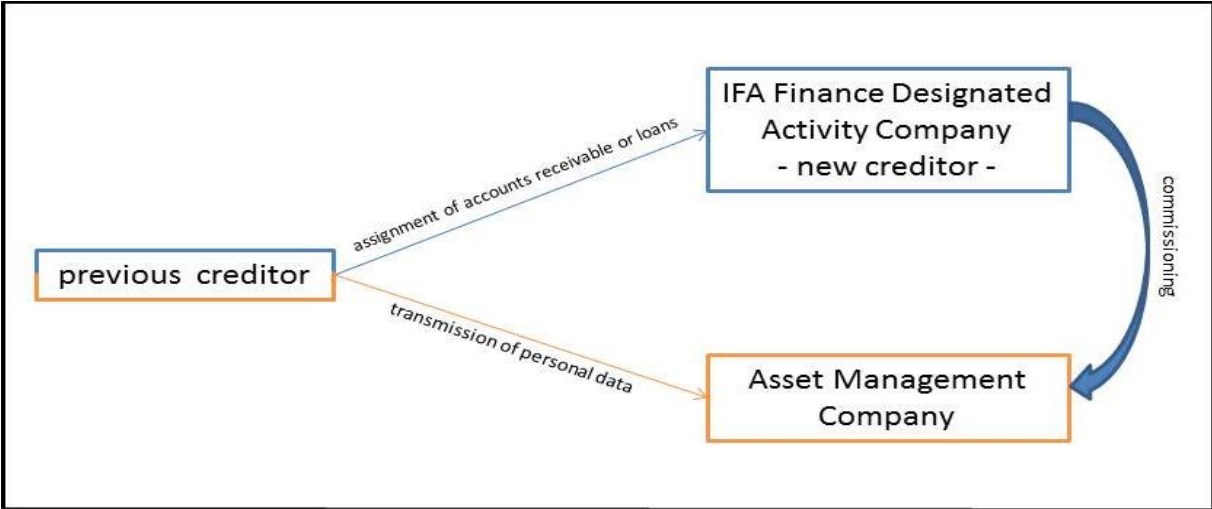


Figure 1: Legal assignment of purchased claims vs. Transmission of Personal Data

Due to the fact, that IFA Finance DAC purchases the accounts receivable and loans as well as the associated information, we are considered as Controller, besides the Asset Manager.

Contact Details:

IFA Finance Designated Activity Company
The Arvato Building, Eastpoint Business Park
Dublin 3, Ireland

3. Which information does IFA Finance DAC collect about the Data Subjects?

IFA Finance DAC does not process information, especially Personal Data related to purchased accounts receivable and loans.

4. Which information do the Asset Managers collect about the Data Subjects?

If you need more information about the data processing of the Asset Managers, please refer to the data protection statements of the local Asset Manager's website.

Sweden	https://www.gothiagroup.com/sv/personuppgiftspolicy/
Norway	https://www.gothiagroup.com/no/privacy-policy/
Finland	https://www.gothiagroup.com/fi/privacy-policy/
Denmark	https://www.gothiagroup.com/da/privacy-policy/

5. Transfers outside the EU/EEA

In general, IFA Finance DAC does not transfer Personal Data outside the EU or EEA. If IFA Finance DAC would transfer Personal Data outside the EU or EEA, IFA Finance DAC will ensure that Personal Data is protected by an adequate level of protection or appropriate safeguards. Such safeguards could, for example, be contractually agreeing on the confidentiality of Personal Data and matters related to processing in accordance with applicable law, such as by using model contract clauses approved by the European Commission and otherwise in a manner ensuring that Personal Data is processed in full accordance with this statement.

6. Which rights does the Data Subject have?

Access: The Data Subject can request a copy of the Personal Data that the Asset Manager processes.

Correction: To make sure that the Personal Data of the Data Subject is accurate and up to date, the Recipient may ask the Asset Manager to correct or remove information which is inaccurate.

Erasure: The Data Subject can request that the Asset Manager erases the Personal Data. The Asset Manager may not be able to delete the Personal Data right away, for example when the Asset Manager still needs it for the collection process. The Asset Manager is not allowed to erase Personal Data about the Recipient that the law requires to keep.

Restriction of processing: The Data Subject may have the right to restrict the processing pursuant to Article 18 GDPR.

Objection: The Data Subject has the right to object to the processing of Personal Data pursuant to Article 21 GDPR. This can be done by sending an e-mail to the local Asset Manager:

Sweden	info.se@arvato.com
Norway	personvernombud@gothiagroup.com
Finland	tietosuoja.fi@arvato.com
Denmark	info@gothia.dk

Complaints: The Data Subject can lodge a complaint with IFA Finance DAC, the local Asset Manager or local data protection authority.

7. With whom does IFA Finance DAC share the Data Subjects Personal Data?

IFA Finance DAC does not transmit or share Personal Data with third parties, other than the commissioned Asset Managers.

In some cases, the Asset Managers may transmit Personal Data of the Data Subjects on behalf of IFA Finance DAC to a credit protection association.

8. Questions related to data protection

If you have any questions regarding this Data Privacy Statement or data protection, please address them to the local Data Protection Officer debtpurchase_dpo@arvato.com.

This Privacy Statement was last updated on 2018-08-08