



Privacy Policy

Finprop Capital – SGOIC, S.A (“**Finprop**”), is an alternative investment fund manager, with head office at Rua Eugénio de Castro, nº352, 1º floor, 4100-225 Porto, and registered with the Commercial Registry of Lisbon under the sole registration and taxpayer number 516546660, authorised and supervised by the Portuguese Securities Market Commission (Comissão do Mercado de Valores Mobiliários) (the “**Company**” or “**Finprop**”), whose majority shareholder is Hipoges Iberia SL (“**Hipoges**”).

Pursuant to article 71.º-B of the General Regime for Collective Investment Undertakings, approved by Law No. 16/2015, of February 24, as currently in force (“**RGOIC**”), Finprop's activity is the management of collective debt and property investment schemes, as defined in article 2, paragraph 1, subparagraph aa) of that law, focusing in particular on the management of alternative credit investment undertakings (“**Credit Funds**” or “**OIAEC**”) and real estate investment undertakings (“**Real Estate Funds**” **Real Estate**”)” or “**OII**”).

As a result of Finprop’s activity, all personal data contained in Finprop’s database(which may include, full name, date and place of birth, nationality, signature, gender, marital status and personal identification number, contacts, as well as details of your credit application, and financial situation) will be treated in accordance with Regulation (EU) 2016/679 and other legislation relating to the Protection of Personal Data.

We inform that Finprop will be responsible for processing your personal data and will will treat your personal data within the scope of its activity (i) manage the investment, perform acts and operations for the successful implementation of the investment policy; (ii) managing property and credit funds.

Personal data is necessary for the proper fulfilment of the contractual relationship between the parties, to maintain contact between the parties and to guarantee the efficiency of our



activity, such as:

- (i) combination of data from other sources to confirm your identity, your contacts and the existence of assets used as collateral (if applicable);
- (iii) assessment of our systems and networks in order to prevent unauthorized access, intrusion or misuse of company systems, including prevention of personal data breach.

We also inform you that the legal basis for the collection and processing of personal data is the need to ensure compliance with the legal obligations to which Finprop is subject and the pursuit of its legitimate interests.

In some cases, Finprop may hire external service providers to perform certain tasks on your behalf, in connection with your credit, if any.

For this, we will share personal data with contracted service providers, to allow them to carry out their tasks in accordance with our instructions.

If any legal proceedings are initiated, we may also share this data with all persons/entities involved in such proceedings, such as lawyers, courts, and other court officials.

We also inform you that personal data may be disclosed and/or transferred to other institutions that are part of the Hipoges Group (located in the European Union, with no international disclosure and/or transfer occurring) in order to optimize Finprop's financial and accounting management. and/or for any other purpose described herein in order to comply with any requirement relating to the concentration of risk, solvency, requirement to demonstrate the existence of capital from own or financed resources or in cases where its disclosure is mandatory by any regulation or applicable law.

Personal data will be kept as long as necessary for the purpose for which it was collected and, where appropriate, until consent is withdrawn. While the right of cancellation is not exercised, your personal data will be kept, with the necessary mandatory security



measures. Once this right is exercised, personal data will be blocked in anonymized form during the limitation period of any liability that may arise as a result of the treatment, making them available only to public entities, regulatory entities and competent courts.

At any time, holders of personal data may exercise their rights of access, rectification, cancellation, opposition, limitation and portability, as well as withdraw consent, by sending an email to the address info@finpropcapital.com, with a copy of card of citizen or equivalent document.

Finally, we also inform you that the interested party has the right to file a complaint with the competent supervisory authority in Portugal, the National Data Protection Commission.