SCHUFA Notification according to Art. 14 GDPR

1 Name and contact details for the controller and the company data protection officer

SCHUFA Holding AG ('SCHUFA'), Kormoranweg 5, 65201 Wiesbaden, Tel.: +49 (0)611-92 78 0. The company data protection officer can be reached at the above address, with the addition 'zu Hd. Abteilung Datenschutz' [FAO 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

2.1.1 Assessment of creditworthiness, fraud prevention, legitimacy checks, money laundering prevention, identity and age checks, address identification, customer support or risk management, and setting rates or conditions

SCHUFA processes personal data in its production database in order to provide authorised recipients with information for assessing the creditworthiness of natural and legal persons. SCHUFA also determines and communicates scores for this purpose. It only makes information available if a legitimate interest in this has been credibly presented in a specific case and processing is lawful based on a weighing of interests. A legitimate interest exists, in particular, before entering into transactions that carry a financial default risk. The credit check serves to protect the recipients' own legitimate interests, but also the legitimate interests of their contractual partners and the general public. In particular, it serves to protect borrowers from excessive indebtedness, to protect recipients from losses in credit-relevant transactions, and to support a functioning credit economy. The data is also processed for fraud prevention, legitimacy checks, money laundering prevention, identity and age checks, address identification, customer support or risk management, and for setting rates or conditions.

2.1.2 Processing for other purposes

In addition to the purpose of safeguarding the interests referred to above, SCHUFA also processes personal data in pursuit of other interests (e.g., data protection monitoring, the assertion of legal claims and defence in legal disputes, research and development, the conduct of internal and external research projects (e.g., SCHUFA Credit Compass), participation in national and international external research projects related to the processing purposes referred to above, safeguarding IT security and operations, and the continued development of products and services, in particular to comply with regulatory requirements. The continued development of products and services also includes the development of score models and their testing by contractual partners before the contractual partners use a score model in their active processes). Legitimate interests in the processing exist for SCHUFA, its contractual partners and the general public. In other respects, the legitimate interest is of an economic nature (quotations, provision and continued development of SCHUFA's products and services, efficient task fulfilment, avoidance of legal risks). In addition to personal data, anonymised data may also be processed. SCHUFA will inform you of any changes to the purposes for which data is processed in accordance with Art. 14(4) GDPR.

2.2. Legal bases for data processing

SCHUFA processes personal data on the basis of the provisions of the General Data Protection Regulation and the German Federal Data Protection Act. Processing takes place on the basis of consent (Art. 6(1)(a) GDPR) and on the basis of Art. 6(1)(f) GDPR, insofar as processing is necessary in pursuit of the legitimate interests of the data controller, or of a third party, and does not outweigh the interests or fundamental rights and freedoms of the data subject that require the protection of their personal data. Consent can be withdrawn at any time vis-à-vis the respective contractual partner. The withdrawal of consent does not affect the lawfulness of any processing of personal data that took place before the consent was withdrawn. Any processing that SCHUFA undertakes in order to comply with a statutory obligation is based on Art. 6(1)(c) GDPR.

2.3 Origin of the data

2.3.1 SCHUFA's contractual partners

SCHUFA receives some of its data from its contractual partners. These comprise 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) and are domiciled in the European Economic Area, in Switzerland and, if applicable, in other third countries (provided that the European Commission has issued a corresponding adequacy decision or standard contractual clauses have been agreed, which can be read at www.schufa.de), as well as other contractual partners who use SCHUFA products for the purposes specified under Section 2.1, in particular from the (mail order) trade, e-commerce, service, rental, energy supply, telecommunications, insurance or debt collection sectors.

2.3.2 Data from generally accessible sources

In addition, SCHUFA processes information from generally accessible sources such as public directories and official announcements (e.g., debtor directories, insolvency announcements) or from compliance lists (e.g., lists of politically exposed persons and sanctions lists), as well as from data suppliers.

2.3.3 Entries by data subjects

SCHUFA may also store personal data provided directly by data subjects after appropriate notification and verification.

2.4 Categories of personal data subject to processing

Personal data, e.g., surname (if applicable, also previous surnames, which are provided upon a separate request), first name, date of birth, place of birth I Address information, e.g., current and previous addresses, as well as other addresses used in the course

of business I Information on the initiation and execution of a transaction in accordance with the contract (e.g., current accounts, instalment loans, credit cards, accounts exempt from garnishment, basic accounts, purchases on account) I Information on unfulfilled payment obligations, such as undisputed claims that are due for payment and for which the debtor has been repeatedly dunned, or claims reduced to judgement, and their settlement I Information on improper or other fraudulent conduct such as identity or credit fraud I Information from generally accessible sources (e.g., debtor directories, insolvency announcements) | Data from compliance lists I Information on whether generally accessible sources contain an entry on a public figure with matching personal data, and in what capacity the person is listed there I Scores

2.5. Categories of recipients of personal data
Recipients are contractual partners within the meaning of Section 2.3 who are domiciled in the European Economic Area, in Switzerland and, if applicable, in other third countries (provided that the European Commission has issued a corresponding adequacy decision or standard contractual clauses have been agreed, which can be read at www.schufa.de). Additional recipients may include external contractors of SCHUFA in accordance with Art. 28 GDPR, external lawyers, auditors, and external and internal SCHUFA bodies. SCHUFA is also subject to the statutory intervention powers of state authorities.

2.6 Data retention period
SCHUFA only stores information about persons for a certain period. The decisive criterion for determining the length of this period is the necessity of processing the data for the purposes described above. Specifically, retention periods for production data are specified in a Code of Conduct for the Association of Credit Bureaus 'Die Wirtschaftsauskunfteien e. V.'. After the expiry of the periods specified there, the data covered by this Code of Conduct is no longer available to SCHUFA for active processing in its operations as a credit bureau. For other purposes under Section 2.1. (e.g., for accounting purposes, for data protection monitoring, for data backup purposes, for the purposes of legal defence and the protection of the retention periods laid down by law or in the articles of association, and for analyses, research, development and the continued development of products and services), the data can be retained until the respective purpose of the processing no longer applies. The Code of Conduct of 'Die Wirtschaftsauskunfteien e. V.' and further details on our deletion periods can be viewed at www.schufa.de/loeschfristen. The provisions on address data in Part IV, Section 4 a) and b) of the Code of Conduct apply mutatis mutandis to the contact data specified in Section 2.4.

3 Rights of data subjects

According to Art. 21(1) GDPR, data subjects have the right to object to data processing based on their particular situation.
The right to object also applies to the profiling described below. An objection can be submitted informally and can, for example, be addressed to SCHUFA Holding AG, Privatkunden ServiceCenter, Postfach 10 34 41, 50474 Cologne.

In relation to SCHUFA, every data subject has the right of access 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 a restriction of processing pursuant to Art. 18 GDPR. SCHUFA does not inform a data subject separately in accordance with Art. 14 GDPR when information about improper or fraudulent conduct on the part of this data subject is recorded and stored. This ensures that measures to combat fraud are not compromised by data subjects being informed of them in advance. SCHUFA has set up a Private Customer Service Centre for requests by data subjects. It can be reached in writing at SCHUFA Holding AG, Privatkunden ServiceCenter, Postfach 10 34 41, 50474 Cologne, Germany, by telephone at +49 (0)611-92 78 0 and via an enquiry form at www.schufa.de/rueckfrageformular. You can also contact us using the contact details provided in Section 1 if you wish to assert your rights. It is also possible to contact the supervisory authority responsible for SCHUFA, the Commissioner for Data Protection and Freedom of Information for the State of Hesse. Consent can be withdrawn at any time vis-à-vis the respective contractual partner.

4 Profiling (scoring)

As well as providing information about the production data stored about a person, SCHUFA supports its contractual partners by developing profiles, in particular through 'scores'. The generic term 'profiling' refers to the processing of personal data by analysing certain aspects relating to an individual. Particular importance is attached to 'scoring' in the context of the credit assessment. However, scoring can also fulfil other purposes mentioned in Section 2.1 of this SCHUFA Notification. Scoring is the process of forecasting future events and behaviour on the basis of information currently stored about the person in SCHUFA's production database. On the basis of this production data, data subjects are assigned to statistical groups of persons with similar underlying data. In addition to the logistic regression method that has been used for many years in the area of credit scoring, SCHUFA can also use scoring methods from the categories of complex non-linear methods or expert-based methods. It is always particularly important to SCHUFA that the methods used are mathematically and statistically recognised and scientifically sound. Independent external experts have confirmed the scientific validity of these methods. In addition, the methods used are disclosed to the competent supervisory authority. It is a matter of course for SCHUFA to regularly check the quality and up-to-dateness of the methods used, and to update them as appropriate. Credit scores are determined by SCHUFA on the basis of production data stored by SCHUFA relating to a specific person. This data is identified in the disclosure pursuant to Art. 15 GDPR. A person's age, name, gender and address data, in particular, are not used to determine credit scores. The production data is aggregated into data types, which can be viewed at www.schufa.de/scoring-faq, to determine credit scores. Additional data (types) may be included when determining scores for other purposes. Information about minors or particularly sensitive data in accordance with Art. 9 GDPR (e.g., ethnic origin or information about political or religious views) is not stored by SCHUFA and is therefore not available for profiling. The assertion of the rights of data subjects based on the GDPR, such as access to data stored by SCHUFA concerning the data subject themselves in accordance

with Art. 15 GDPR, also has no influence on profiling. In order to take the individual characteristics of specific sectors or individual contractual partners into account, SCHUFA offers different sectors-specific, or even customer-specific, score models. The new SCHUFA score is gradually replacing the six sector scores for banks, savings banks, cooperative banks, telecommunications, trade, and the mail order trade/e-commerce. It was developed with the goal of making the criteria used for the scoring and their influence on the score completely transparent and easy to understand. It is based on a limited number of specified criteria, which are explained transparently. Scores change constantly because the data stored by SCHUFA in its production database is constantly changing. Thus, new data is added while other data is deleted based on retention periods. In addition, the data itself also changes over time (e.g., the duration of a business relationship). This means that changes can occur even without new data. Please note: in principle, SCHUFA does not make any decisions itself. It merely helps affiliated contractual partners with their risk management by providing information and creating profiles. The decision for or against a transaction, however, is made solely by the contractual partner.
If a contractual partner relies significantly on SCHUFA scoring when making a decision regarding the establishment, execution or termination of a contractual relationship, the provisions of Section 37a BDSG and Art. 22 GDPR also apply. In these cases, SCHUFA scoring can, for example, help the contractual partners to quickly process everyday credit transactions. However, it can also lead to a contractual partner making a negative, potentially adverse decision regarding 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 methods currently in use) can be found at www.schufa.de/scoring-faq.

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