

SCHUFA Information Sheet

SCHUFA information according to Art. 14 GDPR

1. Name and contact details of the responsible body and the company data protection officer:

SCHUFA Holding AG, Kormoranweg 5, 65201 Wiesbaden, Tel.: +49 611 9278-0

The SCHUFA data protection officer can be contacted at the above address, at the address of the 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 authorised recipients with information for assessing the creditworthiness of natural persons and legal entities. Score values are also calculated and transmitted for this purpose. It only provides the information if the consent of the data subject or a justified 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 credit check serves to protect recipients from losses in the credit business and at the same time opens up the possibility of protecting borrowers from excessive indebtedness through counselling. The data is also processed for the purposes of fraud prevention, credit checks, money laundering prevention, identity and age checks, address verification, customer care or risk management as well as pricing or conditioning. SCHUFA will inform about any changes in the purposes of data processing in accordance with Art. 14 (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 (GDPR). The processing is carried out on the basis of consents pursuant to Art. 6 (1) (a) GDPR as well as on the basis of Art. 6 (1) (f) GDPR, insofar as the processing is necessary to protect the legitimate interests of the controller or a third party and the interests or fundamental rights and freedoms of the data subject, which require the protection of personal data, are not overridden. Consents can be revoked at any time by sending an e-mail to support@holvi.com. This also applies to consents already granted before the entry

into force of the GDPR. The revocation of consent does not affect the lawfulness of the personal data processed until the revocation.

2.3. Origin of the data

SCHUFA receives its data from its contractual partners. These are institutions, financial companies and payment service providers domiciled in the European Economic Area and in Switzerland and, where applicable, other third countries (insofar as a corresponding adequacy decision of the European Commission exists for these), which 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 collection sectors. In addition, the SCHUFA processes information from generally accessible sources such as public directories and official announcements (debtor directories, insolvency announcements).

2.4. Categories of personal data processed (personal data, payment history and contract compliance)

- Personal data, e.g. surname (if applicable also previous names that are provided with information upon separate application), first name, date of birth, place of birth, address, previous addresses;
- Information on the commencement and contractual performance of a transaction (e.g. current account, instalment loans, credit cards, garnishment protection accounts, basic accounts);
- Information on undisputed, due and multiple reminded or titled claims as well as their settlement;
- Information on abusive or other fraudulent behaviour such as identity or credit rating deception;
- Information from public directories and official notices;
- Score values.

2.5. Categories of recipients of the personal data

Recipients are contractual partners located in the European Economic Area, in Switzerland and, if applicable, in other third countries (insofar as a corresponding adequacy decision of the European Commission exists for these) in accordance with section 2.3. Other recipients may be external contractors of SCHUFA in accordance with Art. 28 of the GDPR as well as external and internal SCHUFA offices. The 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 period is the necessity. The SCHUFA has set standard periods for checking the necessity of further storage or the deletion of personal data. According to these, the basic storage period for personal data is three years to the day after the data has been processed. Deviating from this, e.g. are deleted:

- Information on enquiries after twelve months to the day;
- Information on trouble-free contract data on accounts which are documented without the claim justified thereby (e.g. current accounts, credit cards, telecommunication accounts or energy accounts), information on contracts for which the evidence check is provided for by law (e.g. seizure protection accounts, basic accounts) as well as guarantees and commercial accounts which are kept on the credit side, immediately after notification of termination;
- Data from the debtors' registers of the central enforcement courts after three years to the day, but earlier if SCHUFA is provided with verification of a deletion by the central enforcement court;
- Information on consumer/insolvency proceedings or residual debt discharge proceedings to the day three years after termination of the insolvency proceedings or granting of residual debt discharge. In special individual cases, an earlier deletion may also take place;
- Information on the rejection of an insolvency petition due to insufficient assets, the cancellation of protective measures or the refusal of residual debt discharge shall be deleted on a daily basis after three years;
- Personal previous addresses shall remain stored for three years with exact dates; thereafter, the necessity of continued storage shall be reviewed for a further three years. Afterwards, they are deleted on a daily basis, unless longer storage is required for identification purposes.

3. **Data subjects' rights**

Every data subject has the right to information from the SCHUFA pursuant to Art. 15 GDPR, the right to rectification pursuant to Art. 16 GDPR, the right to deletion pursuant to Art. 17 GDPR and the right to restriction of processing pursuant to Art. 18 GDPR. The SCHUFA has a Private Client Service Centre, P.O. Box 10 34 41, 50474 Cologne, which can be contacted by telephone on +49 (0) 6 11- 92 78 0 and via an Internet form at www.schufa.de. The SCHUFA also offers the possibility of contacting the SCHUFA. In addition, there is the possibility of contacting the supervisory authority responsible for SCHUFA, the Hessian Data Protection Commissioner. Consent can be revoked at any time by sending an e-mail to support@holvi.com.

According to Art. 21 (1) GDPR, the processing of data may be objected to for reasons arising from the particular situation of the data subject. The objection can be made without any formalities and should be addressed to SCHUFA Holding AG, Privatkunden ServiceCenter, Postfach 10 34 41, 50474 Cologne.

4. Profiling (Scoring)

The SCHUFA information can be supplemented with so-called score values. Scoring involves using information and experience gathered in the past to make a forecast of future events. The SCHUFA calculates all score values on the basis of the information stored about a data subject at the SCHUFA, which is also shown in the information pursuant to Article 15 of the GDPR. In addition, SCHUFA takes into account the provisions of § 31 BDSG when scoring. Based on the entries stored for a person, an assignment is made to statistical groups of persons who had similar entries in the past. The procedure used is called "logistic regression" and is a well-founded mathematical-statistical method for forecasting risk probabilities that has been tried and tested in practice for a long time. The following types of data are used by SCHUFA for the score calculation, whereby not every type of data is also included in every individual score calculation: General data (e.g. date of birth, gender or number of addresses used in business transactions), previous payment problems, credit activity last year, credit utilisation, length of credit history as well as address data (only if little personal credit-relevant information is available). Certain information is neither stored nor taken into account in the calculation of score values, e.g. information on nationality or special categories of personal data such as ethnic origin or information on political or religious attitudes in accordance with Art. 9 GDPR. The assertion of rights according to the GDPR, e.g. the inspection of the information stored at SCHUFA according to Art. 15 GDPR, also has no influence on the score calculation. The transmitted score values support the contractual partners in decision-making and are included in risk management there. The risk assessment and evaluation of creditworthiness is carried out solely by the direct business partner, as only the latter has access to a great deal of additional information - for example from a credit application. This applies even if he relies solely on the information and score values provided by SCHUFA. Further information on credit scoring or the recognition of conspicuous circumstances is available at www.scoring-wissen.de.