

PRIVACY NOTICE

Ares Lusitani STC, S.A (hereinafter referred to as “Ares Lusitani” or “Assignee”) is a credit securitization company, headquartered at Edificio Colombo, Torre Oriente, Avenida do Colégio Militar, No. 37 F, 4th Floor, 1500-180 Lisbon. Its corporate purpose is to carry out credit securitization operations through the acquisition, management, and transfer of credits, as well as the insurance of securitized bonds to pay for the acquired credits.

In this context, Ares Lusitani participates in credit assignment and acquisition processes for securitization, acquiring all rights, titles, and interests related to those credits.

As a result of the communicated credit assignments, all personal data contained in the assignor’s database (which may include full name, date and place of birth, nationality, signature, gender, marital status, personal identification number, contact details, as well as details of the credit application and financial situation and/or history) are transferred to the current creditor, who will assume, from the date of assignment, the role of data controller, including any other data provided by the credit holders during subsequent contacts or extracted from public sources, as permitted by law.

In accordance with Regulation (EU) 2016/679 and other applicable data protection legislation, we inform you that Ares Lusitani will process your personal data for the purpose of managing the relationship between credit holders and the procedures related to the management and collection of the assigned credit. Personal data is necessary to ensure proper compliance with the contractual relationship between the parties, maintain contact, and guarantee the efficiency of our activity through various internal loan processing activities, such as:

1. Verification of the integrity and validity of credits (activities that help confirm that the data is suitable for its purpose);
2. Combining data from other sources to confirm identity, contact details, and the existence of assets used as collateral (where applicable);
3. Optimization of our systems and networks to prevent unauthorized access, intrusion, or misuse of company systems, including the prevention of personal data breaches.

The legal basis for collecting and processing personal data is the Assignee’s status as creditor, exercising its rights to manage and recover outstanding amounts, as well as the need to ensure compliance with legal obligations and pursue its legitimate interests.

In some cases, the Assignee may engage external service providers to perform certain tasks on its behalf in connection with your credit, if applicable. For this purpose, we will share personal data with contracted service providers so they can perform their tasks in accordance with our instructions.

Similarly, some personal data of credit holders may be disclosed to any administrative, police or judicial authority acting within its legal competence. If legal proceedings are initiated, we may also share such data with all persons/entities involved, such as lawyers, debt collection agencies, enforcement agents, courts, bailiffs, and other judicial officers.

In compliance with applicable law, if credit holders fail to pay the debt within the established deadline and provided that the legal requirements are met, personal data may be included in files related to non-compliance with financial obligations with Banco de Portugal (“Credit Responsibility Center”).

Personal data may also be disclosed and/or transferred to other institutions within the Hipoges group (located in the European Union, with no international disclosure or transfer) to optimize Ares Lusitani’s financial and accounting management and/or for any other purpose described herein, including compliance with requirements related to risk concentration, solvency, proof of capital adequacy, or in cases where disclosure is mandatory under applicable regulations or legislation.

Personal data will be stored for the duration of the relationship between credit holders and the Assignee. Once this relationship ends, personal data will be properly blocked for a period of seven (7) years for legal or regulatory reasons. If shorter legal retention periods apply, we will delete the data accordingly. In any case, if a longer legal retention period applies or is necessary to prove compliance with contractual or other obligations, Ares Lusitani will retain the data until the statute of limitations for the corresponding rights and/or legal obligations expires, making it available only to public and judicial authorities if required.

Upon credit assignment and notification, the credit management entity (Servicer) acting on behalf of Ares Lusitani will be indicated, as well as the entity to which data subjects may exercise their rights of access, information, rectification, erasure, objection, restriction, data portability, not being subject to decisions based solely on automated processing, and withdrawal of consent. These rights may be exercised by sending a communication along with proof of identity (if requested) to the contacts indicated in the same notification.

Finally, we inform you that you have the right to lodge a complaint with the competent supervisory authority in Portugal, the Comissão Nacional de Proteção de Dados.