

## INFORMATION CLAUSE ON THE PROCESSING OF PERSONAL DATA

In connection with the implementation of the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter: GDPR), we hereby inform you about the principles of processing your personal data and about your rights related thereto.

If you have any questions regarding the manner and scope of processing your personal data, as well as your rights in this regard, you may contact the Data Controller via e-mail: [gdpr@deltawise.eu](mailto:gdpr@deltawise.eu).

### DATA CONTROLLER

The controller of your personal data is DeltaWise OÜ, with its registered office in Tallinn (Republic of Estonia), registered in accordance with Estonian law in the Tartu County Court Registration Department under number 12922325, registered office address: Narva mnt 7, Kesklinna district, Tallinn city, Harju county, 10117, Estonia (hereinafter: DeltaWise OÜ).

### LEGAL BASIS AND PURPOSES OF PROCESSING

The Data Controller processes your personal data on the following grounds:

- a. article 6(1)(b) GDPR – processing is necessary for the performance of a contract under which DeltaWise OÜ has assumed the rights and obligations of the original creditor, in particular for the purpose of managing the claim and arranging repayment of the outstanding amount;
- b. article 6(1)(c) GDPR – processing is necessary for compliance with legal obligations, including tax, accounting and other regulations applicable to DeltaWise OÜ, in particular in connection with the acquisition, repayment arrangements and settlement of the acquired claim;
- c. article 6(1)(f) GDPR – processing is necessary for the purposes of the legitimate interests pursued by DeltaWise OÜ, namely conducting business activities involving the acquisition and recovery of claims, their further sale, protection against third-party claims, including handling complaints, requests or claims, as well as for statistical purposes.

### SOURCE OF PERSONAL DATA

Your personal data has been obtained in connection with DeltaWise OÜ assuming the rights and obligations of the creditor under an assignment agreement concluded with the original creditor. The data may also originate from documents and information provided directly by you or be obtained from public administration authorities, registers, and other publicly available sources of information.

### TYPE OF PERSONAL DATA PROCESSED

The personal data processed includes information such as first name, last name, PESEL identification number, identity card series and number, registered and correspondence address, telephone numbers, e-mail addresses, data relating to the basis of the claim, as well as other data identifying the claim and the debtor. The categories of personal data collected by DeltaWise OÜ include standard personal data.

## SHARING OF PERSONAL DATA

1. In connection with the processing of personal data, the recipients of your personal data may include:
  - a. public authorities, including judicial bodies, as well as entities conducting enforcement proceedings or acting on behalf of such authorities, to the extent and for the purposes arising from generally applicable law;
  - b. other entities that process personal data on behalf of DeltaWise OÜ under appropriate agreements concluded with the Data Controller, e.g., entities providing postal services, entities managing ICT systems;
  - c. banks and other institutions providing financial and payment services.
2. Personal data may be processed across borders, in particular in situations where DeltaWise OÜ is the legal creditor and undertakes actions aimed at arranging repayment of claims within the territory of the Republic of Poland.
3. In certain cases, personal data may be transferred to countries outside the European Economic Area, in particular in connection with DeltaWise OÜ's use of IT infrastructure service providers, but only to countries ensuring an adequate level of data protection. To guarantee an appropriate level of protection, DeltaWise OÜ applies technical and organizational measures to secure the transferred personal data. In the absence of a European Commission decision confirming an adequate level of protection in a given country, DeltaWise OÜ, in particular, concludes so-called standard contractual clauses issued by the European Commission pursuant to Article 46(2)(c) GDPR, ensuring the security of the transferred personal data.

## AUTOMATED PROCESSING OF PERSONAL DATA

Personal data may be processed in an automated manner in accordance with applicable law, in particular for the purpose of appropriately adjusting actions aimed at arranging repayment of the claim acquired by DeltaWise OÜ. No decisions concerning you are made in an automated manner.

## DATA RETENTION PERIOD

Personal data will be retained by DeltaWise OÜ:

- a. until the legal obligations imposed on the Data Controller under applicable law have been fulfilled,
- b. until the expiry of mutual claims

– the data will be stored until the occurrence of the event that takes place later.

## RIGHTS RELATED TO THE PROCESSING OF PERSONAL DATA

In connection with the processing of your personal data by DeltaWise OÜ, you have the following rights:

- a. the right of access to personal data, including the right to request a copy of the data processed by DeltaWise OÜ;
- b. the right to request the updating, rectification, and completion of personal data – if the data is incorrect or incomplete;
- c. the right to request the erasure of personal data (the right to be forgotten), if:
  - the data is no longer necessary for the purposes for which it was collected or otherwise processed,
  - the personal data is processed unlawfully;
- d. the right to request the restriction of the processing of personal data;
- e. the right to data portability to another controller;
- f. the right to object to the processing of data;

- g. the right to lodge a complaint with the Data Controller – DeltaWise OÜ:
  - e-mail: [gdpr@deltawise.eu](mailto:gdpr@deltawise.eu);
- h. the right to lodge a complaint with a supervisory authority responsible for personal data protection in the Member State of your habitual residence, place of work, or place of the alleged infringement, including:
  - Poland: Prezes Urzędu Ochrony Danych Osobowych (PUODO), ul. Stanisława Moniuszki 1A, 00-014 Warszawa, e-mail: [kancelaria@uodo.gov.pl](mailto:kancelaria@uodo.gov.pl),
  - Estonia: Andmekaitse Inspeksiõon, Tatari 39, 10134 Tallinn, e-mail: [info@aki.ee](mailto:info@aki.ee).

**AMENDMENT OF THE INFORMATION CLAUSE**

As DeltaWise OÜ regularly reviews its processes, it may update the content of the Information Clause on the processing of personal data. DeltaWise OÜ will provide reasonable notice of any significant changes by publishing the updated content on the website [www.deltawise.eu](http://www.deltawise.eu) and, if necessary, via e-mail.

This version of the Information Clause is applicable as of 2 December 2025.