# GP - 0090 Privacy Policy

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| Policy Applicable for | Global, ArborKnot Group |
| Policy Owner | Head of Risk & Compliance |
| Policy Version | Version 1.0 |
| Effective Date | 13 October 2026 |
| Document name | Privacy Policy |
| Status | Public |

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## 1. Purpose

ArborKnot is dedicated to protecting our customer privacy and handling their personal information and personal data with the utmost care and respect. ArborKnot is committed to safeguarding your privacy and ensuring that you understand how a customer's personal data is collected, used and shared. This commitment is integral to our operations, from our Board Members, to our employees, and our contracted partners.

This Privacy Policy outlines the arrangements and standards that all ArborKnot entities are expected to comply with.

Personal data is any information or opinion that identifies you or can reasonably identify you. The information or opinion is still defined as personal data even if it is untrue or whether there is a record of it.

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## 2. Scope

This policy applies to:

- All ArborKnot entities (See Appendix A);
- All ArborKnot employees;
- All ArborKnot Board Members; and
- All ArborKnot contracted partners.

This Policy applies whenever you visit our website, any mobile applications that we make available, access to any of our APIs, or us providing you with any of our products and services, including collecting on receivables or other amounts you may owe, providing a platform to manage payment of receivables and other similar amounts and providing services and assistance to help manage your ability to pay your debts and other liabilities, if you become an employee, contractor, agent, vendor or service provider to us or where you otherwise interact or deal with us, including by contacting us, communicating with us or submitting information to us (collectively, the **Services**). The ArborKnot website may contain hyperlinks to third-party websites. We are not responsible for the privacy policies or practices of these third parties. This Privacy Policy must be read in conjunction with other ArborKnot policies including the ArborKnot Credit Reporting Policy, which is available on our website.

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## 3. Objectives

ArborKnot seeks to protect our customers' privacy and handle personal information and data with the utmost care. This Privacy Policy seeks to provide transparency about how we collect, use, store, and share personal information, while enabling customers to make informed decisions about their data.

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## 4. Customer Rights

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*Section 4. Customer Rights* outlines our customers rights under the Privacy Laws, including rights to access, rectify, or erase personal data. A customer's rights include:

(a) Requesting details of personal data we hold about you;
(b) Accessing your personal data;
(c) Requesting corrections or updates;
(d) Requesting erasure of your personal data (subject to exceptions);
(e) Restricting or objecting to processing;
(f) Complaining to a supervisory authority; and
(g) Withdrawing consent where applicable.

A customer can request:

(a) Confirmation of whether their personal data is being processed and can obtain access to their data (subject to a reasonable fee for multiple copies);
(b) Inaccuracies in a customer's personal data be rectified;
(c) Completion of incomplete information; and
(d) Erasure of personal data (under certain conditions subject to certain exclusions).

You may object to direct marketing purposes, and upon objection, processing for this purpose will cease.

ArborKnot may deny access in specific circumstances, such as safety threats, unlawful access, or frivolous requests. If access or rectification is refused, we will provide reasons unless unreasonable to do so.

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## 5. What Personal Data We Collect

The following table outlines the personal data that may be provided to us by our clients for their customers that we service or we may collect from you or your representatives.

| Section | Details |
|---|---|
| Personal and Contact Information: | Name, date of birth, address, phone number, email, social media username or membership in any company or trust. |
| Government Identifiers: | Passport, driver’s license, citizenship, birth certificate, Medicare details, or tax identification numbers or any other identity documents. |
| Document Verification Service (DVS) gateway service provider (DVS Checks) | We may use Government related identifiers and identity documents for verifying your identity and checking with the document issuer or official record holder via a Document Verification Service (DVS) gateway service providers and third party systems for the purpose of confirming your identity. Your personal data, with respect to DVS Checks, will only be used by ArborKnot for verification of your identity and not for any other purpose. If you do not provide your consent, we will need to use |

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| | alternative methods to verify your identity. If we are unable, we may not be able to offer fully our Services. |
| Financial & Personal Circumstances Information: | Occupation, place of work, bank account details, transaction data, income, assets, financial liabilities, financial changes and life events, bank account details, credit card details, credit history, credit capacity, ability to be provided with credit or credit worthiness. |
| Socio-Demographic Information: | Citizenship, age, gender, nationality, relationship status, occupation, dependents and place of work. |
| Digital Information: | IP address, device details, browsing activity, location data (if enabled), signature, photograph, video or audio recording. |
| Sensitive Information: | Biometric data (e.g., fingerprint for authentication), and information about life events. We generally do not collect 'sensitive information' as defined under the Privacy Laws and we further restrict collection of such sensitive information to circumstances where we have obtained your express consent, or a permitted general situation exists (e.g.,GDPR Article 9). |
| Other Information: | Any details shared during your interactions with us, including call recordings and publicly available information. This Policy must be read in conjunction with the ArborKnot Credit Reporting Policy, which is available at our website. |

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## 6. Information We Request

We may request personal data from a Customer in order to undertake the Services. If a customer does not provide the personal data requested by us or our representative, we may not be able to offer our Services, verify your identity, or protect you from fraud.

You may choose to remain anonymous or use a pseudonym when engaging with us. However, to provide most of our Services, we need to timely verify your identity.

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## 7. How We use Your Personal Data

As the owner of a customer's debt we hold the legitimate interest and the right to process personal data (i.e. GDPR Article 6). We use your personal data for the following purposes:

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| Section | Details |
|---|---|
| Providing Services: | We may process your personal information for the following purposes:<br>§ **Debt and Receivables Management**: To facilitate the collection of outstanding receivables or other amounts you may owe, and to provide a platform for managing payments and related financial obligations.<br>§ **Financial Assistance Services**: To offer support and services that help you manage your ability to meet financial commitments, including debts and liabilities.<br>§ **Representatives**: To work with your authorised representatives, including agents or legal proxies, in relation to your account or services.<br>§ **Customer and Partner Engagement**: To service our mutual customers, interact with you as an appointed service provider, and deliver our services effectively.<br>§ **Third-Party Collaboration**: We may also share and process data with our appointed vendors, contractors, and service providers who assist in delivering, maintaining, or improving our Services.<br>§ **Service Improvement and Personalisation**: To enhance user experience, improve our Services, and tailor our offerings to better meet your needs.<br>§ **Marketing and Communications**: To market and promote relevant products and services, and to communicate with you or your authorised representatives regarding updates, offers, and Service-related information. |
| Business Operations: | To handle transactions, respond to inquiries and complaints, arranging for services to be provided by third parties appointed by us, manage risks, to comply with our contractual obligations, facilitating our internal business operations, such as record keeping, data analytics, reporting, quality assurance, auditing, internal governance, training and including the fulfilment of any of our legal and regulatory requirements. |
| Security and Fraud Prevention: | To prevent and investigate fraud, cyberattacks, and unauthorised access. |
| Improving Services: | To review feedback, test new features, and develop better products and services. |
| Compliance with Laws: | To meet our clients or our legal and regulatory responsibilities, such as verifying identity or sharing data with law enforcement. |
| Other: | We may combine your information with other data to understand trends, improve services, and assess risks more effectively. This Policy must be read in conjunction with the ArborKnot Credit Reporting Policy, which is available at our website. |

## 8. De-Identified Information

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ArborKnot, or its contracted partners, may remove identifying details from your personal data for research or analysis purposes. This Policy and Privacy Laws will generally not apply to our use of de-identified information. However, we will continue to safeguard this de-identified information. If this information is later combined with other data that identifies you, it will be treated as personal data.

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## 9. Collecting or Sharing Your Personal Data

From time to time, in order for us to perform the function and/or activities described above, we may collect or share personal data about you with third parties or organisations, as described below. We will ensure the below parties comply with the applicable Privacy Laws and maintain the security of your personal data.

| Section | Details |
|---|---|
| Group Companies or our Affiliates: | Subsidiaries of our related entities and other organisations with whom we have affiliations (if any) to facilitate our and their internal business processes for operational purposes. |
| Other Organisations: | Other organisations, who jointly with us, provide products or services to you or with whom we partner to provide products or services to you. |
| Joint account holders and Guarantors: | Joint account holders or guarantors. |
| To your Authorised Representatives: | When we have been notified of your Authorised Representative, we will disclose your details to them (including your legal adviser, lender, financial adviser, insurer, executor, administrator, guardian, trustee, or attorney). |
| Service Providers: | Contractors, financial institutions, third party service providers who assist us in operating our business (including but not limited to credit reporting bodies, insurers and technology service providers) and these Service Providers may not comply or be required to comply with our Policy that we provide the Services with. |
| Authorities: | Government agencies, regulatory bodies when required by law, government registries, law enforcement bodies in any jurisdiction, credit reporting bodies and public information in public registers. |
| Third Parties: | Our financial advisers, legal advisers, auditors or organisations involved in a corporate re-organisation or involved in a transfer of all or part of the assets or business of our organisation. Organisations involved in the payments systems including financial institutions, merchants and payment organisations. Organisations |

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| | required to assist us discharge our legal requirements (e.g., the 'know your client' requirements under applicable Anti-Money Laundering and Counter Terrorism laws and identification requirements). We may use or disclose your information to comply with our legislative or regulatory requirements in any jurisdiction and to prevent fraud, criminal or other activity that may cause you, us or others harm including in relation to our products or Services. |
| Document Verification Service (DVS) gateway service provider | We may use verification via identity service providers to simplify our customer on-boarding and to verify your identity. With your consent, your personal data will be checked with the document issuer or official record holder via a Document Verification Service (DVS) gateway service provider and third party systems for the purpose of confirming your identity. Your personal data will only be used by ArborKnot for verification of identity and not for any other purpose. |
| Other Circumstances | Where required or authorised by law or we have a public duty to do so, with your express consent, where your consent may be reasonably inferred from the circumstances, or where it is permitted under the Privacy Laws. We may also use or disclose your personal data for a secondary purpose where the use or disclosure is required or authorised by or under law or a court/tribunal order, or if a permitted general situation applies. In accordance with regulatory requirements, and upon your instruction, we will enable the porting of your personal information in accordance with GDPR requirements. |

## 10. Retaining and Deleting your Personal Data

We retain your personal data only for as long as necessary to fulfill its purpose or meet legal requirements. Once no longer needed, we securely destroy or de-identify the data.

If you are located in the European Union, you may ask us to erase your personal data where:

(a) The data is no longer necessary for the purposes for which we collected or processed it;
(b) You withdraw your consent and we have no other legal basis for processing the data;
(c) You object to our processing based on our legitimate interests and there are no overriding legitimate grounds for us to continue, or you object to our processing for direct marketing purposes;
(d) The data has been processed unlawfully;
(e) Erasure is required for us to comply with a legal obligation; or
(f) The data was collected in connection with an online service offered to you when you were a child.

We may decline to erase data where we need to keep it to comply with a legal obligation, to establish, exercise or defend legal claims, or for another reason permitted by law. If we decline, we will tell you why. Where we have

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made your data public or shared it with others, we will take reasonable steps to inform them of your erasure request.

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## 11. Security of your Personal Data

Much of the information ArborKnot holds about you will be stored electronically. We store some of your information in secure data centres that are located in Australia. We also store information in data centres of our contracted service providers (including cloud storage providers), and some of these data centres may be located outside of Australia. Some information we hold about you may be stored in paper files. We use a range of physical, electronic and other security measures to protect the security, confidentiality and integrity of the personal data we hold both in Australia and overseas.

We use technical and organisational measures to protect your personal data. This includes:

(a) Storing data in secure locations (both physical and digital);
(b) Limiting access to authorised individuals and having in place identity and access management controls;
(c) Employees and our contracted service providers are bound by internal information security policies and are required to keep information secure;
(d) Regular training for employees on privacy and security practices; and
(e) We regularly monitor and review our compliance with internal policies and industry best practice.

The security of your personal data is important to us. We take reasonable measures to ensure that your personal data is stored safely to protect it from misuse, loss, unauthorised access, modification or disclosure, including electronic and physical security measures. Despite our precautions, sending unencrypted data online carries risks. You are responsible for keeping your passwords secure. We cannot ensure the security of any information that you transmit to us over the internet and you do so at your own risk. Our website links to external websites and we take no responsibility for the privacy practices or the content of these other sites.  We will not sell your personal data to other companies or organisations without your prior consent.

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## 12. Sharing Information with Overseas Recipients

### 12.1 Overseas Recipients

We may share your information with trusted service providers located overseas. Before sharing, we take steps to ensure these providers comply with the applicable Privacy Laws and secure your data. Prior to disclosing your personal data to an overseas recipient, unless a permitted general situation applies, we will take all reasonable steps to ensure that:

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(a) The overseas recipient does not breach the Privacy Laws;
(b) The overseas recipient is subject to a law, or binding scheme, that has the effect of protecting the information in a way that, overall, is at least substantially similar to the way the Privacy Laws protect the information; or
(c) You have consented to us making the disclosure.

**12.2 Global Locations**

Currently we are handling, storing, and processing personal information in the following locations where ArborKnot provides Services including in Australia, Europe, Israel, and the United Kingdom. The locations where ArborKnot handles, stores and processes your personal information may change as our business needs change and we appoint other service providers from time to time. ArborKnot will update this Privacy Policy to reflect any material changes to the jurisdictions in which we handle, store and process your personal information. When we make onwards transfers of your personal information outside the European Economic Area, we ensure it benefits from an adequate level of data protection by:

(a) Relying on European Commission adequacy decisions under Article 45 of the GDPR, finding that the third country to which the information is being transferred offers an adequate level of protection; or
(b) Using European Commission approved standard contractual clauses under Article 46(2) of the GDPR for the information to all other third countries.

For further information on international data transfer and the mechanisms we adopted to safeguard your personal information, please contact us by using the contact details disclosed in this Policy.

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## 13. Automated Decision Making

ArborKnot does not engage in automated processing for decision-making purposes. This means that we do not make decisions based solely on automated processing (e.g., Automated Credit Scoring), including profiling, that would significantly impact your legal rights or similarly affect you. All significant decisions, involving your data, are reviewed and made by humans to ensure transparency, fairness, and accountability in our processes.

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## 14. AI and Data Privacy

ArborKnot may use AI and Large Language Models (LLMs), and includes AI and LLMs in its Privacy Impact Assessment process to fully understand the risks and data usage involved in these systems. Where AI systems process personal data, ArborKnot restricts AI use to systems governed by strict agreements, ensuring that any AI data processing involving personal data is not shared with other customers or third parties and is not used to train models outside the organisation's control, and remains within the control of ArborKnot at all times.

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## 15. Data Breach Notification Obligations

ArborKnot are committed to protecting personal information and complying with applicable data protection laws in the jurisdictions where we operate. In the event of a data breach involving personal information, we will assess the nature and impact of the breach and, where required by law, notify the relevant authorities and affected individuals. Depending on the applicable legal framework, our obligations may include:

**(a) Australia (Privacy Act 1988 & Notifiable Data Breaches Scheme)**: If a breach is likely to result in serious harm, we will notify the affected individuals and the Office of the Australian Information Commissioner (OAIC) as soon as practicable.

**(b) European Union (GDPR)**: We will notify the relevant supervisory authority within 72 hours of becoming aware of a personal data breach, unless the breach is unlikely to result in a risk to individuals' rights and freedoms. If the breach poses a high risk, we will also notify affected individuals without undue delay.

**(c) Israel (Protection of Privacy Law & Data Security Regulations)**: In the case of a Severe Security Incident, we will notify the Israeli Privacy Protection Authority (PPA) and, if required, the affected individuals. Notification may be required even when there is a concern about the existence of such an incident.

We will provide all required information in our notifications, including the nature of the breach, the categories of affected data, potential consequences, and the measures taken to mitigate harm. Where permitted, we may issue public notices if individual notification is impracticable.

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## 16. Your Rights

In *Section 16. Your Rights*, we have summarised the rights that you have under the Privacy Laws. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you must read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights, and not singularly rely on this summary. The summary of your principal rights under Privacy Laws are:

(a) To request, at any time, for us to inform you of the personal data we hold about you;
(b) The right to access;
(c) The right to rectification;
(d) The right to erasure (where we have no legitimate right or business requirements to retain your personal data);
(e) The right to restrict or object to processing (where we have no legitimate right or business requirements to retain your personal data);
(f) The right to complain to a supervisory authority;
(g) The right to withdraw your consent (where we have no legitimate right or business requirements to retain your personal data); and

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(h) For Direct Marketing, the right to request where we got your personal information from, when we used or disclosed for direct marketing purposes. Each request will be processed in accordance with your local regulatory requirements.

You have the right to confirm as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed. If we refuse your request to correct your personal data, you also have the right to request that a statement be associated with your personal data noting that you disagree with its accuracy.

We may refuse to give you access to the personal data we hold about you if we reasonably believe that giving access would pose a serious threat to the life, health or safety of an individual, or to public health or safety, where giving access would be unlawful, where giving access would have an unreasonable impact on the privacy of other individuals, or if we consider the request to be frivolous or vexatious.
If we refuse to give you access to or to correct your personal data, we will give you a notice explaining our reasons except where it would be unreasonable to do so.

However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary for us to provide any products or services to you, for compliance with our legal and regulatory obligations, attend to any complaints made by you or for the establishment, exercise or defence of legal claims.

You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose. ArborKnot will not use for marketing purposes your Government related identifiers and identity documents and any results from checking your personal data with the document issuer or official record holder via a Document Verification Service (DVS) gateway service provider and third party systems for the purpose of confirming your identity.

In certain jurisdictions (e.g., Spain) and under certain circumstances, you may request your personal information be passed legitimately to another data controller. We will endeavour to respond timely, and supply your data in a structured machine readable format per your request.

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## 17. Making a Privacy Complaint

If dissatisfied with how your personal data is handled, you can lodge a complaint directly with us, or with our representative. ArborKnot can be reached on the contact details provided later in this Privacy Policy. Complaints can be addressed to the Complaints Officer via email or the complaints page on our website at

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www.arborknot.com. Upon receiving a complaint, we will confirm receipt and provide details of the person managing your complaint. We will investigate and propose a fair resolution, potentially requesting additional information. A final response will typically be provided within 30 days, but this does not limit your ability to lodge a complaint with the respective regulatory body. If dissatisfied with our resolution, you are entitled to escalate your complaint to the relevant regulatory body. Notably:

1) For **Australian residents**, the Office of the Australian Information Commissioner (OAIC) contact details are provided for below if you wish to lodge a privacy complain:

Office of the Australian Information Commissioner
Phone: 1300 363 992
Email: enquiries@oaic.gov.au
Website: www.oaic.gov.au
Mail: GPO Box 5218, Sydney NSW 2001

In Australia, you may lodge a complaint with regulators even if we are considering, investigating or resolving a complaint already lodged with us.

2) For **Spanish residents**, the Spanish Data Protection Authority (Agencia Española de Protección de Datos – AEPD) is the national regulator responsible for enforcing privacy laws in Spain, including the GDPR and Spain's Organic Law 3/2018.

Contact Details for Privacy Complaints:
Address: Calle Jorge Juan, 6 28001 Madrid, Spain
Phone: +34 901 100 099; +34 91 266 35 17
Website: www.aepd.es

In Spain, you can submit complaints directly through AEPDs website or contact them for guidance on how to proceed with a privacy-related issue. Additionally, you may lodge a complaint at any time regardless of the timing or status of a complaint lodged directly with ArborKnot that is currently subject to investigation.

3) For **Israeli residents**, the Israeli Privacy Protection Authority (PPA), which handles privacy complaints and enforcement under the Privacy Protection Law:

Privacy Protection Authority (PPA)
Address: Tel Aviv Government Complex P.O. BOX 33503 Tel Aviv 6133401,
Phone: *3103 (from within Israel) +972 3-7634050 (international)
Email: ppa@justice.gov.il
Website: Submit a complaint or inquiry via https://www.gov.il/en/pages/public_inquiries_ilita 17.

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## 18. Cookies

Cookies are files stored by web browsers, enabling servers to recognize browsers during visits. Cookies can be either persistent or session-based, with different durations and purposes. While cookies do not typically identify

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users, personal data stored may be linked to cookie data. When using our website, we may use either persistent cookies or session cookies. Cookies contain a sequence of numbers that our web server transmits to your web browser, for which it is then stored. Cookies don't typically contain any personal information about you, however the personal information we hold about you may be linked to the information stored in and retrieved from cookies. Our Cookies Policy is available on request per the contact details later in this Privacy Policy.

**18.1 Cookies We Use**

ArborKnot uses Cookies for various purposes, such as:

(a) Authentication and session management;
(b) Application state maintenance;
(c) Personalisation;
(d) Security;
(e) Advertising relevance;
(f) Performance analysis; and
(g) Storing cookie preferences.

**18.2 Cookies Used by Service Providers**

Service providers may use cookies on our website. Google Analytics gathers data on website use via cookies to generate reports. Google AdSense may track user interests for tailored advertisements, with opt-out options provided.

**18.3 Managing Cookies**

Most browsers allow users to block or delete cookies, with links provided for browser-specific guidance. Blocking cookies may negatively impact website usability. Certain website features may not work if cookies are blocked.

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## 19. Contacting ArborKnot

ArborKnot has appointed a Data Protection Officer (DPO) to oversee compliance with applicable data protection laws, including GDPR and Spain's Ley Organica 3/2018, and to act as a point of contact for data subjects and supervisory authorities, including the Agencia Espanola de Proteccion de Dataos (AEPD).

Contact details for our current Privacy Officer or Data Privacy Officer, in each location, is available by emailing us at info@arborknot.io Contact can be made in writing via the contact details on our website at www.arborknot.com, or via email to the Privacy Officer at info@arborknot.io or for Australian customers, please call on 1300 397 709.

The website is owned and operated by ArborKnot under New South Wales, Australia laws.

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## Appendix 1 - Legal Entity Listing

ArborKnot or ArborKnot Group includes the following legal entities:

- Arbor Knot Holdings Pty Ltd;
- Arbor Knot Ltd;
- AKCP Management 2 Pty Ltd;
- ArborKnot Management Inc;
- Arbor Knot Inc;
- Arbor Knot Gmbh;
- AKCP Management Pty Ltd;
- AKCP Nominees Pty Ltd;
- AKCP Holdings Pty Ltd;
- AKCP Nominees 2 Pty Ltd;
- AKCP Nominees 3 Pty Ltd;
- AKCP SARL (formerly LC Lite Management S.à.r.l.), and
- AKCP Europe SCsP (formerly LC Lite Investment Fund SCSp).

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**Appendix – 2 - Policy Change Log**

| Policy Version | Policy Owner | Date of Approval | Summary of Key Changes Made: |
|---|---|---|---|
| 1.0 | Head of Risk & Compliance - Adam Riddett | 13 October 2026 | Policy Approval for ArborKnot Framework |

Changes in Policy Owner are expected to be captured in the above, although does not need to be referenced as a new Policy version.

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