

# Data Protection Statement

The Coface Group (the "**Group**") is a global provider of credit insurance, factoring, guarantees, credit information and debt collection services.

The Group operates and facilitates solutions in business-to-business trade.

The Group is present either directly or indirectly via partners in 100 countries and serves customers in more than 200 countries.

It conducts its business activities through Compagnie française d'assurance pour le commerce extérieur and its branches<sup>1</sup> and subsidiaries (together "**Coface**").

Within our area of activity, we mainly collect and process information about companies, businesses and (individual) merchants. Nevertheless, we also process data that is categorised as "personal data" in accordance with the European General Data Protection Regulation ("GDPR"). <sup>2</sup>This is the case 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.

Coface acts as a controller in the provision of its 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.

Nevertheless, we also process data that may be categorised as "personal data" under European Union (EU) law and other data protection laws outside the EU, as it is information that relates to an individual (e.g. a company director, sole trader, beneficial owner or other professional contact).

We have made it our mission to protect the personal data we collect and process. 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, which is why we have made it our mission to handle your personal data carefully and in a fair and transparent manner.

This privacy policy explains the purpose and background of 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

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<sup>1</sup> 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.

<sup>2</sup> Form of business with a merchant operating the trade as sole proprietor.

- Debtor, purchaser or beneficiary (in a potential or existing contractual relationship with one of our customers) - Chapter IV

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

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

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 our current version of the privacy policy on our website. Branches or subsidiaries of Coface may have their own additional statements on their local websites.

## 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.

By actively entering data in our contact form, you give your consent to the following data processing, which also serves as the legal basis for further processing.

### Right to withdraw consent

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, 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 after receiving a cancellation or objection or in the event of 2 years of inactivity (if you have not replied or sent a new request).

### 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.

## 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.

### 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 basis

We collect and process your data based on your consent or our legitimate interest

- 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:

- By receiving 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 and/or complete contractual documents (electronic documents, paper or entering data in Coface platforms).

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 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 bases

We collect and process your data in the course of

- the preparation and execution of a contract with you
  - to offer, perform and provide our services in relation to our contracts. This may include business communications with you, processing transactions, assessing (commercial) insurance risks and cover, claims handling, recovery procedures, offering credit and risk management products and services, providing customer care services, debt collection and complaints handling; for the establishment, exercise or defence of legal claims.
- our legitimate interests
  - for commercial purposes and to improve our products and services, to carry out statistical analyses and market research
- compliance with legal obligations
  - 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.

- 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.
- to protect our own interests, to protect ourselves from damage caused by fraudulent activities and to fulfil legal requirements such as anti-money laundering regulations,

This activity is based on the legal ground of "legitimate interest" - to protect our interests in not being harmed by fraudulent activities - and to fulfil legal requirements, such as anti-money laundering legislation, etc.

## 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 all Coface companies and Coface branches, companies for fraud or crime prevention and investigation, business partners, reinsurers, banks, external auditors, lawyers and debt collection agencies.

## 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.

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 in the context of combating money laundering, combating terrorism, etc., the retention period is based on the respective 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 act or are in a (future) business or economic relationship with one of our customers (as debtor, purchaser or "beneficiary")

### 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
  - to perform and provide services in connection with existing contracts with our customers. This includes the processing of transactions, debt collection and the processing of complaints, the assessment of (commercial) insurance risks and cover, the processing of claims, recovery procedures, the assertion of or defence 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
- 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 all Coface companies and Coface branches, companies for fraud or crime prevention and investigation, business partners, reinsurers, banks, external auditors, lawyers and debt collection agencies.

## 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.

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 in the context of combating money laundering, combating terrorism, etc., the retention period is based on the respective laws.

## Chapter V: 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 subsidiaries, branches and partners if this is necessary and has a legal basis.

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



## Chapter VI: 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 VII: 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.

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](mailto:coface_dpo@coface.com), or by post:

Coface, Branch Office in Germany  
Data Protection Officer  
Isaac-Fulda-Allee 1  
55124 Mainz.