

SCHUFA information

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

SCHUFA Holding AG, Kormoranweg 5, 65201 Wiesbaden, Tel.: +49 (0) 6 11-92 78 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. For this purpose, score values are also calculated and transmitted. It only provides the information if 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 creditworthiness 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, creditworthiness checks, money laundering prevention, identity and age checks, address determination, 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) DS-GVO.

2.2 Legal basis for data processing

SCHUFA processes personal data on the basis of the provisions of the General Data Protection Regulation. The processing is carried out on the basis of consents as well as on the basis of Art. 6 (1) (f) DS-GVO, 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 may be revoked at any time vis-à-vis the contractual partner concerned. 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 located in the European Economic Area and in Switzerland as well as, if applicable, in other third countries (provided that 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 stated 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 behaviour and contract compliance)

- Personal data, e.g. surname (if applicable, also previous names which are provided on separate application), 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, instalment loans, credit cards, garnishment protection accounts, basic accounts)
- Information on undisputed, due and repeatedly 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 contracting parties domiciled 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 DS-GVO 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. SCHUFA has set standard periods for checking the necessity of further storage or 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 that 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. garnishment protection accounts, basic accounts), as well as guarantees and trading accounts that are kept on the credit side, immediately after notification of termination.
- Data from the debtor lists of the central enforcement courts after three years to the day, but earlier if the SCHUFA is provided with evidence 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 for lack of assets, the revocation of protective measures or on the denial of residual debt discharge after three years to the day

Personal pre-addresses remain stored for a period of three years, after which the need for continued storage is reviewed for a further three years. After that, 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 SCHUFA pursuant to Article 15 of the Data Protection Regulation, the right to rectification pursuant to Article 16 of the Data Protection Regulation, the right to deletion pursuant to Article 17 of the Data Protection Regulation and the right to restriction of processing pursuant to Article 18 of the Data Protection Regulation. SCHUFA has set up a Private Client ServiceCenter for concerns of data subjects, which can be contacted in writing at SCHUFA Holding AG, Private Client ServiceCenter, P.O. Box 10 34 41, 50474 Cologne, by telephone at +49 (0) 6 11-92 78 0 and via an Internet form at www.schufa.de. 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 vis-à-vis the contractual partner concerned.

**According to Art. 21 (1) DS-GVO, data processing may be refused for reasons,
The data subject may object to the processing of personal data resulting from the specific situation of the data
subject.
The objection can be made without formalities and is to be addressed to
SCHUFA Holding AG, Private Clients 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 Section 31 BDSG when scoring. Based on the entries stored for a person, an allocation 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 to calculate the score, although not every type of data is 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 according to Art. 9 DS-GVO. The assertion of rights according to the DS-GVO, e.g. the inspection of the information stored at SCHUFA according to Art. 15 DS-GVO, also has no influence on the score calculation.

The score values transmitted support the contractual partners in decision-making and are incorporated into risk management there. The risk assessment and evaluation of creditworthiness is carried out solely by the direct business partner, since only the latter has a great deal of additional information - for example from a credit application. This is true even if he relies solely on the information and score values provided by SCHUFA. In any case, a SCHUFA score alone is not a sufficient reason to refuse to conclude a contract.

Further information on credit scoring or the detection of conspicuous circumstances is available at www.scoring-wissen.de.