

PRIVACY POLICY

Coface Finanz GmbH ("**Coface**" or "**we**") is a global provider of factoring solutions and services in the B2B business. Coface is a subsidiary of Compagnie française d'assurance pour le commerce extérieur¹ (Bois-Colombes, France) and thus part of the Coface Group, which offers credit insurance, guarantees, business information and debt collection services worldwide through its branches and other companies.

You will find the contact details of our data protection officer at the end of this document.

Coface acts as a controller in the provision of products and services. This means that Coface is the legal entity that exercises control over the personal data collected. Accordingly, Coface is legally obliged to ensure that internal procedures and processes are in place to protect the data collected and to safeguard the rights of data subjects.

Within our area of activity, we mainly process information about companies and organisations that are either our customers and have assigned receivables to us. Or they are the debtors of the receivables assigned to us. Nevertheless, we may also process data that is categorised as "personal data" in accordance with the European General Data Protection Regulation ("GDPR"), in particular if this data is used to specify or verify claims assigned to us. This is the case, for example, if the information relates to a natural person (e.g. a managing director, sole trader, beneficial owner or other contact person) and it is not possible to distinguish between a private individual and, for example, a sole trader.

In any case, we process personal data in accordance with European Union law and other data protection laws outside the EU. In particular, the European General Data Protection Regulation and the German Federal Data Protection Act apply to data processing.

As an information processing company, data and information are among our most important assets. We have made it our mission to handle your personal data securely, carefully and in a fair and transparent manner. Strict internal guidelines, controls and compliance supervision ensure that data is used appropriately. Your trust in our secure and professional handling of data is important to us.

This privacy policy explains the purpose and background to the processing of personal data, the categories of sources and recipients of personal data, data storage and your rights as a "**data subject**" depending on your particular situation.

- Visitors to our website - Chapter I
- Potential customer or recipient of commercial offers or information - Chapter II
- Customer, broker, guarantor, business partner or supplier - Chapter III
- Debtor or buyer in a potential contractual relationship with one of our customers - Chapter IV
- Are you the debtor of a claim purchased by Coface? - Chapter V

In addition, we inform you as a data subject about other important information and rights:

¹ Compagnie française d'assurance pour le commerce extérieur (Coface), a public limited company under French law with registered capital of €137,052,417.05 and head office at 1, place Costes et Bellonte - 92270 Bois-Colombes, France, and registered with the Nanterre Trade and Companies Register under number B 552 069 791, together with its subsidiaries and branches.

- Do we transfer personal data to regions outside the European Economic Area ("**EEA**")? - Chapter VI
- How do we protect your personal data? - Chapter VII
- What are your data protection rights and how can you contact us? - Chapter VIII

We are constantly improving our services and processes in order to protect your personal data. Accordingly, this privacy policy is also subject to change. You can find the current version of our privacy policy on our website.

Chapter 1: You are a visitor to our website

Type of data collection

We collect personal data that you provide to us, e.g. when using services on our website, entering data in an online contact form and/or activating a newsletter opt-in box.

We confirm that the entry of this data in this context is voluntary and is not subject to a legal or contractual obligation or a requirement necessary for the conclusion of the contract.

Data categories

We process various types of personal data that you provide to us, such as first and last name, business address, business telephone number, business or personal e-mail address or other information provided when registering for one of our services or products.

Purposes and legal basis

We collect and process your personal data, based on your consent, for the purpose of

- Provision of products and services
- Optimisation of our business offers for you
- Maintaining contact with you
- Processing of enquiries or complaints.

The data entered in the contact form is processed on the basis of a legitimate interest (Art. 6 para. 1 lit. f GDPR). By providing the contact form, we would like to make it easy for you to contact us. The information you provide will be stored for the purpose of processing your enquiry and for possible follow-up questions. If you contact us to request a quote, the data entered in the contact form will be processed to carry out pre-contractual measures (Art. 6 para. 1 lit. b GDPR).

Right of cancellation

You have the right to withdraw your consent at any time by contacting us at the same address from which we contacted you.

Recipients of the collected data

In order to fulfil the purposes described above, your personal data may be transmitted to all companies of the Coface Group, our business partners and service providers.

Period for which the personal data is stored

- Newsletter contact data (e-mail): We store your data as long as you have not revoked your consent or objected to data storage.
- Data that you have entered in the contact form: We will delete your data immediately upon receipt of a cancellation or objection or in the event of 2 years of inactivity (if you have not responded or sent a new request). If the information is to be categorised as a commercial letter, it will be retained for a period of six years from the end of the calendar year in which we received the commercial letter.

Cookies, statistical data & connection data

If you are a visitor to our websites, our aim is to inform you clearly and openly about the data we collect and use in relation to you.

In most cases, and also depending on the personal settings and the consent given, Coface websites use persistent cookies, session cookies. Sometimes pixel technologies, local storage technologies or other similar technologies such as advertising IDs and tags are also used.

On our website you will find a complete and detailed list and description of the settings and activities as well as a permanent link via which you can set and change your personal settings and consents at any time.

Chapter II: You are a potential customer or recipient of commercial offers or commercial information

Type of data collection

We collect business contact data from various sources such as:

- Referrals from clients, brokers, agents or other partners who refer you to us or to whom you have given your consent to share personal data with us.
- Publicly accessible sources (Internet, commercial register), also using qualified Internet scanning technologies.
- Own customer databases.
- Contact details that we have received directly from you.

Under no circumstances is there an obligation to provide business contact details to Coface for commercial purposes.

Data categories

We process various types of personal data that you provide to us, such as first and last name, business address, business telephone number, business or personal email address or other information, such as industry affiliation, provided by the source from which the personal data was collected.

Purposes and legal bases

We collect and process your data based on your consent or our legitimate interest (Art. 6 para. 1 lit. f GDPR)

- to stay in contact with you, to inform you about our (new) products and services.
- to plan promotional activities and business events.
- to analyse your business requirements and environments and to optimise our products and product offerings accordingly.

Right of cancellation

You have the right to withdraw your consent at any time by contacting us at the same address from which we contacted you.

Recipients of the collected data

In order to fulfil the purposes described above, your personal data may be transferred to all companies in the Group and to our business partners (if the data is publicly available).

Period for which the personal data is stored

We will delete your data:

- after receipt of a cancellation or objection.
- After 2 years of persistent inactivity (if you have not replied or sent a new enquiry).

Chapter III: You are a customer, broker, guarantor, business partner or supplier

Type of data collection

Primarily, we collect your personal data by asking you to fill in forms, complete contractual documents (electronic documents, paper or entering data in Coface platforms) or provide us with data in other ways.

We may also collect your data from the following sources:

- Other Group companies, branches, subsidiaries or business partners.
- Publicly available sources.
- Information/data providers.

Please note that the provision of the data that we request directly from you is an essential and mandatory prerequisite for the conclusion and execution of the contract, the creation of master data in our systems and for compliance with money laundering regulations and risk prevention.

Data categories

We collect and process various types of personal data such as

- Information about your organisation that may be considered personal data insofar as it contains information relating to an individual (e.g. sole trader, manager, beneficial owner, shareholder, beneficiary, personal business contact, etc.)

- Contact details and personal identification data such as name, title, role, business telephone number, business e-mail address, country, city and date of birth, ID, company name (if identical to personal name).
- The following information may also be considered personal if your company is not a legal entity: personal bank account number, sales or tax identification number, accounts receivable history, contract details and other financial information.

Purposes and legal basis

We collect and process your data in the course of

- the preparation and performance of a contract with you (Art. 6 para. 1 lit. b GDPR)
 - to offer, perform and provide our services in relation to our contracts. This may include commercial communications with you, assessing your creditworthiness and that of your debtors, providing customer care services, debt collection and complaints handling; for the establishment, exercise or defence of legal claims.
- our legitimate interests (Art. 6 para. 1 lit. f GDPR)
 - to carry out our own refinancing (e.g. resale of receivables purchased by you to our refinancing partners) or as part of risk-reducing measures.
 - for commercial purposes and to improve our products and services, to carry out statistical analyses and market research
- Compliance with legal obligations (Art. 6 para. 1 lit. c GDPR)
 - to comply with laws, government regulations and directives, or a legal obligation or (also voluntary) compliance with the requirements of a (sector or industry-specific) code or similar guidelines.
 - compliance with (reporting) obligations to supervisory and other authorities.
 - in the implementation of "Know your customer" and "Know your supplier" programmes, to combat fraud, terrorism and money laundering, to carry out sanctions list checks and other compliance checks.

Right of cancellation

You are entitled to withdraw your consent at any time by contacting the same address from which Coface contacted you.

Recipients of the collected data

In order to fulfil the above-mentioned purposes, your personal data may be passed on to other companies of the Coface Group, supervisory authorities and other authorities, companies for fraud or crime prevention and investigation, business partners, reinsurers, banks, refinancing partners, external auditors, lawyers, debt collection companies and service providers (e.g. for IT, customer service or similar).

Period for which the personal data is stored

If we process your personal data in fulfilment of a contract, the duration of storage depends on the duration of the contract and the subsequent (local) statutory retention periods. The same applies if we process your data as part of our refinancing and/or risk minimisation activities. Depending on the type of document, the retention periods can be between six and ten years (Section 147 of the German Fiscal Code and Section 257 of the German Commercial Code).

If we process personal data for the purpose of combating fraud, we will retain the relevant data for a reasonable period of time, as long as the retention of the data can make a significant contribution to combating fraud.

If we process personal data to fulfil legal obligations (e.g. in the context of combating money laundering, combating terrorism, etc.), the retention period is based on the relevant laws.

If we process the data in the context of marketing campaigns, we will delete your data

- upon receipt of a cancellation or objection;
- after 2 years of inactivity (if you have not replied or sent a new enquiry).

Chapter IV: You are acting or are in a (future) business or economic relationship with one of our customers (as debtor or purchaser)

Type of data collection

First and foremost, we receive your personal data from our customers.

In addition, we receive your data from the following sources:

- Credit agencies (credit agencies, address verification companies, financial information companies);
- Publicly accessible sources (e.g. commercial registers);
- By yourself, when you contact us;
- Own research;
- Partner.

Unless you provide us with information directly, we do not receive all data collections directly from you.

Data categories

- Information about your organisation that may be considered personal data insofar as it contains information relating to an individual person (e.g. sole trader, director, beneficial owner, shareholder, beneficiary, professional contact, etc.).
- Contact details and personal identification data, e.g. name, title, function, business telephone number, business e-mail address, country, date and place of birth, ID data, name of the legal entity.
- If your company is not a legal entity, we may also process a personal bank account number, VAT number, claims history, details of the agreement with you and financial information.

Purposes and legal basis

We collect and process your data in the course of

- our legitimate interests (Art. 6 para. 1 lit. f GDPR)
 - for the execution and provision of services in connection with factoring contracts with our customers. This includes assessing your creditworthiness, deciding on the purchase of receivables, determining so-called scores, processing

transactions, carrying out debt collection and processing complaints, processing claims, recovery proceedings, asserting or defending against legal claims. As you are a third party in the economic triangular relationship, the processing of your data is necessary for the fulfilment of legitimate contractual purposes such as credit insurance, debt collection or factoring.

- to carry out our refinancing (e.g. resale of purchased receivables to refinancing partners such as banks, special companies in connection with securitisation programmes).

Compliance with legal obligations (Art. 6 para. 1 lit. c GDPR)

- compliance with (reporting) obligations to supervisory and other authorities.
- in the implementation of "know your customer" and "know your supplier" programmes, to combat fraud, terrorism and money laundering, to carry out sanctions list checks and other compliance checks.
- Your consent
 - When you contact us and voluntarily provide or send us your credit-related information.

Recipients of the collected data

In order to fulfil the above-mentioned purposes, your personal data may be passed on to other companies of the Coface Group, supervisory authorities and other authorities, companies for fraud or crime prevention and investigation, business partners, reinsurers, banks, refinancing partners, external auditors, lawyers, debt collection companies and service providers (e.g. for IT, customer service or similar).

Period for which the personal data is stored

If Coface processes your data in fulfilment of a contract (in which you are a third party in an economic triangular relationship), the duration of storage depends on the duration of the contract and the subsequent (local) statutory retention periods. The same applies if we process your data as part of our refinancing and/or risk minimisation activities.

Depending on the type of document, the retention periods can be between six and ten years (Section 147 of the German Fiscal Code and Section 257 of the German Commercial Code).

If Coface processes data for the purpose of combating fraud, Coface will retain the relevant data for a reasonable period of time as long as the storage of the data can make a significant contribution to combating fraud.

If Coface processes data to fulfil legal obligations (e.g. in the context of combating money laundering, combating terrorism, etc.), the retention period is based on the respective laws.

Chapter V: You are the debtor of a claim purchased by Coface

Type of data collection

If Coface purchases receivables from a customer, transfers them or receives them as security, the details relating to you as a customer are relevant to identify a specific receivable or to collect it (e.g. if Coface has purchased receivables from a recruitment agency for which you have worked, data may be used to identify the receivables).

Receivables purchased by Coface, transferred to us or assigned to us as security are only identified by the name of the debtor, his address, an order number or similar, debtor number, invoice number, date and amount as well as the due date of the receivable (together the "invoice data"), so that Coface does not receive any information about the services invoiced which would make it possible to identify you personally.

The information concretising the claim, which may contain personal data, is encrypted by our customers and transferred in this encrypted form to a data trustee. There are only two scenarios in which Coface receives personal data concerning you:

Either (i) a debtor fails to pay a claim purchased (or pledged or assigned as security) by Coface despite reminders sent by our client (here in its role as our service provider) and Coface must take legal action; or (ii) an insolvency administrator has been appointed over our client's assets and Coface may have an interest in taking over the invoicing, collection and enforcement of the purchased (assigned/pledged) claims. In order to enable Coface to take such action, full records of the receivables may be transferred from the data trustee to Coface.

Data categories

Information received by Coface in any of the above scenarios includes

- Your first name and surname
- Your professional qualification
- Information about the services provided and/or the work you have carried out for our clients' end customers
- Information about when and how long you have worked for our clients' end customers
- Information about your activities and detailed descriptions of your work for our clients' end customers
- The hourly rates charged by our client for your work
- Information about travelling activities on your part in the course of the lines to our customers' end customers, including destination of the trip and travel expenses
- The corresponding invoice data.

Purposes and legal basis

We collect and process your data in the course of

- our legitimate interests (Art. 6 para. 1 lit. f GDPR)
 - to invoice, collect and enforce (assigned/pledged) receivables purchased by us against the respective end customer of our customer. This includes collection activities and judicial enforcement, complaint proceedings and, if necessary, the utilisation of the claim in our refinancing measures.

Recipients of the collected data

In order to fulfil the above-mentioned purposes, your personal data may be passed on to other companies of the Coface Group, supervisory authorities and other authorities, companies for fraud or crime prevention and investigation, business partners, reinsurers, banks, refinancing partners, external auditors, lawyers, debt collection companies and service providers (e.g. for IT, customer service or similar).

Period for which the personal data is stored

As Coface uses your personal data for invoicing, collection and enforcement of the purchased (assigned/pledged) receivables, personal data will be retained until a final court decision and its enforcement or - if a claim is not enforceable - until it is fully written off. Subsequently, the retention of your data may be legally required in order to fulfil certain tax or auditing requirements.

Chapter VI: Does Coface transfer your personal data outside the EEA?

The global economic context and the associated international nature of our services and products mean that data can also be accessed outside the EU via our worldwide group companies and partners if this is necessary and has a legal basis.

We have taken appropriate precautions to transfer your personal data to countries that do not offer an adequate level of protection in accordance with applicable data protection laws. This includes the use of standard contractual clauses approved by the European Commission.

Chapter VII: How does Coface protect your personal data?

We endeavour to ensure the security of your personal data. To prevent unauthorised access or disclosure, we have put in place appropriate physical, technical and organisational measures to safeguard the personal data we collect and process.

Chapter VIII: What are your data protection rights and how can you contact us?

As a data subject, you have the right to information about the personal data stored (Art. 15 GDPR) and - *if and insofar as other relevant legal requirements are met* - to object to the processing (Art. 21 GDPR), to rectification (Art. 16 GDPR), erasure (Art. 17 GDPR), restriction of processing (Art. 18 GDPR) and the right to data portability (Art. 20 GDPR). You also have the right to lodge a complaint with your local supervisory authority to verify the lawfulness of the processing.

Contact address: If you have a direct or indirect business relationship with us (e.g. as a customer, supplier, purchaser), you are welcome to send your request via the relevant key account contact address or portals or other contact channels that you already know and use. Many data protection concerns (changes to master data, updating data, correcting incorrect data, requests for information) can even be fully resolved in this way.

Pursuant to Art. 21 (1) GDPR, you have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on Art. 6 (1) (f) GDPR. You can address your objection to the data protection officer, whose contact details you will find below.

If you wish to object to commercial activities, you can simply submit your request via the same address that Coface used to contact you.

Our data protection contact address, to which you can address your request, is of course available to you at any time: coface_dpo@coface.com, or by post:

Coface Finanz GmbH, Data Protection Officer, Isaac-Fulda-Allee 1, 55124 Mainz.