

BRAUNTON PROPERTY FINANCE DAC PRIVACY NOTICE

This Privacy Notice (the **Notice**) describes how Braunton Property Finance Designated Activity, the beneficial owner of your loan, or the loan you guarantee (**Braunton, we, us and our**), collects and uses personal information about you. The Notice also explains how we protect this information and the rights you may have in relation to this information.

Braunton is an independent controller of the processing of all personal information that falls within the scope of this Notice. This Notice indicates what personal information is processed by us and for what purpose, and to which persons or entities the information will or may be provided. We may share your personal information with certain third parties.

If you have any questions, feel free to get in touch via one of the methods set out in the 'Contact us' section below.

1. WHAT PERSONAL INFORMATION DO WE PROCESS ABOUT YOU?

We typically process the following types of personal information about you:

Identification information: such as name (including name prefix or title), gender, age, date of birth, proof of identification (such as driving licence or passport) and internal identifiers.

Contact information: such as email address, residential address or phone number.

Personal circumstances and financial information: including employment status and details, bank statements, tax information, payment card details, savings, debts such as loans and credit cards, income and expenditure, employer and pension benefits, and other assets.

Lifestyle and personal circumstance information: including any information you or a co-borrower provides to us regarding your family (including marital status), lifestyle and other circumstances, as relevant to our interest in the loan.

Information relating to the loan: including loan identification numbers (for example, loan ID), type of loan (for example, residential), original and current interest rates applying to the loan, loan balance, information relating to the previous owner(s) of the loan and information relating to loan repayments.

Business records: including copies, notes and records relating to any correspondence and communications with or relating to you, such as copies of letters between us if you contact us. Data we add to records associated with you and business records relating to our financial interest in, or exposure to, the loan and compliance with relevant legal, regulatory, compliance obligations and prudential practices.

Sensitive personal information: we would not typically process such information but may process health information or information about criminal convictions where required or authorised by applicable laws or where you have consented to such processing.

Information from third parties: including credit references.

2. HOW DO WE USE YOUR PERSONAL INFORMATION?

We use your personal information for specific purposes. We are not engaged in provision of credit servicing activities so will not use your personal information for purposes relating to the provision of credit servicing activities for any loan.

In particular, depending on whether you are a borrower or a guarantor, we may process your personal information for the following purposes and for compatible purposes:

- to identify you and to verify your information as part of our efforts to prevent money laundering, terrorist financing, tax avoidance and/or fraud;
- to assess and respond to enquiries and requests that you direct to us (if any);
- to prevent imminent and serious harm to a person or property;
- to respond to queries and requests raised by international and Irish regulatory authorities, law enforcement and/or other government agencies;
- to deliver mandatory communications as required by legislation or regulations;
- to investigate and resolve complaints;
- to comply with relevant law, regulation or other requirements;
- to manage regulatory matters, investigations and litigation;
- to assess, monitor and manage financial, reputational and other risk;
- to monitor, maintain and improve internal business processes, information, technology and communications;
- to ensure business continuity and disaster recovery and to respond to information technology and business incidents and emergencies;
- to protect our business, clients, staff, systems and data including ensuring adequate network and information security and fraud prevention protections are in place; and
- to undertake system testing, for example, prior to implementing system improvements.

3. FROM WHICH SOURCES DO WE OBTAIN YOUR PERSONAL INFORMATION?

We receive personal data on a periodic basis from Pepper Asset Servicing (**Pepper**) in connection with our financial interests in the loan. Pepper is the legal title holder of the loan and carries out credit servicing activities in respect of the loan for Braunton (the beneficial owner). See Pepper's separate data privacy notice, (which is also referenced in your Hello Letter and available on Pepper's website (www.peppergroup.ie)) for more information on how Pepper uses your personal data.

We may also receive personal data from the previous owner(s) of the loan when we commence the process of acquiring beneficial ownership of the loan.

Where you have taken or guaranteed a loan jointly with another person, we may have obtained your personal information from a co-borrower. If you have not authorised the relevant co-borrower to provide your personal information to us, please let us know as soon as possible.

We also sometimes obtain personal data from the following third parties with whom we work:

- asset managers, field agents and law or property receivers;
- our solicitors;

- credit reference agencies;
- fraud prevention agencies; and
- law enforcement agencies or government agencies.

In addition, we also may collect information about you from public data sources (such as sanctions screening registers) and directly from you if you choose to contact us.

4. ON WHAT LEGAL BASIS DO WE USE YOUR PERSONAL INFORMATION?

We use your personal information on the following basis:

- for the legitimate business interests of Braunton and others, including Pepper and our affiliates and representatives, including:
 - to carry out reviews, analysis and reporting activities for internal governance compliance;
 - to monitor and manage our internal business processes;
 - to ensure business continuity and disaster recovery and to respond to incidents and emergencies;
 - to undertake systems testing;
 - to analyse complaints for the purposes of preventing errors and process failures; and
 - to exercise our fundamental rights and freedoms, including the freedom to conduct a business and right to property.
- to comply with certain legal and regulatory obligations of Braunton and
- if applicable, because you have consented to the processing of your personal information.

Please note that where your personal information is processed on the basis of legitimate business interests as outlined above, we ensure that there is a fair balance between these legitimate business interests and your interests and fundamental rights and freedoms.

5. WITH WHOM MAY WE SHARE YOUR PERSONAL INFORMATION?

5.1 Access to your personal information within Braunton and its affiliates.

Braunton and its representatives are authorised to access personal information only to the extent necessary to serve the applicable and lawful purpose.

We may also share your personal information with and, where appropriate, transfer it to our group companies and affiliates and their representatives.

5.2 Access to your personal information by third parties

Depending on whether you are a borrower or guarantor, the following third parties typically have access to your personal information, where relevant for the purposes outlined in section 2:

- **financial organisations:** including Pepper, finance providers, insurance companies, business partners, co-funders, co-investors and rating agencies;
- **service providers** who perform services on our behalf: such as asset managers, valuers, estate agents, print providers, document storage providers, IT suppliers, providers of analytical services due diligence providers, administrators and fraud prevention agencies;
- **professional advisers:** including our lawyers, accountants, auditors, receivers and business consultants;
- **regulators, law enforcement agencies, government bodies and industry bodies;**
- **joint borrowers and guarantors** on your account and third parties with whom you have authorised us to communicate;
- prospective and actual purchasers, assignees and other parties with an interest in the loan in the event that Braunton, its assets or an interest in such assets may be or are sold, transferred or assigned in whole or in part, including as part of a securitisation, funding or co-investment arrangement; and
- any other parties Braunton reasonably thinks customary, necessary or advisable for the purposes described in section 2 of this notice and in any other way which does not identify you individually (including as part of an aggregated or anonymised dataset).

When third parties are given access to your personal information, we will take any required contractual, technical and organisational measures to ensure that your personal information is only processed to the extent that such processing is necessary.

6. TRANSFERRING YOUR PERSONAL INFORMATION OUTSIDE THE EEA

We may send your personal information to recipients in countries outside of the EEA (including, for example, the United States of America), whose personal data laws may not be as strong as those of your home country. Where we do so, we will always, as required by law, implement appropriate safeguards, such as EU standard contractual clauses, to ensure that your personal information is protected and that you are able to exercise your rights effectively. You can also obtain more information on the safeguards we use when transferring your personal information outside of the EEA by contacting us using the details in section 10 below.

7. HOW IS YOUR PERSONAL INFORMATION PROTECTED?

We have taken adequate safeguards to ensure the confidentiality and security of your personal information. We have implemented appropriate technical, physical and organisational measures to protect personal information against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorised disclosure or access as well as all other forms of unlawful processing (including, but not limited to, unnecessary collection) or further processing. Examples are IT security policies, maintaining confidentiality, staff training and secure servers.

8. HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION?

Your personal information is retained for different periods of time depending on the purposes for which it is required to be retained. We hold your personal information while we hold an interest in the loan, and normally we retain certain of your personal information for up to seven years after our interest in the loan comes to an end. Sometimes we may have to keep your information for longer periods, for example where we need to retain information or documents to defend legal proceedings or safeguard our rights, or for the purpose of a court order or an investigation by law enforcement agencies or regulatory or legal authorities.

We will also actively review the personal information we hold and delete it securely, or in some cases anonymise it, when there is no longer a legal or business need for it to be retained.

9. YOUR RIGHTS

You have a number of rights in relation to your personal information and may be entitled to:

- ask us about the processing of your personal information, including to be provided with a copy of your personal information;
- request the correction and/or deletion of your personal information;
- request the restriction of the processing of your personal information, or object to that processing;
- if applicable, withdraw your consent to the processing of your personal information where Braunton is processing your personal information based on your consent. Such withdrawal does not affect the lawfulness of processing based on consent before such withdrawal;
- request receipt or transmission to another organisation, in a structured, commonly-used, machine-readable form, of the personal information that you have provided to us; and
- complain to your local supervisory authority if your privacy rights are violated, or if you have suffered as a result of unlawful processing of your personal information. The contact details for your local supervisory authority, the Office of the Data Protection Commission, are: info@dataprotection.ie

If you wish to use any of these rights, you may do so by contacting us using the contact details set out in the 'Contact Us' section below. In addition, if you would like more information about your rights, or have any concerns about our processing of your personal information, please let us know by getting in touch with us using the details in the 'Contact us' section below. We may ask you to verify your identity by providing us with additional documentation such as an up to date proof of identity where you are seeking to exercise one of your rights outlined above.

10. CONTACT US

If you have any questions or requests regarding this Notice or the personal information that we hold about you, or need additional information, please contact:

Braunton Property Finance
DAC c/o Data Protection
Officer
Pepper Asset Servicing
4th Floor Two Park Place,
Upper Hatch Street,
Dublin 2

Phone: 1890 711 011
Int: + 353 61 236953

11. UPDATES TO THIS NOTICE

The information in this Notice may change from time to time – for example, the types of personal information that we collect, the reasons for which it is used and the ways in which it is shared may change. Any material changes to the processing of personal information described in this Notice will be communicated to you through an appropriate channel. You will always find the most up to date version of this Notice through the “Data Privacy Notice” link on Pepper’s website (www.peppergroup.ie).