

PRIVACY NOTICE REGARDING PERSONAL DATA PROCESSING IN CALL CENTRE ACTIVITIES

Controller:	B2Kapital Portfolio Management S.R.L. ("B2KPM") , a receivables recovery entity registered with the National Authority for Consumer Protection
Registered office:	no. 4 Vasile Alecsandri street, Building C, 2nd floor, 1st county, Bucharest, Romania
Trade Register:	J40/2666/2016
TIN code:	RO35698810
Web page:	http://www.b2kapital.ro
Email:	B2romania@b2kapital.ro
Phone:	+40 374 810 666
Fax:	+40 374 810 668

Protecting your personal data is very important to us. To do this, we undertake to provide all due diligence to ensure compliance with the legal requirements for the protection of personal data, in particular the requirements provided by General Data Protection Regulation (EU) 2016/679 (GDPR).

As part of the call-center activities, **B2Kapital Portfolio Management S.R.L. (B2KPM)** processes your personal data. Based on this privacy notice, we help you to understand how we process your personal data within call-center activities, what categories of information we process, why we process them, how long we keep them and who can access those data, including your rights and how you can exercise them.

In call center activities, phone calls (received /made) can be recorded.

How we collect your personal data?

Call Recording

- For calls that we receive from you, before the telephone connection is established, the welcome message will mention that the call is recorded and if you decide to continue the call that is the expression of your consent for the call recording.
- For calls made by us to you, when the telephone connection is established and before your identification, you will be informed that the call is recorded and you will be asked to express your consent for the call recording.

The recording will automatically stop when you initiate the call disconnection / closing or in the event you do not wish to continue the call.

How can you contact B2KPM in case you do not agree with the call recording?

In the event that you do not want your made/received calls to be recorded, you may contact us in the following ways:

- By submitting a request via post and/or courier services to B2KPM;
- By fax or by sending an e-mail to the contact details mentioned above in the preamble.
- By visiting our office.

What personal data do we process in our call center activities?

The personal data we process in the call-centre activity are those resulting from the audio recording (voice) and the data provided during the phone conversation.

Why (for what purposes) are we processing your personal data?

The purposes of the data processing and recording calls are:

- To facilitate communication and improve the service quality;
- A better understanding of your requirements;
- More efficient evaluation and training of the staff with responsibilities in customer relationship management;
- Check the recordings in case of complaints from you;
- Establishing, exercising or defending our rights in court / competent authorities / control bodies.
- To provide proof of all interactions between you and B2KPM in connection with the recovery of the claim so that we can comply with the legal obligation set forth in Article 49 of Emergency Ordinance 52/2016 on credit agreements offered to consumers for real estate.

Which is the legal ground for your personal data processing?

The legal ground for the personal data processing is your consent, fulfilment of legal obligations and legitimate interest.

What is the retention period of the records?

According to the provisions of GEO 52/2016, your personal data processed within call-center activities will be retained for the entire duration of the contract and for a period of 5 years after the termination of the contract or after the completion of the enforcement procedure.

Call records are stored in servers located on the territory of Romania and / or the European Union.

Who can access the recordings?

Recorded calls can be accessed by Authorized Users in B2KPM assigned to verify and assess the calls and / or by competent authorities.

Can I request a copy of the recording?

Requests for copies of recording must be made in writing and sent by post or e-mail. Applications will be duly considered, as the consent of all parties involved in the call is necessary prior to the release of the record.

We also inform you that under the legal provisions we have the right to charge a fee based on administrative costs. Alternatively, at the expense of the applicant, there may be possible to listen to the recordings at the B2KPM headquarters, to the extent that this option is possible.

The conditions regarding the recording and storage of calls may be reviewed periodically, depending on the applicable legal developments, as well as following the technological development, any changes made to the content of these rules being brought to your attention as data subject.

How we use (process) your personal data?

Data will be processed and stored in secure environments, through the platforms and systems specific for call centre activities and/or secured devices used by the company.

Is your data safe at B2KPM?

B2KPM believes that the security of your personal data is very important and, in this regard, ensures the implementation and periodic review of organizational and technical security measures designed to protect your data against unauthorized access, modification, disclosure or destruction. Access to your personal data is only allowed to persons authorized by B2KPM, following an appropriate assessment, according to specific attributions and responsibilities, and who have previously accepted their confidentiality obligations.

The B2KPM implements specific precaution measures and procedures for the proper prevention, identification and management of potential personal data breaches, including measures regarding your notification and the National Supervisory Authority for Personal Data Processing, under the conditions set forth by the legal provisions in force.

What are your rights and how can you exercise them?

You can exercise at any time the following rights, within the limits and conditions set forth by the applicable legislation in the field of personal data protection:

- **Right to be informed**
- **Right of access to your data**
- **Right to data rectification**
- **Right to object to data processing**

- **Right to data restriction**
- **Right to data erasure**
- **Right to data portability**
- **Right not to be subject to a decision based solely on automated processing**
- **Right to withdraw your consent**

All these rights can be exercised by submitting to us an official written request in this regard, to the contact details listed below and we will respond you within 30 days or, if the request requires a more complex analysis, this deadline may be extended by another 60 days, in this case you will be informed accordingly, the reason for extension will also be provided.

If you are convinced that your personal data is being processed incorrectly and does not comply with the legal requirements, you may file a complaint with the National Supervisory Authority for Personal Data Processing at:

No. 28-30, Gheorghe Magheru Avenue, county 1, postal code 010336, Bucharest, Romania, phone: +40318059211; e-mail: anspdcp@dataprotection.ro or the web page: <http://www.dataprotection.ro/>.

Contact details of B2KPM regarding personal data

If you have any questions or requests regarding your rights described above, please contact us:

❖ **Address:** Bucharest, no. 4 Vasile Alecsandri street, Building C, 2nd floor, 1st county, Romania,
Email: B2romania@b2kapital.ro

❖ **Data Protection Officer:**

Email: dpo@b2kapital.ro

Telefon: +40 374885637

Fax: +40 374810668

This information is provided in additions to the Information on Personal Data Processing and Protection available on the company's web site at: <https://b2kapital.ro/DataProtection>.

Sincerely yours,

B2KPM Team