

**Balbec**  
**Data Protection Notice**  
**United Kingdom**

Latest update: 10 September 2021

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## 1. GENERAL INFORMATION

The entities of the Balbec group in the United Kingdom (each a “**Balbec Company**”, together the “**Balbec Companies**”) are processing information in connection with third parties, contact persons of their contracting partners and other individuals (each an “**Individual**”, together the “**Individuals**”). This information qualifies as “*personal data*” as defined under applicable data protection law. Please see details of the Balbec Companies set out in section 4 of this Data Protection Notice, including for contact information.

The relevant Balbec Company an Individual has a relationship with will be the Controller of the personal data processed in line with this data protection notice (“**Data Protection Notice**”). This Data Protection Notice provides information regarding the processing by the Balbec Companies of personal data relating to Individuals and the rights and remedies of the Individuals related to the data processing.

## 2. UPDATES AND AVAILABILITY

Each Balbec Company reserves the right to modify the relevant part of this Data Protection Notice (which is applicable to its own data processing operations) unilaterally with effect subsequent to such modification, subject to the limitations provided for in the laws and with advance notification to the Individuals in due time, if necessary. The relevant Balbec Company may modify this Data Protection Notice especially when it is required upon changes in the laws, the practice of the competent data protection authority, business needs or employees’ needs, any new activity involving personal data processing or any newly revealed security exposures or if it is necessary because of Individuals’ feedback. When communicating in relation to this Data Protection Notice or privacy issues or otherwise keeping in contact with Individuals, the relevant Balbec Company may use the contact details of Individuals available to such Balbec Company in order to get or keep in contact with Individuals. Upon request of an Individual, the relevant Balbec Company will send a copy of the latest updated version of this Data Protection Notice to the relevant Individual.

## 3. SPECIFIC DATA PROTECTION TERMS

In certain cases, specific privacy-related terms and conditions may also be applicable of which the Individuals who are affected by them will be duly notified.

For example, such specific terms and conditions are provided for in connection with the operation of electronic surveillance systems (i.e. cameras), the entry-control systems operated in the offices of the relevant Balbec Company and cookies that are used on the website of such Balbec Company.

Where Individuals provide personal data of third parties (for example if the data of contact persons and family members are given) to the relevant Balbec Company, Individuals must ensure that such provision of third party personal data complies with applicable laws and (where required by law) the permission of such third parties has been obtained prior to making such third party personal data available to the relevant Balbec Company.

## 4. SCOPE OF THE PERSONAL DATA PROCESSED

This Section describes the scope of the personal data processed by the Balbec Companies under this Data Protection Notice.

<b>Balbec Companies</b>	<b>Description of Personal Data Processing</b>
Balbec Capital Ltd  78 Pall Mall, London SW1Y 5ES; email: <a href="mailto:privacy@balbec.com">privacy@balbec.com</a>	Balbec Capital Ltd. is performing market research and analysis in relation to investments in receivables.  Balbec Capital Ltd. is processing the following categories of personal data:

	<ol style="list-style-type: none"> <li>1. External data, such as names, telephone numbers, emails addresses, companies' address, phone numbers of any Individual the company has contact with.</li> <li>2. The identification data of its employees and job applicants.</li> <li>3. Personal data in relation to its agreements, e.g. statutory pension arrangement and occupational pension scheme, payroll services, employee benefits consultancy agreement, lease contracts, banking &amp; credit cards, service agreements as a service provider.</li> <li>4. Information received from publicly available resources. For example, information received from the website maintained by Insolvency Service of Ireland (ISI) (that is an independent statutory body) where Irish personal insolvency arrangements can be queried, and Balbec Capital Ltd. can obtain up-to-date information about personal insolvency arrangements.</li> </ol>
<p>Perinta Ltd</p> <p>Contact details: 1 Bartholomew Lane, London, England, EC2N 2AX; email: privacy@balbec .com</p>	<p>Perinta Ltd. is engaged in (i) the administration of a book of active loans, (ii) payment processing, (iii) issuance of annual statements, final certificates, and (iv) inbound and outbound calls and general customer services.</p> <p>Perinta Ltd. is processing the following categories of personal data:</p> <ol style="list-style-type: none"> <li>1. External data, such as names, telephone numbers, emails addresses, companies' address, phone numbers of any Individual the company has contact with.</li> <li>2. The identification data of its employees.</li> <li>3. Personal data in relation to its agreements, e.g. credit reporting, software system, phone rental, payroll benefits and accounting, statutory pension arrangement and occupational pension scheme, payroll services, employee benefits consultancy, lease contracts, banking &amp; credit cards, service agreements, credit submissions, payment collection.</li> </ol> <p>Perinta Ltd. is transferring personal data in the context that payment histories are submitted to credit agencies on a monthly basis, and also to the legal owners of portfolio loans. In the overwhelming majority of portfolios Perinta Ltd. has claims, but not a live contract with the debtors/data subjects; except where the portfolio is comprised of re-performing (restructured) assets or performing assets with distressed elements.</p>
<p>Perinta Funding No. 1 Limited</p>	<p>Perinta Funding No. 1 Limited is engaged in securitization.</p>

<p>Contact details: 1 Bartholomew Lane, London, England, EC2N 2AX; email: <a href="mailto:privacy@balbec.com">privacy@balbec.com</a></p>	<p>Perinta Funding No. 1 Limited is processing the following categories of personal data:</p> <ol style="list-style-type: none"> <li>1. External data, such as names, telephone numbers, emails addresses, companies' address, phone numbers of any Individual the company has contact with.</li> <li>2. Personal data in relation to its agreements, e.g. cash administration services agreement, agreements with law firms, bank account agreements.</li> </ol> <p>Perinta Funding No. 1 Limited is transferring personal data when issuing senior and junior notes to investors, notes listed on international stock exchange, and portfolio transfers and services. In the overwhelming majority of portfolios Perinta Funding No. 1 Limited has claims, but not a live contract with the debtors/data subjects; except where the portfolio is comprised of re-performing (restructured) assets or performing assets with distressed elements.</p>
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**5. PURPOSES AND LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA**

This Section describes the purposes and legal bases for the processing of personal data by the Balbec Companies under this Data Protection Notice.

<b>Categories of data</b>	<b>Purpose and legal basis of the data processing</b>
<p>External data, such as names, telephone numbers, emails addresses, companies' address, phone numbers of any Individual the company has contact with.</p> <p>Source of the data: from the relevant Individual.</p>	<p>Legitimate business interests for the company to operate its respective businesses and to manage its relationship with potential, existing and former contracting parties).</p>
<p>The identification data of employees and job applicants.</p> <p>Source of the data: from the relevant Individual.</p>	<p>Decision-making about the employment of job applicants).</p> <p>Administering the employment contract(s) that the company has entered into with its employees. This processing is necessary for the performance of the contractual obligations between the employees and the company</p> <p>Carrying out the obligations of the company under employment law</p> <p>The legitimate business interests of the company, such as ensuring high standards of employee behaviour and performance</p>
<p>Personal data in relation to agreements.</p>	<p>Legitimate business interests for the company to</p>

Source of the data: from the relevant contracting party.	operate its respective businesses and to manage its relationship with potential, existing and former contracting parties
Personal data in relation to debtors.  Source of the data: from the seller of the relevant portfolio or a contracted debt servicing entity or publicly available resources (e.g. from <a href="https://www.isi.gov.ie/en/isi/pages/home">https://www.isi.gov.ie/en/isi/pages/home</a> regarding Irish personal insolvency arrangements).	Legitimate business interests for the company to determine a more accurate price for a claim, or to manage the claims and seeking remedies in order to enforce the rights arising from the contracts

Where a purpose of processing is required for pursuing a legitimate interest of the relevant Balbec Company or any third party, then the relevant Balbec Company will make the balancing test of the underlying interests available upon a request submitted to one of the contact details of the relevant Balbec Company above.

## 6. **SHARING OF THE PERSONAL DATA PROCESSED**

This Section describes the sharing and transfers of personal data processed by the Balbec Companies under this Data Protection Notice.

<b>Third Parties</b>	<b>Data Sharing</b>
Service providers	The Balbec Companies may engage certain third parties for carrying out tasks related to data processing operations. The Balbec Companies are engaging third parties for banking, accounting and other services in the course of their day-to-day operations.
Advisors	The Balbec Companies may engage certain third parties for the provision of advice, e.g. legal advisors, tax advisors).
Balbec Capital LP (located in the USA)	The Balbec Companies may share personal data listed with Balbec Capital LP (located in the USA) for the following purposes: <ul style="list-style-type: none"> <li>• Balbec Group human resources functions and administration (including appointments or removals, pay, discipline, superannuation, work management or other personnel matters in relation to staff);</li> <li>• Balbec Group management and administration of internal information technology systems;</li> <li>• investment acquisition, due diligence, origination, underwriting, pricing, management, and disposition;</li> <li>• monitoring compliance with applicable laws and regulations, including laws and regulatory</li> </ul>

	<p>requirements aimed at detecting and preventing financial crime, insider dealing and market abuse; and</p> <ul style="list-style-type: none"> <li>the management and administration of the business of the Balbec Group generally and any other purpose in connection with that business.</li> </ul> <p>The laws of the USA do not provide for an appropriate level of data protection as required under applicable UK data protection law. However, the Balbec Companies provide appropriate and suitable safeguards in respect of the above data transfer to ensure that the personal data will be protected as required by applicable data protection law through an intra-group data sharing agreement entered into by the Balbec Companies and Balbec Capital LP, incorporating the relevant standard contractual clauses for data transfers in accordance with the relevant data protection law (also known as '<a href="#">Standard Contractual Clauses</a>').</p> <p>Please contact the Balbec Companies using the contact details above for further information on the data transfers and appropriate safeguards in place.</p>
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## 7. DATA RETENTION

The Balbec Companies retain personal data of Individuals only for as long as needed or permitted considering the purpose(s) for which it is being processed, in line with this Data Protection Notice and consistent with applicable law.

The criteria the Balbec Companies use to determine the applicable retention periods include:

- the relevant Balbec Company's contractual obligations and rights in relation to the personal data involved;
- legal obligation(s) under applicable law to retain data for a certain period of time;
- the relevant Balbec Company's legitimate interest where a balancing test has been carried out (see section 5 of this Data Protection Notice);
- statute of limitations under applicable law(s);
- (potential) disputes;
- if the Individual has made a request to have their personal data deleted (See section 9 of this Data Protection Notice); and
- guidelines issued by relevant data protection authorities.

The Balbec Companies will securely erase or anonymise Individual personal data once it is no longer needed.

## 8. DATA HOSTING

All data is stored off-site in a co-location facility hosted by a third-party provider in several countries in the EU and in the USA.

The laws of the USA do not provide for an appropriate level of data protection as required under applicable UK data protection law. However, the third party provider provides appropriate and suitable safeguards in respect of the above data transfer to ensure that the personal data will be protected as required by applicable data protection law including by way of the relevant standard contractual clauses for data transfers in accordance with the relevant data protection law (also known as ‘Standard Contractual Clauses’). You can find further detail about the safeguards here: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en).

Please contact the Balbec Companies using the contact details above for further information on the data transfers and appropriate safeguards in place.

**9. DATA PROTECTION RIGHTS AND REMEDIES**

By law, the Individuals have a number of rights (subject to certain conditions and exceptions) relating to the processing of their personal data. Individuals can exercise any of these rights by contacting the relevant Balbec Company using the contact details provided in section 4 of this Data Protection Notice.

**Each Individual has the right to object to the Balbec Companies using their personal data where the Balbec Companies rely on “legitimate interests” as a lawful basis for processing the relevant personal data (see section 5 of this Data Protection Notice) or where the Balbec Companies use an Individual’s personal data for direct marketing purposes (i.e. if the Individual does not want to receive direct marketing newsletters, updates and other marketing communications from the Balbec Companies or be profiled for direct marketing purposes).**

<b>Rights</b>	<b>What does this mean?</b>
The right to be informed	Individuals have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we are providing the information in this Privacy Policy.
The right of access	Individuals have the right to obtain access to their personal data (if a Balbec Company is processing it), and certain other information (like the information provided in this Privacy Policy). This is so Individuals are aware and can check that we are using your information in accordance with data protection law.
The right to rectification	Individuals are entitled to have their information corrected if it is inaccurate or incomplete.
The right to erasure	This is also known as ‘the right to be forgotten’ and, in simple terms, enables an Individual to request the deletion or removal of their personal data where there is no compelling reason for the relevant Balbec Company to keep using it. This is not a general right to erasure; there are exceptions.



Rights	What does this mean?
The right to restrict processing	Each Individual has the right to ‘block’ or suppress further use of their personal data processed by the Balbec Companies. When processing is restricted, the relevant Balbec Company can still store the Individuals personal data, but may not use it further. The Balbec Companies keep lists of Individuals who have asked for further use of their personal data to be ‘blocked’ to make sure the restriction is respected in future.
The right to data portability	Each Individual has the right to receive their personal data in a structured, commonly used and machine-readable format and to request that this data is transmitted to another party/controller where this is technically feasible. This right only applies to personal data the Individual has directly provided to the relevant Balbec Companies (not any other information), personal data the Balbec Companies process by automated means based on the Individuals consent or personal data processed by the Balbec Companies for the performance of a contract with the Individual.
The right to lodge a complaint	<p>Individuals have the right to lodge a complaint about the Balbec Companies handling or processing of their personal data to data protection regulators. In the UK, the data protection regulator is the Information Commissioner. Please see contact details for the Information Commissioner’s Office below:</p> <p><b>Address:</b> <u>Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.</u></p> <p><b>Phone number:</b> <u>0303 123 1113.</u></p> <p><b>Website:</b> <a href="https://ico.org.uk/make-a-complaint/">https://ico.org.uk/make-a-complaint/</a></p>
The right to withdraw consent	Where an Individual has given consent to any of the Balbec Companies for the processing of any personal data, the Individual has the right to withdraw their consent at any time (although this does not mean that any processing of personal data carried out by the Balbec Companies with the Individual’s consent up to that point is unlawful). This includes the right of an Individual to withdraw consent to any Balbec Companies using their personal data for marketing purposes.