

Ferratum's Principles of Processing its Bondholders Personal Data (Privacy Policy)

Latest updated on March 3, 2022

These principles of Processing the Bondholders' Personal Data (hereinafter also **principles**) describe how we, Ferratum (hereinafter also **we, us** or **our**) process Personal Data pertaining to our Bondholders or prospective Bondholders (hereinafter also **you**).

1. Definitions

- 1.1. **Bondholder** – A holder of the bonds issued in terms of the unsecured subordinated bond issuance programme being made by Ferratum pursuant to the base prospectus dated 3rd March 2022;
- 1.2. **Contract** – A contract concluded between Ferratum and the Bondholder;
- 1.3. **Data Protection Regulations** – Any applicable laws and regulations regulating the processing of Personal Data, including but not limited to the GDPR;
- 1.4. **Data Subject** - an identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- 1.5. **Ferratum** – Ferratum Bank p.l.c., Malta Registry of Companies code C 56251 with address ST Business Centre 120, The Strand, Gzira, GZR 1027, Malta; phone +356 2034 1533; e-mail info@ferratumbank.com;
- 1.6. **Multitude Group** – Ferratum together with companies the majority shareholder of which is directly or indirectly Ferratum's parent undertaking Multitude SE (Finnish Trade Register code 1950969-1, address Ratamestarinkatu 11 A, Helsinki, Republic of Finland);
- 1.7. **GDPR** – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation);
- 1.8. **Personal Data** – Any information relating to Data Subject. Data which is protected by banking secrecy may also include Personal Data;
- 1.9. **Processing** – Any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, storing, alteration, granting access to, making enquiries, transfer, viewing, etc.
- 1.10. References to **Data Controller, Data Protection Officer** and **Data Processor** in these principles have the meanings set out in and will be interpreted in accordance with the GDPR.

2. Data Controller

- 2.1. Ferratum is responsible for the Processing of your Personal Data. These principles apply where Ferratum acts as the Data Controller of your Personal Data in terms of the GDPR.
- 2.2. Ferratum is a company established under the laws of Republic of Malta and the Processing of your Personal Data shall be governed by the laws of Malta.

3. Collecting your Personal Data

- 3.1. Ferratum collects your Personal Data in the following ways:
 - 3.1.1. Through communications made to us;

- 3.1.2. Through the documents you complete in order to subscribe for bonds and then to receive interest thereon, whether such subscription takes place on the primary or secondary market;
- 3.1.3. We may receive a copy of the register of bondholders maintained by the Central Securities Depository (the CSD) on demand;
- 3.1.4. We may access the back end of the Malta Stock Exchange (the MSE) website to access a list of all trades which would have taken place during a specific time frame; and
- 3.1.5. We may receive copies of the interest warrants which are sent to you on a yearly basis, which warrants contain details relating to the yearly interest paid by Ferratum to you with respect to your investment in Ferratum, together with your name, address, identity card number, registration number and MSE account number.

4. Personal Data Processed

- 4.1. In the context of our bond issuance programme, Ferratum Processes Personal Data for the following purposes:
 - 4.1.1. concluding a Contract with our Bondholders. This includes properly identifying the Bondholder and performing any necessary credit and risk checks and assessments on the Bondholder to determine whether and on which conditions to conclude the Contract;
 - 4.1.2. for the performance of our Contract with you as a Bondholder;
 - 4.1.3. To have your Personal Data recorded on the electronic register of bondholders maintained by the CSD at the MSE on our behalf. The electronic register will contain your name, addresses, identity card number, registration number and MSE account number, as well particulars of the securities held by you. You have, at all reasonable times during business hours, access to the electronic register held at the CSD for the purpose of inspecting information held on your account. If needed, please contact the MSE for this purpose;
 - 4.1.4. performance of our obligations arising from law (e.g., anti-money laundering (AML) and terrorist financing rules and regulations, detection and prevention of fraud, etc.);
 - 4.1.5. safeguarding our rights (e.g., establishing, exercising, and defending legal claims);
 - 4.1.6. as part of our internal due diligence;
 - 4.1.7. assessing and developing further the quality of our services and products, e.g., customer support service and quality assurance service;
 - 4.1.8. to manage our relationship with you as a Bondholder, e.g., to hold an annual meeting or execute your instructions to us; and/or
 - 4.1.9. the purposes you would have requested when providing your Personal Data to us.
- 4.2. In the context of the purposes set out in section 4.1 above, Ferratum Processes the following Personal Data:
 - 4.2.1. identification data (e.g., name, personal identification code, date of birth, place of birth, nationality, information about and copy of identification document, results of face/ID recognition, voice, picture, video, signature, address);
 - 4.2.2. contact data (e.g., address, phone number, e-mail address, language of communication);
 - 4.2.3. bank data (e.g., bank ID, account holder, account number, transaction information from your bank account);
 - 4.2.4. professional data (e.g., current and former employer and position);
 - 4.2.5. financial data (e.g., salary, income, assets, liabilities, properties, tax data);
 - 4.2.6. data concerning origin of assets (e.g., data concerning employer, transaction partners, business

- activities and actual beneficiaries, data showing the source of your income and wealth);
- 4.2.7. data concerning creditworthiness/trustworthiness (e.g., data concerning payment behaviour, damages caused to Ferratum or other persons, data that enables Ferratum to perform the due diligence measures regarding money laundering and terrorist financing prevention and to ensure the compliance with international sanctions);
- 4.2.8. data obtained when performing an obligation arising from the law (e.g., information received from enquiries submitted by investigative bodies, notaries, tax authorities, courts and bailiffs);
- 4.2.9. communications data (e.g., e-mails, phone call recordings); and/or
- 4.2.10. data related to the products and services of Ferratum (e.g., performance of the Contract or the failure thereof, transactions history, submitted applications, requests and complaints).

5. Processing Requirement

- 5.1. The Processing of your Personal Data by Ferratum may be required for statutory purposes as set out in Clause 4.1.4. Ferratum may also require your Personal Data for contractual purposes as set out in Clause 4.1.1. Where the lawful basis of Processing your Personal Data is either statutory or a contractual requirement, failure to provide your Personal Data to Ferratum in either scenario would result in Ferratum being unable to enter into a relationship with you and you would not be able to become a Bondholder.

6. Processing based on consent

- 6.1. Ferratum may also Process your Personal Data based on your consent for direct marketing purposes.
- 6.2. When the Processing is based on your consent, you can withdraw your consent at any time by contacting Ferratum on the contact details provided below in Section 12. Please note that withdrawing your consent does not affect the lawfulness of Processing based on consent before its withdrawal.
- 6.3. As for direct marketing messages received by e-mail, you can also withdraw consent and unsubscribe from receiving any further e-mails by clicking on the 'unsubscribe' link at the end of each e-mail.

7. Automated decision-making and profiling

- 7.1. Your Personal Data will not be used for any decision solely taken on the basis of automated decision-making processes, including profiling, without human intervention.
- 7.2. In the steps leading up to your investment and during our relationship with you, we may collect information from you to, amongst others, comply with our obligations and/or for any other purpose connected with our Contract and/or the performance of our obligations at law. As stated, no automated decision will result from our use of such systems.

8. Disclosing the Personal Data

- 8.1. We may share your Personal Data with third party recipients who are:
 - 8.1.1. selected individuals within the Multitude Group, on a need-to-know basis;
 - 8.1.2. our affiliates and entities forming part of the Multitude Group;
 - 8.1.3. any service providers that may have access to your Personal Data in rendering us with their services, including the security trustee, IT, audit, legal, tax, registered office, company secretarial and accounting service providers;

- 8.1.4. third parties to whom disclosure may be required as a result of your investment in Ferratum;
- 8.1.5. any business partners to whom you may have requested that we transfer your Personal Data;
- 8.1.6. the MSE and the Malta Business Registry;
- 8.1.7. third parties to whom disclosure may be required as a result of legal obligations imposed on us;
- 8.1.8. your beneficiaries, intermediaries, correspondent and agent banks; and
- 8.1.9. as the case may be, appointed Authorised Financial Intermediaries, Administrators, Portfolio Managers, Depositaries, Compliance Officer, Money Laundering Reporting Officer, Prime Brokers and/or Investment Managers respectively (insofar as they may be appointed from time to time), for the collection, storage and processing of Personal Data relating to prospective investors.

9. Transferring Personal Data outside the EEA

- 9.1. Ferratum transfers Personal Data outside of the European Economic Area only where we have a lawful basis to do so, i.e., to a recipient who is: (i) in a country which provides an adequate level of protection for Personal Data; or (ii) under an instrument which covers the European Union requirements for the transfer of Personal Data outside the European Economic Area.

10. Protection of Personal Data

- 10.1. Ferratum endeavours to maintain physical, technical, and procedural safeguards appropriate to the sensitivity of the Personal Data in question. These safeguards are designed to protect your Personal Data from loss and unauthorized access, copying, use, modification, or disclosure. Despite these safeguards, please note that no method of transmission over the internet or data storage is fully secure. Should we be required by law to inform you of a breach to your Personal Data we may notify you electronically, in writing, or by phone.

11. Data retention

- 11.1. Ferratum retains your Personal Data in accordance with industry guidelines for as long as necessary for the purposes for which they were collected, or for as long as necessary to safeguard our rights, or for as long as required by applicable legal acts. Thereafter, your Personal Data shall be immediately and irrevocably destroyed, unless we have a statutory obligation imposed on us, a business need to retain the Personal Data, and/or require the Personal Data to exercise or defend legal claims.
- 11.2. Any Personal Data which we may hold on the basis of your consent shall be retained exclusively until you withdraw your consent.

12. Your rights

- 12.1. To the extent required by applicable Data Protection Regulations, you have all the rights of a Data Subject as regards your Personal Data. This includes the right to:
 - 12.1.1. request access to your Personal Data;
 - 12.1.2. obtain a copy of your Personal Data;
 - 12.1.3. rectify inaccurate or incomplete Personal Data relating to you;
 - 12.1.4. erase your Personal Data;
 - 12.1.5. restrict the Processing of your Personal Data;
 - 12.1.6. portability of your Personal Data;
 - 12.1.7. object to Processing of your Personal Data which is based on your overriding particular

- situation, and which is Processed for direct marketing purposes or in reliance on Ferratum's, or a third party's, legitimate interest;
- 12.1.8. withdraw your consent where our Processing of your Personal Data is based on your consent;
 - 12.1.9. be informed of the source from which your Personal Data originates where the Personal Data we hold about you was not provided to us directly by you;
 - 12.1.10. should you believe that your rights have been violated, you have the right to lodge a complaint with:
 - Ferratum data protection officer at dpo@multitude.com; or
 - The Office of the Information and Data Protection Commissioner, Address: Floor 2, Airways House, Triq Il - Kbirra, Tas-Sliema SLM 1549, phone +356 2328 7100, email idpc.info@idpc.org.mt, website <https://idpc.org.mt/>; or
 - Data Protection Supervisory Authority of your country.
 - 12.2. When requesting access to, or rectification or deletion of, your Personal Data please note that we shall request specific information from you to enable us to confirm your identity and right to access, rectify or delete, as well as to search for and provide you with the Personal Data that we hold about you.
 - 12.3. Kindly note that your right to access, rectify, or delete Personal Data we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse your request. In addition, the Personal Data may have already been destroyed, erased, or made anonymous in accordance with our record retention obligations and practices as described above in Section 11.
 - 12.4. If we cannot provide you with access to, or rectification or deletion of your Personal Data, we will inform you of the reasons why, subject to any legal or regulatory restrictions. We can assure you we will not discriminate you for exercising any of your rights described in these principles.
 - 12.5. To exercise your rights, please contact Ferratum on the contact details above.

13. Where you provide us with Personal Data related to third-party Data Subjects

- 13.1. If you are a trader, intermediary, a company, broker, an authority or other corporate entity, and you supply Personal Data of third-party Data Subjects to us such as your employees, affiliates, service providers, customers or any other individuals connected to your business, you shall be solely responsible to ensure that:
 - 13.1.1. you immediately bring these principles to the attention of such Data Subjects and direct them to it;
 - 13.1.2. the collection, transfer, provision and any Processing of such Personal Data by you fully complies with any applicable laws;
 - 13.1.3. you remain fully liable towards such Data Subjects and shall adhere to the Data Protection Regulations;
 - 13.1.4. you collect any information notices, approval, consents, or other requirements that may be required from such Data Subject before providing us with their Personal Data; and
 - 13.1.5. you remain responsible for making sure that the information you give us is accurate and up to date, and you must tell us if anything changes as soon as possible.
- 13.2. You hereby fully indemnify us and shall render us completely harmless against all costs, damages or liability of whatsoever nature resulting from any claims or litigation (instituted or threatened) against us as a result of your provision of said Personal Data to us.

14. Amending these principles

- 14.1. Should our Personal Data Processing practices change or there shall be a need to amend these principles under the applicable law, case-law or guidelines issued by competent authorities, we are entitled to unilaterally amend these principles at any time. Our most recent principles will always be published on our website, and we urge you to check this at least once a month.

15. Contact

- 15.1. In case you have any question regarding the Processing of your Personal Data by Ferratum or you would like to exercise your rights as a Data Subject, please contact us on the contact details provided above in Section 12.
- 15.2. Ferratum has appointed a data protection officer whom you also may contact regarding the same on the contact details provided above in Section 12.