



Information according to Art. 14 GDPR of CRIF Bürgel GmbH regarding the credit bureau and information services

1. Name and contact data of the responsible office as well as of the company's data protection officer

CRIF Bürgel GmbH, Leopoldstr. 244, 80807 Munich, Tel.: +49 40 89803-0

The data protection officer of CRIF Bürgel GmbH can be reached at the above address ("For the attention of Data Protection Department"), or by e-mail at: datenschutz@crifbuergel.de.

2. Data processing by CRIF Bürgel GmbH

2.1 Purposes of data processing and valid interests that are pursued by CRIF Bürgel GmbH or a third party

CRIF Bürgel GmbH processes personal data in order to provide authorized recipients with information for assessment of the creditworthiness of individuals and legal entities. To this end, scores are also calculated and transferred. CRIF Bürgel GmbH makes the information available only if a legitimate interest in it has been credibly demonstrated and processing is permissible after consideration of all interests. There is a legitimate interest especially before engagement in business transactions involving a risk of financial default. The purpose of the creditworthiness check is to protect recipients against losses in credit business. The check simultaneously makes it possible to advise borrowers in order to protect them against excessive indebtedness. Data are also processed for purposes of fraud prevention, money laundering prevention, integrity assessment, identity and age verification, address location, customer service or risk management as well as tariff classification and assessing conditions and engage in direct product marketing. Pursuant to Art. 14 (4) GDPR, CRIF Bürgel GmbH will provide information regarding any changes to the purposes for which it processes data.

2.2 Legal basis of data processing

CRIF Bürgel GmbH processes personal data based on the stipulations of the EU General Data Protection Regulation. Processing is carried out based on consent and Art. 6 Para. 1 Letter f GDPR, in so far as such processing is necessary in order to preserve the legitimate interests of the responsible person (controller) or a third party, and these interests do not outweigh the basic rights and basic freedoms of the person in question that require the protection of personal data. There is a legitimate interest especially before any business transactions involving a risk of financial default. Consent can be withdrawn from the contracting partner at any time. This also applies to consent already given before GDPR came into force. A withdrawal of consent does not affect the legality of the personal data processed before the withdrawal.

2.3 Data sources

CRIF Bürgel GmbH obtains its data from its contracting partners. These are companies located in the European Economic Area or in Switzerland in the areas of trade, service provision, leasing, energy supply, telecommunications, insurance or debt collection as well as credit institutes, providers of financial and payment services and other contracting partners that use products of CRIF

Bürgel GmbH for the purposes indicated in Section 2.1. In addition, CRIF Bürgel GmbH processes information from generally accessible sources such as public records and official announcements (commercial registers, debtor lists, bankruptcy declarations).

2.4 Categories of personal data that are processed

- Personal data, e.g. surname (if applicable prior names that may be provided upon special request), given name, date of birth, place of birth, address, prior addresses
- Information regarding the initiation and execution of a transaction in accordance with the contract (e.g. Giro accounts, instalment loans, credit cards, garnishment-exempt accounts, basic accounts)
- Information regarding undisputed, past-due claims subject to repeated dunning or reduced to judgement and their resolution
- Information regarding abusive or otherwise fraudulent activities such as identity theft or credit rating
- Information from public registries and official publications
- Scores
- Probabilistic values

2.5 Categories of recipients of personal data

Recipients are contracting partners of the branches of industry and commerce indicated in Section 2.3. In countries outside the European Economic Area, data are transmitted according to the requirements of the European Commission. We may transfer your personal data to EURO-PRO Gesellschaft für Data Processing mbH, Lindenhof 1-3, D-61279 Grävenwiesbach (EURO-PRO) for the purpose of address identification. The legal basis for these transmissions is article 6 paragraph 1 lit. f DSGVO. EURO-PRO processes the data received and also uses them to provide its contractual partners in the European Economic Area and in Switzerland as well as other third countries (under the precondition that there is a decision on adequacy by the European Commission) with address information of natural persons. More detailed information on the activities of EURO-PRO can be found in the EURO-PRO information sheet or online at www.euro-pro.de/datenschutz.

Further recipients can be agents of CRIF Bürgel GmbH in accordance with Art. 28 GDPR.

2.6 Duration of data storage

CRIF Bürgel GmbH stores information on persons only for a certain length of time. Necessity is the primary criterion for how long this time is. The storage periods are indicated in a Code of Conduct of the association "Die Wirtschaftsauskunfteien e. V.". The code can be viewed on the Internet at www.crifbuergel.de/de/datenschutz. According to this code, the basic storage duration of data relating to a person is three years to the day after the person's debt has been settled. The following information, for example, is different to this and is deleted:

- Data from debtor lists/records of central courts competent for execution are deleted after three years to the day, but are deleted prematurely if it is verified

to CRIF Bürgel GmbH that the data have been deleted by the central court competent for execution.

- Information on consumer/bankruptcy proceedings or proceedings for the discharge of residual debt is deleted exactly three years to the day after completion of the bankruptcy proceedings or discharge from residual debt. In special individual cases, earlier deletion is also possible.
- Information on the rejection of a bankruptcy application for lack of assets, the cancellation of stipulations imposed regarding the provision of collateral or the disallowance of discharge of residual debt is deleted after three years to the day.
- Previous addresses are stored for exactly three years to the day. After this, a check is made to find out whether it is necessary to continue storing the data for a further three years. Following this, they are deleted to the day exactly unless longer storage is necessary for the purpose of identification.

3. Rights of the data subject

In relation to CRIF Bürgel GmbH, every person concerned has the right to information according Art. 15 GDPR, the right to correction according to Art. 16 GDPR, the right to deletion according to Art. 17 GDPR and the right to limitation of data processing according Art. 18 GDPR. Moreover, persons concerned have recourse to the supervisory authority that is responsible for CRIF Bürgel GmbH, namely the Bavarian Data Protection Authority. Consent can be withdrawn from the contracting partner in question at any time.

According to Art. 21 (1) GDPR, it is possible to object to data processing for reasons arising from the special situation of the person concerned (for example witness protection, women's shelter). The objection can be made informally and is to be addressed to CRIF Bürgel GmbH, Data Protection, Leopoldstr. 244, 80807 Munich.

4. Profile development (scoring)

Before any business transactions involving a financial risk, business partners would like to be able to estimate as reliably as possible whether the obligations to pay can be fulfilled. By providing information and by means of so-called probability values (scores), CRIF Bürgel GmbH helps companies to make decisions and to quickly process everyday credit transactions. Based on collected information and experience from the past, a prognosis is made of future events. At CRIF Bürgel GmbH, probability values are primarily calculated based on the information on a person that CRIF Bürgel GmbH has stored and that can be shown in future as part of the information provided in accordance with Article 15 GDPR. In addition, address data are used. Based on the stored entries relating to a person and the other data, the person is assigned to statistical groups of people who have demonstrated similar payment behavior in the past. The method used is called "logistic regression" and is a solidly based, field-tested, statistical method that is used to forecast risk probabilities. CRIF Bürgel GmbH uses the following data to calculate scores, whereby not every kind of data is used for every individual score calculation: date of birth, sex, shopping basket value, address data and duration of residence, previous payment problems, public negative attributes such as non-issuing of information on assets, creditor satisfaction ruled out, creditor satisfaction not demonstrated, debt collection proceedings and debt collection monitoring procedures.

The probability if a person will repay a mortgage loan does not need necessarily to correspond with the probability if they will pay an invoice for a mail order purchase on time. For this reason, CRIF Bürgel GmbH offers its business partners a variety of industry-specific score models: so-called CRIF Bürgel Industry Scores. For specific industries, the period may differ in order to better address the peculiarities of the business models customary in the sector (e.g. telecommunications, mortgage lending). Scores are constantly changing given that the information stored about a person by CRIF Bürgel GmbH is subject to change as well. For example, new information is added whereas other information is deleted in line with applicable retention periods. In addition, information itself changes over time (e.g. the duration of a business relationship), so that changes may occur even without considering new information.

Please note: CRIF Bürgel GmbH itself does not make any decisions; it only supports its affiliated business partners by providing information for their respective decision-making process. The specific business partner is solely responsible for risk assessment and evaluating credit-worthiness due to the circumstance that only they have access to a wide variety of additional information, e.g. information contained in the credit application. This applies even if they rely solely on the information and score values supplied by CRIF Bürgel GmbH.

You can also visit our website www.crifbuergel.de/-datenschutz to read the latest status of our information sheet according to Art. 14 GDPR.