

Re: PANELVIEW DESIGNATED ACTIVITY COMPANY

DATA PROTECTION NOTICE

1. Purpose of Notice

Panelview Designated Activity Company is beneficial owner of a portfolio of mortgage loans. This notice sets out details of how personal information relating to you, as a borrower ("**Personal Data**") will be handled by Panelview Designated Activity Company ("**Panelview**", "**we**", "**our**", "**us**"), as controller of the Personal Data (as specified in Section 4 of this notice below), and / or on Panelview's behalf by its advisers in accordance with the General Data Protection Regulation ("GDPR").

2. Contact Us

If you have any questions in relation to Panelview's use of your Personal Data or would like to submit a request with respect to your rights listed below, please contact Panelview DAC, C/o Lapithus Management DAC, Huguenot House, St Stephens Green, Dublin 2.

3. Changes to this Notice

We may update this Data Protection Notice from time to time. If we make any material changes, we will inform you in writing. An up to date version of this Data Protection Notice will be available at <https://www.lapithus.com>

4. Personal Data Processed by Panelview

Panelview processes your Personal Data as provided to us by the original lender, the Loan Owner and appointed Credit Servicing Firm, including information provided in the original application for your mortgage loan and information that we collect, generate or observe while administering your mortgage loan. This information will include:

- a. **Information you provide to the Loan Owner:** this might include name and address (including proofs of name and address), contact details, date of birth, gender, nationality, photograph, signature, occupational history, marital status, dependents, job title, income, assets, other financial information (such as details of expenditure), bank details (including bank account statements), personal public service number, tax residency and tax identification information.
- b. **Special Categories of Data provided to Panelview;** this might include health information provided pursuant to the Central Bank of Ireland's Code of Conduct on Mortgage Arrears and its Consumer Protection Code 2012, including details of any illness, disease, condition or disability that might affect your ability to work.
- c. **Information that Panelview obtains from third party sources;** This might include information obtained from public websites, social media and information received from intermediaries.

Such third parties include:

- Credit reference agencies
- Third parties that provide information regarding criminal background, economic sanctions and political associations
- Agencies that perform asset traces or occupancy checks

5. Why Panelview Processes your Personal Data

Panelview collects and processes your Personal Data on various legal basis for different purposes, including those set out below.

Legal Basis	Purpose(s)
<p>Performance of a Contract</p> <p>Panelview may process your information in the management of its investment in the Oak portfolio</p>	<ul style="list-style-type: none"> • Panelview and its appointed adviser Lapithus Management DAC ("Lapithus") an affiliate company that provides portfolio advisory services to Panelview. This will include, without limitation, the performance of its contractual duties and obligations, monitoring the performance of your loan, monitoring payments & reviewing requests for forbearance, maintaining and providing information to service providers and advisers as necessary.
<p>Legitimate Interests</p> <p>Panelview processes your Personal Data in order to exercise or preserve its legitimate business interest(s).</p>	<ul style="list-style-type: none"> • In order to transfer your loan, or in relation to a possible transfer your loan, to another party, pursuant to a contract in which we agree that the other party must comply with legislation and regulations on personal data protections. • To make relevant disclosures in the course of a merger, acquisition of Panelview, or a potential merger or acquisition. • To validate and verify information for security purposes, including for the prevention of fraud. • To manage our services, including monitoring and resolving complaints. • To send relevant administrative information or permit the processing of such information by the appointed servicer Pepper Asset Servicing and their successors. • To exercise or defend a legal claim, including in the context of litigation, arbitration and similar proceedings against the firm, its agents or directors or its employees in connection with the loan.
<p>Compliance with Legal Obligation</p> <p>Panelview may process your Personal Data in order to comply with its relevant legal and regulatory obligations.</p>	<ul style="list-style-type: none"> • To ensure compliance with Panelview's business, tax and regulatory obligations, including its related reporting obligations, the management of its credit and mortgage loans and other related obligations imposed upon Panelview and its servicer(s). • To assist Panelview's auditors in the auditing of Panelview in accordance with its legal obligations. • To investigate, detect, prevent or prosecute crimes in relation to the prevention of fraud, tax evasion, money

	laundering and/or terrorist financing. <ul style="list-style-type: none"> • To share data with An Garda Síochána, law enforcement, tax authorities or other government and fraud prevention agencies where we have a legal obligation and complying with production and court orders.
Special Categories of Data – data relating to your health	
Legal Basis	Purpose
Your explicit consent.	<ul style="list-style-type: none"> • We may need to review and advice upon specific requests or proposals in support of which you provide health related data.

Please note that you have a right to object to the processing of your Personal Data where that processing is carried out for our legitimate interests or to withdraw your consent, where we rely upon your consent for processing the special categories of data specified above.

If you do not provide the Personal Data or withdraw consent for processing special categories of Personal Data, as specified above, we may not be able to support the provision of services you require.

6. Third Party Recipients of your Personal Data

Panelview may disclose your Personal Data to its relevant service providers and/or other third parties including:

- Lapithus Management DAC, and their affiliates and other service providers who will manage the administration of your loans;
- our auditors and their successors;
- our legal advisors;
- appointed receivers;
- asset trace investigators;
- estate agents;
- shareholders and investors;
- our corporate administrators including the company secretary;
- the bank through which your payments are processed;
- the Irish Revenue and other national revenue authorities;
- an Garda Síochána.

Panelview or its service providers may also disclose your Personal Data to any other persons or entities as agreed between Panelview and the relevant service provider, or as may be required or expressly permitted by applicable laws.

7. International Transfer of your Personal Data

The disclosure of your Personal Data to the third party recipients set out above may involve the transfer of data to the UK, and other jurisdictions outside the European Economic Area ("EEA"). Such countries may

not be subject to equivalent data protection laws as countries within the EEA. Any transfer of your Personal Data to jurisdictions outside the EEA may only occur in accordance with the requirements of the GDPR. For example, in connection with the transfer of your Personal Data to jurisdictions outside the EEA, Panelview has authorised Lapithus Management DAC as its delegate, to enter into standard contractual clauses, as prescribed under the General Data Protection Regulation, with relevant parties to whom your Personal Data will be transferred.

8. Retention of your Personal Data

Panelview will retain Personal Data for as long as necessary or permitted in light of the purpose(s) for which it was obtained. The criteria used to determine the retention periods are:

- the duration of your relationship with Panelview;
- whether there is a legal obligation to which Panelview or its appointed servicers are subject, such as retaining information collated in accordance with the rules of the Central Bank of Ireland, or under anti-money laundering legislation, which will be kept for **6 years** after termination of your relationship with us; and
- whether retention is advisable in light of Panelview's legal position (such as with respect to applicable statutes of limitations, litigation or regulatory investigations), in which case the Personal Data may be kept for up to **7 years** after termination of your relationship with us, or for the duration of the proceedings or investigations for a period not exceeding 10 years from the date of your last transaction.

9. Your Data Protection Rights

You have a number of rights in relation to your Personal Data, which are set out in the table below. Note that in certain circumstances these rights might not be absolute.

Right	Further Information
Right of Access	You have the right to request a copy of the Personal Data held by Panelview about you and to access the information which Panelview holds about you. Panelview may charge you for making such an access request where we believe your request is unjustified or excessive.
Right to Object	You have a right to object at any time to the processing of your Personal Data where Panelview processes your Personal Data on the legal basis of pursuing Panelview's legitimate interests.
Right to Rectification	You have the right to have any inaccurate Personal Data which Panelview holds about you updated or corrected.
Right to Erasure	In certain circumstances, you may also have your Personal Data deleted, for example if you exercise your right to object (see above) and Panelview does not have an overriding reason to process your Personal Data or if

	Panelview no longer requires your Personal Data for the purposes as set out in this notice.
Right to Restriction of Processing	You have the right to ask Panelview to restrict processing your Personal Data in certain cases, including if you believe that the Personal Data Panelview holds about you is inaccurate or Panelview's use of your information is unlawful. If you validly exercise this right, Panelview will store your Personal Data and will not carry out any other processing until the issue is resolved.
Right to Data Portability	You may request Panelview to provide you with your Personal Data which you have given Panelview in a structured, commonly used and machine-readable format and you may request Panelview to transmit your Personal Data directly to another data controller where this is technically feasible. This right only arises where: (1) Panelview processes your Personal Data with your consent or where it is necessary to perform Panelview's contract with you; and (2) the processing is carried out by automated means.

Should you consider that the processing of your Personal Data by Panelview or its service providers infringes the provisions of the General Data Protection Regulation, you may lodge a complaint with a supervisory authority in the EU Member State of your habitual residence, place of work, or in the place where an alleged infringement occurred.