

Notice: This document has been translated using DeepL and is intended as an aid. Therefore, no guarantee can be given for content or legal errors.

Only the German-language document is legally binding.

SCHUFA INFORMATION ACCORDING TO ART. 14 GDPR

1. NAME AND CONTACT DETAILS OF THE CONTROLLER AND THE COMPANY DATA PROTECTION OFFICER

SCHUFA Holding AG, Kormoranweg 5, 65201 Wiesbaden, Germany, Phone: +49 (0) 6 11-92 78 0

SCHUFA's company data protection officer can be contacted at the above address, Attn: Data Protection Department or by e-mail at datenschutz@schufa.de.

2. DATA PROCESSING BY SCHUFA

2.1 Purposes of data processing and legitimate interests pursued by SCHUFA or a third party

SCHUFA processes personal data in order to provide authorized recipients with information to assess the creditworthiness of natural and legal persons and legal entities. Score values are also determined and transmitted for this purpose. It only makes the information available if a legitimate interest in this has been credibly demonstrated in the individual case and processing is permissible after weighing up all interests. The legitimate interest is given in particular before entering into transactions with a financial default risk. The creditworthiness check serves to protect recipients from losses in the lending business and at the same time opens up the possibility of protecting borrowers from excessive indebtedness by providing advice. excessive indebtedness through advice. The data is also processed to prevent fraud, check creditworthiness and prevent money laundering, identity and age verification, address verification, customer care or risk management as well as pricing or conditioning. In addition to the aforementioned purposes, SCHUFA also processes personal data for internal purposes (e.g. assertion of legal claims and defense in legal disputes). claims and defense in the event of legal disputes, further development of services and products, research and development in particular for the implementation of internal research projects (e.g. SCHUFA Credit Compass) or for participation in national and international external research projects in

the area of the aforementioned processing purposes and ensuring IT security and IT operations). The legitimate interest in this arises from the respective purposes and is otherwise of an economic nature (efficient fulfillment of tasks, avoidance of legal risks).of legal risks). Anonymized data may also be processed. Any changes to the purposes of data processing SCHUFA will inform you in accordance with Art. 14 para. 4 GDPR.

2.2 Legal basis for data processing

SCHUFA processes personal data on the basis of the provisions of the General Data Protection Regulation and the Federal Data Protection Act. Processing takes place on the basis of consent (Art. 6 para. 1 letter a GDPR) and on the basis of Art. 6 para. 1 (f) GDPR, insofar as the processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party and is not overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data. Consent can be revoked at any time vis-à-vis the contractual partner concerned. This also applies to consents that were already granted before the GDPR came into force. The revocation of consent does not affect the legality of the personal data processed until the revocation. personal data processed until the revocation.

2.3 Origin of the data

SCHUFA receives its data from its contractual partners. These are in the European Economic Area and in Switzerland and, if applicable third countries (insofar as a corresponding adequacy decision by the European Commission exists or standard contractual clauses have been have been agreed, which can be viewed at www.schufa.de), financial institutions, financial companies and payment service providers that bear a financial default risk (e.g. banks, savings banks, cooperative banks, credit card, factoring and leasing companies) as well as other contractual partners who use SCHUFA products for the purposes mentioned in section 2.1, in particular from the (mail order) trade, e-commerce, service, rental, energy supply, telecommunications, insurance or debt collection sectors. In addition, SCHUFA processes information from generally accessible sources such as public directories and official (e.g. debtor directories, insolvency announcements) or from compliance lists (e.g. lists of politically exposed persons and sanctions lists) as well as from persons and sanctions lists) and from data suppliers. SCHUFA may also store personal data of the data subjects after corresponding notification and verification. notification and verification.

2.4 Categories of personal data that are processed

Personal data, e.g. surname (including previous names, if applicable, which are provided upon separate request), first name, date of birth, place of birth, address, previous addresses

| Information on the commencement and contractual execution of a transaction (e.g. current accounts, installment loans, credit cards, seizure protection accounts), credit cards, seizure protection accounts, basic accounts) | Information on unfulfilled payment obligations, e.g. undisputed, overdue and multiple reminders due and multiple reminders or enforceable claims and their settlement | Information on abusive or other fraudulent behavior such as identity theft information from generally accessible sources (e.g. debtor directories, data from compliance lists | information on whether and in what capacity an entry on a public figure has been made in publicly accessible sources an entry exists for a public figure with matching personal data | address data | score values

2.5 Categories of recipients of the personal data

Recipients are in the European Economic Area, Switzerland and, if applicable, other third countries (provided that a corresponding adequacy decision of the European Commission exists or standard contractual clauses have been agreed, which can be viewed at www.schufa.de. contractual partners in accordance with section 2.3. Other recipients may be external contractors of SCHUFA in accordance with Art. 28 GDPR as well as external and internal SCHUFA offices. SCHUFA is also subject to the statutory powers of intervention of state authorities.

2.6 Duration of data storage

SCHUFA only stores information about individuals for a certain period of time. The decisive criterion for determining this duration is the necessity of processing for the above-mentioned purposes. The storage periods are set out in detail in the association's Code of Conduct "Die Wirtschaftsauskunfteien e. V." association. This and further details on our deletion periods can be found at www.schufa.de/loeschfristen can be viewed.

3. RIGHTS OF DATA SUBJECTS

Every data subject has the right of access to SCHUFA pursuant to Art. 15 GDPR, the right to rectification pursuant to Art. 16 GDPR, the right to erasure pursuant to Art. 17 GDPR and the right to restriction of processing pursuant to Art. 18 GDPR. GDPR, the right to erasure pursuant to Art. 17 GDPR and the right to restriction of processing pursuant to Art. 18 GDPR. SCHUFA has set up a Private Customer ServiceCenter for the concerns of data subjects, which can be contacted in writing at SCHUFA Holding AG, Privatkunden ServiceCenter, P.O. Box 10 34 41, 50474 Cologne, by telephone at +49 (0) 6 11-92 78 0 and via a query form at www.schufa.de/rueckfrageformular can be contacted. In addition, it is possible to contact the supervisory authority responsible for SCHUFA, the Hessian Commissioner for Data

Protection and Freedom of Information. Consent can be revoked at any time vis-à-vis the contractual partner concerned. be revoked at any time.

According to Art. 21 para. 1 GDPR, data processing can be objected to for reasons arising from the particular situation of the data subject.

The right to object also applies to the profiling described below.

The objection can be made informally and sent, for example, to SCHUFA Holding AG,
Privatkunden ServiceCenter,
P.O. Box 10 34 41, 50474 Cologne, Germany.

4. PROFILING (SCORING)

In addition to providing information about the information stored about a person, SCHUFA supports its contractual partners by profiling, in particular by means of so-called score values. The generic term profiling refers to the processing of personal data by analyzing certain aspects of a person. understood. Scoring is of particular importance in the context of credit checks and fraud prevention. Scoring can also serve to fulfill other purposes mentioned in section 2.1 of this SCHUFA information. Scoring is based on a forecast of future events or behavior based on collected information and past experience. created. Based on the information stored about a person at SCHUFA, an assignment is made to statistical groups of persons, which had a similar database in the past. In addition to the logistic regression procedure, which has been established for many years in the area of credit scoring, SCHUFA can also use scoring procedures from the SCHUFA can also use scoring procedures from the areas of so-called complex non-linear procedures or expert based procedures.

It is always of particular importance to SCHUFA that the methods used are mathematically and statistically recognized and scientifically sound. scientifically sound. Independent external experts confirm the scientific nature of these procedures. In addition, the procedures used are disclosed to the responsible supervisory authority. It is a matter of course for SCHUFA to regularly check the quality and up-to-dateness of the procedures used and to update them accordingly. SCHUFA determines creditworthiness scores on the basis of the data stored about a person at SCHUFA, which are also shown in the data copy in accordance with Art. 15 GDPR. On the basis of this information stored at SCHUFA, an assignment to statistical assigned to statistical groups of persons who have had a similar database in the past. To determine score values for creditworthiness creditworthiness, the stored data is summarized in so-called data types, which can be viewed at www.schufa.de/scoring-faq. When determining score values for other purposes, other data

(types) may also be included. Information on nationality or particularly sensitive data in accordance with Art. 9 GDPR (e.g. ethnic origin or information on political or religious views) are not stored at SCHUFA and are therefore not available for profiling. The assertion of the rights of the data subject under the GDPR, such as access to the personal data stored by SCHUFA in accordance with Art. 15 GDPR, has no influence on the profiling. In addition, SCHUFA takes into account the provisions of Section 31 BDSG when scoring. The probability with which a person will repay a mortgage loan, for example, does not necessarily correspond to the probability with which they will pay a mail order invoice on time. For this reason, SCHUFA offers its contractual partners different industry-specific or even customer-specific score models. Score values are constantly changing, as the data stored at SCHUFA is also constantly changing. New data is added, while other data is deleted due to storage periods. In addition the data itself also changes over time (e.g. the duration of the existence of a business relationship), so that changes can occur even without new data. Important to know: SCHUFA itself does not make any decisions. It merely supports the affiliated contractual partners with information and profiling in their risk management. The decision for or against a transaction is made solely by the direct business partner. If a contractual partner relies significantly on SCHUFA's scoring when deciding on the establishment, execution or termination of a contractual relationship on SCHUFA's scoring, the provisions of Art. 22 GDPR also apply. In this case, SCHUFA scoring can, for example, help to process everyday credit transactions quickly; however, it may also lead to a contractual a contracting party to make a negative, possibly negative decision on the establishment, execution or termination of a contractual relationship. Further information on how a contractual partner uses SCHUFA scoring can be obtained from the respective contractual partner. Further information on profiling and scoring at SCHUFA (e.g. on the procedures currently in use) can be viewed at www.schufa.de/scoring-faq.

Status: December 2023