

Information pursuant to Articles 13 and 14 of the General Data Protection Regulation (GDPR)

regarding data processing in connection with the provision of debt collection services

Identity of the controller:

UAI SOLUTIONS GmbH, Schellenbruckplatz 49, D-84307 Eggenfelden, Tel.: +49 8721 506970, Email: dataprivacy@uai.group

Data Protection Officer:

You can contact the Data Protection Officer of UAI SOLUTIONS GmbH at: UAI SOLUTIONS GmbH, Data Protection Officer, Schellenbruckplatz 49, D-84307 Eggenfelden, Email: dataprivacy@uai.group.

Categories of personal data processed:

- **Contact and address data**, such as first and last name, street, house number, ZIP code, city
- **Communication data**, such as phone number, cell phone number, email address
- **Personal master data**, such as place of birth, date of birth, birthday, month of birth, gender
- **Creditworthiness information** such as income, type of income, earnings, rent, maintenance obligations or amounts, etc.
- **Relationship information**, such as employer, landlord, vehicle owner, attorney, insolvency administrator, guardian
- **Identifiers**, such as license plate numbers, country codes, vehicle category, vehicle images, file numbers, previous file numbers
- **Payment, billing, and accounting information**, such as IBAN, BIC, bank details, reason for or status of the claim
- **Commercial and business letters**

Processing purposes:

- Debt management
- Processing of payment transactions
- Credit assessment and verification, including the determination of the residence, income, and assets of debtors or affected third parties
- Identity verification
- Debt collection and processing in connection with individual and collective enforcement proceedings, in particular the enforcement of our own and/or third-party claims for contractual performance and damages
- Compliance with statutory obligations regarding information, notification, disclosure, and record retention
- Compliance with statutory obligations to mitigate damages (Section 254(2) BGB, Section 4(5) RDGEG)
- Handling of objections and defenses
- Conclusion and settlement of settlement agreements with debtors or third parties
- Enforcement of claims through judicial dunning or judgment proceedings
- Registration of claims with credit bureaus and business information systems
- Claims processing in connection with individual and collective enforcement
- Defense against claims of avoidance, unjust enrichment, or other counterclaims
- Reminders and payment demands
- Financial and general ledger accounting; preparation of tax returns, annual financial statements, profit and loss statements, balance sheets, business performance reports, and other tax- and legally relevant documents and/or information
- Debt valuation
- Conflict of interest review
- Transfer to other collection agencies, attorneys, and other legal and/or financial service providers for the purpose of debt collection and/or debt processing in connection with individual and general enforcement proceedings
- Obtaining enforcement orders against debtors or conducting judicial dunning or judgment proceedings
- Administration of existing contracts (contract management)
- Determination of vehicle owner data in connection with usage fees charged by private infrastructure operators (no claims under public law)

Information on the origin of data:

Personal data about the data subject is collected

from the data subject, from the data subject's creditors, from creditors via EUCARIS, from third parties (in particular vehicle owners), from credit bureaus, from third-party debtors, from courts, authorities, and parties in their official capacity, from accessible registers, and/or from public media such as the internet, newspapers, public notices, and bulletin boards

Legal basis for processing:

The following legal bases for processing may apply:

- The existence of consent pursuant to **Art. 6(1)(a) GDPR**

If such consent has been given, the data subject has the right to withdraw it at any time without affecting the lawfulness of the processing carried out on the basis of the consent prior to its withdrawal.

- **Art. 6(1)(b) GDPR** and/or **Art. 6(1)(c) GDPR**

- **Article 6(1)(f) of the GDPR**, insofar as it concerns the pursuit of the purposes of processing payment transactions, creditworthiness assessment and verification—including the determination of the residence, income, and assets of debtors or affected third parties—identity verification, the enforcement of our own and/or third-party claims for contractual performance

and damages, the creation of enforcement titles against debtors or judicial dunning or judgment proceedings, the determination of owner data in connection with usage fees of private infrastructure operators (excluding those under public law), and/or the assessment of claims.

- **Art. 9(2)(a) GDPR**, insofar as special categories of personal data are processed in the debtor's interest (for example, in the context of the temporary suspension of debt collection due to the debtor's illness).

Criteria for the retention period:

Personal data is processed until the purpose of collection—or, in the case of further processing, the purpose of such further processing—has been fully achieved. Once the purpose has been fully achieved, the data is deleted. The company also has a review and deletion policy in place that ensures regular monitoring of its obligations to delete data. The processing of personal data for the purpose of debt collection generally takes place only until the creditor's claim has been paid in full (plus 6 months to account for any subsequent objections or defenses, e.g., due to the debtor's contestation and/or insolvency) or until the debt collection is otherwise discontinued (e.g., settlement, termination of the collection mandate, waiver of the claim by the creditor); from this point on, personal data is processed only to a limited extent, primarily to fulfill legal obligations regarding information, notification, disclosure, and retention, as well as for financial and bookkeeping purposes, the preparation of tax returns, annual financial statements, profit and loss statements, and balance sheets. business analysis reports and other tax- or legally relevant documents and/or information and/or the defense against claims of avoidance, unjust enrichment, or other counterclaims in the context of legal defense, and are completely deleted upon expiration of the statutory retention obligations.

Recipients of personal data:

- Courts, authorities, and/or enforcement agencies,
- third-party debtors,
- security providers and recipients
- clients of the controller (creditors of the data subject)
- Credit bureaus
- Members of the corporate group
- Representatives of legal and business advisory professions
- Postal service providers
- Processors of the controller

Your rights as a data subject:

You have the following **rights vis-à-vis our company** pursuant to Articles 15 through 22 of the GDPR:

- Right to access, rectification, erasure, restriction of processing, and data portability.
- Right to object to processing based on the legitimate interests of the controller or a third party (Article 6(1)(f) of the GDPR).

Right to lodge a complaint with the supervisory authority

- Pursuant to Article 77 of the GDPR, you have the right to lodge a complaint with the supervisory authority if you believe that the processing of your personal data is not lawful. The address of the supervisory authority responsible for our company is:

Bavarian State Office for Data Protection Supervision
Promenade 18, 91522 Ansbach
Phone: +49 (0) 981 180093-0; Email: poststelle@lda.bayern.de

Automated decisions in individual cases:

Automated decisions in individual cases within the meaning of Article 22 of the GDPR are not carried out.

Information regarding your obligation to provide data as a data subject:

Our company's mission is to provide legal services. In the course of providing these services, you may be legally obligated to provide information to our company. This may be the case, for example, if we enforce enforceable claims for information against you on behalf of and under the authority of the creditors we represent; likewise, you may be obligated under contractual provisions to provide information to creditors represented by us. Furthermore, in the event that we assert a claim against you based on third-party legal positions and, in this context, contractual agreements are concluded between you as the debtor and the creditors we represent regarding debt collection in the form of settlements (e.g., installment payment agreements), we may make the conclusion of a settlement contingent upon your provision of specific information (e.g., credit and financial information, data on existing employment relationships, bank details). Failure to provide this information, which you are **not obligated to** do, may in this respect result in the non-conclusion of such agreements with the creditors we represent. In the interest of maximum transparency under data protection law, we will separately notify you of any obligations to provide information in each individual case prior to the actual data collection.