

## PRIVACY POLICY

This policy is intended to describe how DUO Capital, S.A. ("DUO") treats the personal data that is in its charge, either as controller in own cases or as processor, when providing services to its clients, in strict compliance with the General Data Protection Regulation 2016/679 of the European Parliament and the Council ("GDPR").

DUO Capital is an independent company specialized in investment and asset management solutions, founded by professionals with extensive experience in the sector, from the origination and analysis of credit portfolios to asset management and recovery, managing credits and assets of financial and non-financial institutions and entities.

### ▪ THE PROCESSING OF PERSONAL DATA

We process your personal data as Controller in own processes or as a Processor for clients, for the purpose of managing and recovering the Credits of which you are the holder.

In the context of this activity the personal data processed are provided by transferees or collected through external service providers or internally to try to obtain valid and updated contacts to reach the contact with a view to monitoring the process and assist in the out-of-court resolution of the credit process and presentation of all possible solutions for this purpose.

In this context, we make all internal efforts with our analysis tools, in order to have a database with up-to-date and accurate information, with the client having the right to rectification of personal data under the GDPR

### ▪ LAWFULNESS OF THE PROCESSING OF PERSONAL DATA

The processing of personal data carried out by DUO is carried out under the following paragraphs of Article 6(1) of the GDPR:

*“(b) the processing is necessary for the performance of a contract to which the data subject is a party, or for pre-contractual due diligence at the request of the data subject;  
the processing is necessary for the fulfilment of a legal obligation to which the controller is subject;  
(f) the processing is necessary for the purposes of the legitimate interests pursued by the controller or by third parties, unless the interests or fundamental rights and freedoms of the holder which require the protection of personal data prevail, in particular if the data subject is a child.”*

- **SECURITY IN THE PROCESSING OF PERSONAL DATA**

DUO adopts all appropriate technical and organisational measures to ensure the security and inviolability of the personal data processed, also ensuring all appropriate training for all its employees, also developing all its activity and internal procedures in order to ensure the rights of the holders of personal data.

- **SHARING OF PERSONAL DATA WITH THIRD PARTIES**

Personal data are not shared with third parties for other purposes, while the case of official authorities must be disclosed in the context of any ongoing procedure is safeguarded.

In the context of the purpose of credit management and recovery, they may be shared with third parties, and DUO is always obliged to carry out the competent Due diligence, if applicable, ensuring that such entities also take all measures to safeguard personal data, refusing to enter into any contracts or to share personal data with entities that do not guarantee such powers.

For example, data may be shared with Supervisors who are legally obliged to provide information, customers, Subcontractors who provide services to us in the context of the purpose of the processing, Courts, among others.

- **THE RIGHTS OF PERSONAL DATA SUBJECTS**

As the holder of the personal data, you are assisted by the rights provided for in the GDPR with regard to the processing of personal data, in particular:

- a. Right of Access
- b. Right of Rectification
- c. Right to Erasure
- d. Right to Limitation of Treatment
- e. Right of Portability
- f. Right of Opposition
- g. Right to Withdraw Your Consent

For any further clarification in this regard or for the exercise of any of the rights provided for in the GDPR, you can contact us through the following contacts:

In writing, to Av. 5 de Outubro, nº 124, Galeria, 1050-061 Lisbon

Through the website, in the contact form - <https://www.duo-capital.com/>

By email to the address - [dpo@duo-capital.com](mailto:dpo@duo-capital.com)

It may also refer any questions to the competent Supervisory Authority, the National Data Protection Commission to the contacts:

In writing, to Av. D. Carlos I, 134, 1º 1200-651 Lisbon

Through website - [www.cnpd.pt](http://www.cnpd.pt)