PRINCIPLES OF PROCESSING PERSONAL DATA OF AS CREDITINFO EESTI

22.09.2026

1. GENERAL PROVISIONS

1.1. These personal data processing principles (**Principles**) define how AS CREDITINFO EESTI (**Creditinfo**), registry code 10256137, address Tatari 1, 10116 Tallinn, Estonia, processes the personal data of natural persons (**Data Subject**) within the framework of its activities.

1.2. The principles apply to all persons whose data Creditinfo processes when using its services, products or registers, when fulfilling contractual relationships or when fulfilling legal obligations.

1.3. The Principles are an integral part of the General Terms and Conditions of AS CREDITINFO EESTI and are applied together with the General Terms and Conditions, the Terms of Service and other documents established by Creditinfo. In the event of a conflict between the Principles and the General Terms and Conditions, the Estonian text of the General Terms and Conditions shall prevail. Creditinfo may provide additional information on the Processing of Personal Data in the terms applicable to a particular Service, service-specific privacy notices or other documents relating to the Service.

1.4. Creditinfo processes personal data in accordance with the European Union General Data Protection Regulation (GDPR), the Personal Data Protection Act and other applicable legislation. Creditinfo also follows the guidelines and good data protection practices of the Data Protection Inspectorate and the European Data Protection Board.

1.5. Creditinfo acts as either a controller or a processor when processing personal data, depending on the service and data flow, in accordance with the principles and contractual obligations set out in the General Terms and Conditions.

1.6. Creditinfo has appointed a data protection specialist, contact details: e-mail address dataprotection@creditinfo.ee; postal address Tatari 1, 10116 Tallinn; tel. +372 665 9600.

2. DEFINITIONS

2.1. Unless expressly stated otherwise in the Principles, the following terms have the following meanings:

2.1.1. **GDPR** – Regulation (EU) 2016/679 of the European Parliament and of the Council, or the General Data Protection Regulation;

2.1.2. **Data subject** – an identified or identifiable natural person. An identifiable natural person is a person who can be identified, directly or indirectly;

2.1.3. **Data recipient** – any person to whom Creditinfo transmits the Personal Data of the Data Subject, i.e. recipient within the meaning of the GDPR;

2.1.4. **Personal data** – any information about an identified or identifiable natural person (Data Subject);

2.1.5. **Processing** – any automated or non-automated operation or set of operations performed on Personal Data of a Data Subject or on sets thereof, including collection, storage, use, transfer, deletion, etc. of Personal Data.

2.1.6. **Services** – services provided by Creditinfo as defined in the General Terms and Conditions of AS Creditinfo Eesti, including My Creditinfo (Minu Creditinfo portal), e-Krediidiinfo, the Payment Default Register, Credit Assessment, AI services and other Creditinfo services;

2.1.7. **Website** – Creditinfo's official website www.creditinfo.ee;

2.1.8. **Web environment** – Creditinfo e-services environments https://www.e-krediidiinfo.ee, https://target.creditinfo.ee, https://www.minucreditinfo.ee, https://marketreview.creditinfo.ee and the Creditinfo Account Portal.

Other capitalized terms are used in the meaning defined in the General Terms and Conditions of AS CREDITINFO EESTI.

3. GENERAL PRINCIPLES

3.1. **Legality, fairness and transparency.** Creditinfo processes Personal Data lawfully, fairly and transparently, in accordance with applicable legislation and taking into account the rights and interests of data subjects.

3.2. **Purpose limitation and minimization principle.** Personal data are collected for specified, legitimate

purposes and only to the extent necessary to achieve those purposes.

3.3. **Accuracy and timeliness.** Creditinfo pays attention to ensuring that the Personal Data processed is as accurate, complete and up-to-date as possible.

3.4. **Storage limitation.** Personal data will only be stored for as long as it is necessary to fulfill the purpose of the Processing or to comply with a legal obligation.

3.5. **Security and confidentiality.** Creditinfo implements appropriate technical and organizational measures to protect data from unauthorized access and other violations.

3.6. **Responsibility and documentation.** Creditinfo keeps records of its data processing activities and monitors that the Processing complies with applicable data protection requirements.

3.7. **Respect for the rights of data subjects.** Creditinfo values the rights of Data Subjects and enables them to exercise all rights arising from the GDPR, including the right to access their data, request its correction, deletion, restriction of processing, or object to data processing.

3.8. **Cooperation with supervisory authorities.** Creditinfo cooperates with the Data Protection Inspectorate and other competent supervisory authorities and follows their instructions.

3.9. **Legitimate interest and transparency.** When Creditinfo Processes Personal Data on the basis of legitimate interest, it assesses the necessity and proportionality of the Processing and takes into account the rights and freedoms of the Data Subject. Creditinfo has assessed the existence of a legitimate interest and is convinced that the Processing does not outweigh the rights and freedoms of the Data Subject.

3.10. **Cookies.** Creditinfo uses cookies and similar technologies on its Websites and Online Environments to improve user experience, develop Services and ensure security.

The principles of using cookies are described in Creditinfo's Cookie Policy, which is published on the Website**.**

4. SOURCES AND TYPES OF PERSONAL DATA PROCESSED

4.1. Creditinfo collects and Processes Personal Data for specified and legitimate purposes and in a manner consistent with the purpose and legal basis for the Processing described in these Principles.

4.2. The composition of the Personal Data processed depends on the source of the data and the purpose of the Processing. Creditinfo receives data mainly from the following sources:

4.2.1. public registers and information holders (e.g. commercial register, population register, land register, Official Notices, Tax and Customs Board, State Gazette, public e-file, State aid and de minimis aid register, etc.);

4.2.2. contractual customers and partners;

4.2.3. Data subjects themselves when they use Creditinfo Services;

4.2.4. other persons who have the right to disclose data (e.g. courts, authorities).

4.3. If Personal Data is not collected directly from the Data Subject, Creditinfo will fulfil its notification obligations under Article 14 of the GDPR by publishing these Principles and, if necessary, through other appropriate channels.

5. PROCESSING PUBLIC INFORMATION

5.1. Creditinfo processes Personal Data available as public information through information holders and registers.

5.2. Personal Data Processed as Public Information is:

5.2.1. personal identification code, name, whether the Data Subject has Estonian citizenship, residence permit and right: type and expiry date, fact of death, e- residency;

5.2.2. Balance of claims from the Tax and Customs Board: claim type, debt amount, amount in the payment schedule, disputed amount; unfiled returns: return type and submission deadline

5.2.3. current business and enterprise bans: scope of the ban, validity period, start date, end date, type of ban;

5.2.4. relationship with a legal entity or branches of foreign companies in the following roles: person with the right of representation (e.g. member of the management board, chairman of the management board, procurator): role, start date of the relationship, end date of the relationship; owner of a legal entity (e.g. partner, shareholder, general partner): role, country of location, start date of the relationship, end date of the relationship, type of ownership, size of the stake and percentage of participation; member of the supervisory board and chairman of the supervisory board of a legal entity: role, start date of the relationship, end date of the relationship; other relationship with a legal

entity (e.g. founder, auditor): role, country of location, start date of the relationship, end date of the relationship, beneficial owners (start date, end date, country of location, method of exercising control);

5.2.5. Personal Data contained in media coverage published about a legal entity;

5.2.6. Official announcements related to the data subject: type of announcement, content, start date of publication, end date of publication;

5.2.7. number of properties;

5.2.8. public court decisions: case number, case and procedure titles, dates related to the procedure, court, composition of the court, procedure classifications, decision classifications, case classifications, provisions of the law, solution classifications, types of punishment, full text of the decision;

5.2.9. State aid and de minimis aid: aid number, date of decision to grant aid, amount of aid decided, aid provider, form of aid, name of aid, aid measure, type of aid, purpose of aid.

5.3. Personal Data collected as public information is processed by Creditinfo for the purpose of assessing the creditworthiness, solvency (financial reliability) or other reliability (e.g. background checks in an employment or cooperation relationship or when applying the KYC principle) of the Data Subjects and, in certain cases, also of the legal entities related to them. The legal basis for the processing depends on the specific Service, which is specified below.

6. MY CREDITINFO

6.1. My Creditinfo portal Creditinfo processes Personal Data as an independent controller or processor. Creditinfo is the processor if the data is processed based on information obtained from registers managed by third parties and Creditinfo transmits this data to the Data Recipient immediately after the Data Recipient's instructions (e.g. partly data from the Tax and Customs Board's tax debt register).

6.2. Creditinfo Processes the Personal Data of the Data Subject in the My Creditinfo portal either with the Data Subject's consent (Article 6(1)(a) of the GDPR) or on the basis of legitimate interest (Article 6(1)(f) of the GDPR). The Data Subject may withdraw consent at any time by logging into their personal account in the My Creditinfo portal and sending a notification of withdrawal of consent. Withdrawal of consent does not affect the lawfulness of the Processing of Personal Data before the withdrawal of consent. Upon withdrawal of consent, Creditinfo closes the Data Subject's personal account and terminates the Processing of Personal Data related to the said account in the My Creditinfo portal. In addition, Creditinfo retains the logs of account-related operations for a further four years from the date of closure of the account for the purpose of preparing, filing or defending possible legal claims. If the Data Subject later decides to continue using the My Creditinfo portal in the form of a personal account, they will be shown data on their previous orders for a period of up to seven years, as well as logs.

6.3. The purpose of the Processing of Personal Data is to manage the personal account of the Data Subject as a user of the My Creditinfo portal. Personal data is used to fulfil orders placed by the Data Subject on the My Creditinfo portal and to provide Services. In addition, the My Creditinfo portal allows the Data Subject, based on his/her consent, to make inquiries about his/her Personal Data.

6.4. The Data Subjects of Personal Data Processed through the My Creditinfo Portal are:

6.4.1. Users of the My Creditinfo portal (natural persons);

6.4.2. natural persons whose Personal Data Creditinfo receives as public information from information holders;

6.4.3. natural persons whose payment default information is mediated by Creditinfo.

6.5. The following Personal Data is processed on the My Creditinfo portal:

6.5.1. personal identification data: name, personal identification code, authentication method used to log in to the portal;

6.5.2. contact details: email address and/or telephone number;

6.5.3. Personal Data related to Services: e.g. data on purchased products and services, submitted invoices and their content, if they contain Personal Data, requests, inquiries and complaints submitted by the Data Subject, etc;

6.5.4. in clauses 8.4and 8.5

6.5.5. Personal Data Processed as public information described in section 5.2

6.6. In addition to the above, Creditinfo processes the data from the satisfaction surveys of Data Subjects both for the performance of the contract and on the basis of legitimate interest. The purpose of using the satisfaction survey data is to improve the experience of using the My Creditinfo portal and the quality of the products and services offered on the portal, as well as to develop new products and services.

7. E-KREDIIDIINFO INFORMATION

7.1. On the e-Krediidiinfo portal, Creditinfo processes Personal Data as an independent controller or an authorized processor according to the content of the service. Creditinfo is an independent controller if it transmits Personal Data to the Data Recipient from a register managed by it, e.g. payment default information. Creditinfo is an authorized processor (if the data is processed on the basis of information obtained from registers managed by third parties and Creditinfo transmits this data to the Data Recipient immediately after the Data Recipient's instructions (e.g. partly data from the Tax and Customs Board's tax debt register, land register).

7.2. Creditinfo Processes the Personal Data of the Data Subject publicly available on the e-Krediidiinfo portal and other Personal Data on the basis of the legitimate interest of the Data Recipients (Article 6, Section 1, Point f of the GDPR). The purpose of the Processing of Personal Data is to provide the Data Recipients with the opportunity to assess the creditworthiness, solvency (financial reliability) or other reliability of the Data Subjects (e.g. background check in an employment or cooperation relationship or when applying the KYC principle). Creditinfo has the right to manage such Personal Data and transfer them to Data Recipients who have a justified need and a corresponding legitimate interest or other legal basis for fulfilling the purpose of the Processing.

7.3. The Data Subjects of Personal Data Processed through the e-Krediidiinfo Information Portal are:

7.3.1. Users of the e-Krediidiinfo Information portal and representatives of clients who are legal entities (natural persons);

7.3.2. natural persons whose Personal Data Creditinfo receives as public information from information holders (public databases, etc.);

7.3.3. natural persons whose payment default information is mediated by Creditinfo.

7.4. the e -Credit Information Portal:

7.4.1. Personal Data Processed as public information described in clause 5.2

7.4.2. personal identification data: name, personal identification code, authentication method used to log in to the portal;

7.4.3. contact details: email address and/or telephone number;

7.4.4. Personal Data related to services: e.g. data on purchased products and services, submitted invoices and their content, if they contain Personal Data; Applications, inquiries and complaints submitted by the data subject, etc;

7.4.5. Personal Data related to the payment default information specified in clause 8.4

7.5. In addition to the above, Creditinfo processes the data from the satisfaction surveys of Data Subjects both for the performance of the contract and on the basis of legitimate interest. The purpose of using the satisfaction survey data is to improve the use of e-Krediidiinfo and the quality of the products and services offered on these portals, as well as to develop new products and services.

8. TRANSMISSION OF PAYMENT DEFAULT INFORMATION

8.1. When collecting and mediating payment default information, Creditinfo processes Personal Data as an independent controller.

8.2. Creditinfo Processes payment default information based on the legitimate interest of the Data Recipients (Article 6(1)(f) of the Personal Data Protection Act) so that the Data Recipients can assess the creditworthiness, solvency or other reliability of the Data Subject based on payment default information in order to make informed credit and other decisions and to fulfil the statutory obligation to assess consumer creditworthiness and to engage in responsible lending. The purpose of Processing Payment Default Information is to assist creditors in implementing their obligation to assess consumer creditworthiness and engage in responsible lending.

8.3. Payment defaults are reported to Creditinfo by contractual clients. Creditinfo has the right to manage such data in the payment default register and forward it to Data Recipients who have a justified need and a corresponding legal basis to assess the creditworthiness, solvency or other reliability of the Data Subject. The publication of payment default information helps to ensure that data subjects do not take on excessive obligations or encounter payment difficulties, thereby supporting compliance with the principles of responsible lending.

8.4. Payment default information includes the following Personal Data:

8.4.1. the name, personal identification number or date of birth of the Data Subject concerning the payment default;

8.4.2. the date of the debt arising and ending, the amount of the debt, which is the basis for the payment default;

8.4.3. Origin of the payment defaults (the registerer and field of activity).
8.5. The data subject will be shown the person who made the payment default request and the time through the My Creditinfo portal.
8.6. Data subjects have been informed of the circumstances of Article 14(1) and (2) of the GDPR, i.e. the Principles, via the Creditinfo Website and, as usual, also via a payment default notice sent to the Data Subject or the terms and conditions of the contract concluded between the creditor and the Data Subject, or other similar document.
8.7. Payment default information can be transmitted via the data transmission service, the e-Krediidiinfo portal or the Minu Creditinfo portal.
8.8. Creditinfo publishes payment default information no later than 5 years after the end of the breach of obligation.

9. CREDIT ASSESSMENT

9.1. When preparing a credit assessment, Creditinfo processes Personal Data as an independent controller.
9.2. Creditinfo Processes Personal Data when issuing a credit assessment based on the legitimate interest of the Data Recipients (Article 6(1)(f) of the GDPR). The Data Recipients can assess the creditworthiness or solvency (financial reliability) or other reliability of the Data Subject based on the credit assessment, and the credit assessment helps the Data Recipient to make the right credit and other decisions and to fulfil its legal obligations.
9.3. The credit assessment prepared by Creditinfo is of an informative nature and does not constitute an automated decision within the meaning of Article 22 of the GDPR that would have a legal or equivalent significant effect on the Data Subject; the final decision is always made by the Data Recipient.
9.4. of the Processing of Personal Data is to assess the creditworthiness, solvency or other reliability of the Data Subject and/or to assist creditors in assessing the consumer's creditworthiness and in following the principles of responsible lending.
9.5. Creditinfo contractual clients and clients with a corresponding legal basis submit a request to Creditinfo to prepare a credit assessment of the Data Subject, after which Creditinfo Processes the Personal Data by creating a credit assessment for the Data Subject, which it issues to the Data Recipient. Creditinfo does not store the credit assessment of the Data Subject. Creditinfo only maintains a log of which Data Recipient requested a credit assessment for which Data Subject.
9.6. A credit assessment is an algorithm created as a result of statistical analysis, the purpose of which is to provide an estimate of the probability of a payment default related to an individual. The probability of a payment default is modelled using available data for which a statistical relationship with the occurrence of a payment default has been observed.
9.7. When preparing a credit assessment, the following Personal Data is processed:
9.7.1. personal identification number;
9.7.2. Possession of Estonian citizenship;
9.7.3. type and validity of residence permit or right;
9.7.4. sign of death;
9.7.5. e- residency;
9.7.6. Official Notices data;
9.7.7. business and entrepreneurship bans;
9.7.8. payment default information;
9.7.9. Tax and Customs Board requirements;
9.7.10. inquiries about the Data Subject;
9.7.11. related legal entities and the payment behaviour of such legal entities;
9.7.12. number of properties.

10. PROFILING

10.1. Profile analysis is the automated Processing of Personal Data used to assess certain personal characteristics of a Data Subject. Creditinfo profiles Data Subjects to identify beneficial owners and to prepare a credit assessment.
10.2. For profiling, Creditinfo uses the Personal Data specified in clauses 9.7and the Personal Data of the direct and indirect owners of the legal entity specified in clause 5.2.4. Creditinfo processes this Personal Data on the basis of legitimate interest (Article 6(1)(f) of the GDPR) in order to offer customers the most accurate possible opportunity to identify the beneficial owner and prepare a credit assessment.

10.3. The profiling results prepared by Creditinfo are of an informative nature and do not constitute an automated decision within the meaning of Article 22 of the GDPR that would have a legal or equivalent significant effect on the Data Subject; the final decision is always made by the Data Recipient.

11. OTHER SERVICES

11.1. Creditinfo also Processes Personal Data within the framework of other services (e.g. Target, KYC Utility) by transmitting Personal Data to Data Recipients. Such Processing is carried out on the basis of the legitimate interest of the Data Recipients (Article 6(1)(f) of the GDPR). Data Recipients can assess the creditworthiness or solvency (financial reliability) or other reliability (e.g. when applying the KYC principle) of the Data Subject or a company related to them on the basis of Personal Data. When transmitting data, the following Personal Data is Processed:

11.1.1. name, personal identification number or date of birth;

11.1.2. relationship with a legal entity or branches of foreign companies in the following roles: person with the right of representation (e.g. member of the management board, chairman of the management board, procurator): role, start date of the relationship, end date of the relationship; owner of a legal entity (e.g. partner, shareholder, general partner): role, country of location, start date of the relationship, end date of the relationship, type of ownership, size of the stake and percentage of the stake; member of the supervisory board and chairman of the supervisory board of a legal entity: role, start date of the relationship, end date of the relationship; other relationship with a legal entity (e.g. founder, auditor): role, country of location, start date of the relationship, end date of the relationship, beneficial owners (start date, end date, country of location, method of exercising control).

11.2. When providing the data transfer service, Creditinfo Processes Personal Data as an independent controller (Creditinfo transfers Personal Data from the register managed by it to the Data Recipient) or as an authorized processor (requests from registers managed by third parties, where Personal Data is transferred to Creditinfo immediately after the Data Recipient's instructions and Creditinfo transfers them directly to the Data Recipient, for example, the population register, the pension register, and partly the tax debt register of the Tax and Customs Board).

12. ACCOUNT PORTAL AND AI SERVICES

12.1. When using the Account Portal and AI services, Creditinfo Processes, depending on the Service, package and access rights used, among other things, the user's identification, authentication and contact details, data concerning the user's relationship with and role in a company when using a company account, account, access right, service package and usage limit data, data concerning acceptance of the terms applicable to the Service, and Service usage and audit log data. Usage and audit logs may contain the MCP tool used, input data required to execute the tool request, the time of the request and technical information relating to the execution of the request.

12.2. The categories of Personal Data Processed in a response to a request made through the MCP service depend on the Service used. Through the MCP service, Personal Data described in these Principles in relation to the relevant Service or Processing may be made available to the user to the extent that such use falls within the user's access rights and the permitted purpose of the relevant Service.

12.3. The MCP service may, among other things, involve the Processing of Personal Data relating to sole proprietors and natural persons associated with legal entities. In the case of a sole proprietor, the response may also include a credit or risk assessment prepared by Creditinfo. In the case of natural persons associated with a legal entity, the Personal Data Processed may include, among other things, information concerning the person's role, right of representation, ownership, participation or beneficial ownership status.

12.4. Creditinfo Processes the Personal Data referred to in clause 12.1 for the purposes of providing the Account Portal and AI services, authenticating the user, verifying access rights and the relationship between the user and a company, managing the service package and usage limits, fulfilling requests, ensuring the security of the Service, preventing misuse and auditing the use of the Service. Creditinfo may also Process the user's contact details and data relating to the use of the Service in order to support completion of a Service activation or connection process initiated but not completed by the user, including sending reminders relating to such process.

12.5. Depending on the specific Processing, the Processing of the Personal Data referred to in clause 12.1 is based on the performance of a contract or taking steps prior to entering into a contract (Article 6(1)(b) of the GDPR), the legitimate interests of Creditinfo or a third party (Article 6(1)(f) of the GDPR), or

compliance with a legal obligation to which Creditinfo is subject (Article 6(1)(c) of the GDPR). The purpose and legal basis for the Processing of Personal Data of other Data Subjects included in a response provided through the MCP service are those described in these Principles in relation to the relevant Service or Processing.

12.6. When using the MCP service, the data necessary to fulfil a request initiated by the user is transferred to an MCP-compatible external application selected by the user and supported by Creditinfo. The provider of the external application may Process the data received in accordance with the legal relationship between the user and the relevant service provider and the terms applicable to that service provider.

12.7. The MCP service does not transmit to Creditinfo the original question or instruction submitted by the user to the external application, the conversation history between the user and the external application, or the final response generated by the external application for the user. Creditinfo receives from the external application a specific tool request and the input data required to execute that request.

12.8. Creditinfo retains usage and audit logs relating to the Account Portal and AI services for the purposes of ensuring the security of the Service, maintaining auditability of Service use, detecting misuse and security incidents, and resolving potential claims. Technical logs of the MCP service are generally retained for up to 30 days. Creditinfo may retain audit logs relating to the use of the Service in its own systems for a longer period in accordance with the retention periods established by Creditinfo. Logs relating to a specific security incident, dispute or legal claim may be retained for as long as necessary to resolve the relevant matter.

13. OTHER CASES OF PROCESSING PERSONAL DATA

13.1. Creditinfo also processes Personal Data for the performance of a contract or for the purpose of concluding a contract (Article 6(1)(b) of the Data Protection Act), if the Data Subject is a party to the contract or a person related to the performance of the contract.

13.2. To perform or conclude a contract, Creditinfo processes the following Personal Data:

13.2.1. personal identification code, name, country, connection with a legal entity or branches of foreign companies in the following roles: person with the right of representation (e.g. member of the management board, chairman of the management board, procurator, authorized person), start of the role;

13.2.2. other Personal data arising from the content of a contract to be concluded or concluded.

13.3. Creditinfo also Processes Personal Data for pre-contractual negotiations with job applicants, for concluding an employment contract or preparing it, in order to verify the suitability of the job applicant's education, work experience, skills and personal characteristics (Article 6(1)(b) of the Employment Act). In the recruitment process, Creditinfo Processes Personal Data as an independent controller. In the recruitment process, Creditinfo Processes the following Personal Data:

13.3.1. name, country;

13.3.2. Personal identification number (when making a job offer);

13.3.3. contact details: email address and/or telephone number;

13.3.4. CV (work experience and education) and documents proving education;

13.3.5. names and contact details of recommenders;

13.3.6. criminal record extract with history as part of a background check (when making a job offer);

13.3.7. personality tests;

13.3.8. other Personal data arising from the position or the identity of the job applicant.

13.4. Creditinfo also processes Personal Data to fulfil its legal obligations (Article 6(1)© of the Personal Data Protection Act), including to respond to supervisory authorities and resolve legal claims. In fulfilling its legal obligations, Creditinfo processes the following Personal Data:

13.4.1. name, personal identification number or date of birth;

13.4.2. contact details of the person: e-mail address and/or telephone number;

13.4.3. data on contracts between the person and Creditinfo (concluded and terminated contracts, breaches of contract) and data on services used;

13.4.4. other Personal data due to the content of a legal obligation;

13.4.5. to the provider of an MCP-compatible external application selected by the user, to the extent that the transfer of Personal Data is necessary to fulfil an MCP request initiated by the user and is consistent with the user's access rights and the permitted purpose of the relevant Service.

13.5. In addition to the above purposes, Creditinfo also processes Personal Data for the protection of

Creditinfo's violated or contested rights, for the exercise of Creditinfo's rights in connection with legal claims, their verification and defence in court or out of court. The processing is carried out either on the basis of Creditinfo's legitimate interest or for the performance of a contract concluded with the Data Subject.

13.6. marketing offers and notifications, including newsletters and portal notifications, Creditinfo uses the contact details of Data Subjects and digital environments managed by Creditinfo (including Minu Creditinfo and e-Krediidiinfo), if the Data Subject has given consent in accordance with the conditions set out in legislation on the basis of Article 6(1)(a) of the Personal Data Protection Act. The Data Subject has the right to withdraw consent at any time. Upon withdrawal of consent, Creditinfo will cease using the Data Subject's Personal Data for marketing purposes. Withdrawal of consent does not affect the lawfulness of the Processing of Personal Data that took place on the basis of consent before its withdrawal.

14. TRANSFER OF PERSONAL DATA AND COOPERATION PARTNERS

14.1. Creditinfo transfers Personal Data only to the extent necessary to provide the Services described in these Principles, to protect the legitimate interests of Data Subjects or Data Recipients, to fulfill obligations arising from law, or with the consent of the Data Subject.

14.2. The exact purpose, legal basis and composition of the transmitted personal data depend on the specific Service or data transmission method and are described in the relevant chapters of these Principles (including Minu Creditinfo, e-Krediidiinfo, mediation of payment default information, credit assessment and other services).

14.3. Creditinfo transmits Personal Data:

14.3.1. in response to inquiries and as part of reports to its clients in accordance with the content of the Service and the legitimate interest of the Data Recipient or other legal basis;

14.3.2. to authorities and persons (e.g. law enforcement agencies, courts, supervisory authorities) if the transfer results from legislation or a legitimate request from a competent authority;

14.3.3. in the event of assignment of the right of claim to a new creditor;

14.3.4. Creditinfo for authorized processors.

14.4. Creditinfo may involve authorized processors in the processing of personal data who provide services to Creditinfo (e.g. IT, accounting, archiving or legal services). Creditinfo carefully selects its partners and all processors are contractually obligated to ensure data protection in accordance with Article 28 of the GDPR and Creditinfo's guidelines. Further information regarding specific authorised processors is available upon request by contacting Creditinfo via the provided contact details.

14.5. Where Personal Data is transferred outside the European Economic Area in connection with the provision of a Service, such transfer shall take place only in accordance with the requirements of Chapter V of the GDPR and subject to the application of the required safeguards.

15. PERSONAL DATA RETENTION

15.1. Creditinfo Processes Personal Data for as long as it is necessary to achieve the purposes of the Processing or to comply with an obligation arising from legislation. Creditinfo retains data obtained from public registers for as long as this data is available from the public register.

15.2. If the data is no longer actively used, Creditinfo will retain it for 3+1 years, unless a longer period is required by law, based on Creditinfo's legitimate interest, based on the usual three-year limitation period for claims, and an additional one year to ensure the availability of the data for resolving potential legal claims.

15.3. The data subject can obtain additional information about retention periods by writing to andmekaitse@creditinfo.ee.

16. RIGHTS OF THE DATA SUBJECT IN RELATION TO THE PROCESSING OF HIS PERSONAL DATA

16.1. The data subject has the right to:

16.1.1. obtain information about whether and how Creditinfo processes his/her Personal Data and access this data;

16.1.2. request correction of your Personal Data if it is insufficient, incomplete or incorrect;

16.1.3. request the deletion of your Personal Data in the cases and to the extent provided for in legislation and the Principles, for example, if Creditinfo does not have a legal basis for Processing such Personal

Data or the Personal Data is Processed with the consent of the Data Subject and the Data Subject has withdrawn his/her consent. Such right does not apply if the Personal Data that is requested to be deleted is also Processed on other legal grounds, e.g. for the performance of a contract. In the event that the Processing is based on a legitimate interest, the Data Subject has the right to object and then Creditinfo will assess whether there is a legitimate reason for the Processing or whether such Personal Data should be deleted;

16.1.4. to restrict the Processing of your Personal Data in accordance with the procedure and to the extent provided for by law, for example, during the time when Creditinfo assesses whether the Data Subject has the right to have their Personal Data deleted;

16.1.5. receive your Personal Data, which the Data Subject has provided to Creditinfo and which is Processed on the basis of consent or for the performance of a contract, in a commonly used machine-readable format, and, if technically possible, transmit these Personal Data to another controller (data portability);

16.1.6. to object to the Processing of your Personal Data, including profiling, if the Processing of Personal Data is based on legitimate interest. In such a case, Creditinfo will terminate the Processing of the Data Subject's Personal Data, unless Creditinfo's legitimate interest outweighs the potential infringement of the Data Subject's interests, rights and freedoms;

16.1.7. demand the termination of the Processing of your Personal Data if the Processing of Personal Data is carried out unlawfully, i.e. Creditinfo has no legal basis for the Processing of Personal Data;

16.1.8. withdraw your consent to the Processing of your Personal Data;

16.1.9. submit a complaint to Creditinfo regarding the Processing of Personal Data if the Data Subject finds that the Processing of his/her Personal Data violates his/her interests, fundamental rights and freedoms;

16.1.10. file a complaint regarding the Processing of Personal Data with the Data Protection Inspectorate in accordance with the instructions at www.aki.ee or contact a competent court if the Data Subject finds that the Processing of his/her Personal Data violates his/her rights and interests.

16.2. To exercise their rights, the Data Subject can contact Creditinfo by sending their inquiry, request or complaint to the e-mail address andmekaitse@creditinfo.ee in a form that allows the Data Subject to be identified or using My Creditinfo portal. Creditinfo will respond to the Data Subject without delay, but no later than one month from the date of receipt of the request. If it is necessary to specify or verify the circumstances in more detail before responding to the Data Subject, Creditinfo may extend the response deadline by informing the Data Subject in advance.

17. CHANGING PRINCIPLES

17.1. Creditinfo may update and supplement the Principles. Creditinfo will notify Data Subjects and other persons of changes to the Principles via the Creditinfo Website where the new version of the Principles will be published.

This English translation is provided for informational purposes only. In case of discrepancies, the Estonian version shall prevail.