

## PRIVACY POLICY

### **GENERAL INFORMATION**

DeltaWise OÜ, registered with the Tartu County Court Registration Department under number 12922325 and having its registered office at Narva mnt 7, 10117 Tallinn (Estonia), as the Data Controller, processes personal data in accordance with applicable national laws and European Union regulations. DeltaWise OÜ prioritizes the security of personal data, ensuring its confidentiality, integrity, availability, and accountability of all processing activities. To guarantee transparency of processes, this Privacy Policy sets out the key principles of data processing in compliance with 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 referred to as GDPR.

### **SERVICE**

Whenever this Privacy Policy refers to the Service, it shall mean the website available at [www.deltawise.eu](http://www.deltawise.eu).

### **PERSONAL DATA CONTROLLER**

The entity determining the purposes and means of processing personal data is DeltaWise OÜ, with its registered office in Tallinn, Narva mnt 7, postal code 10117 Tallinn (Estonia), hereinafter referred to as DeltaWise OÜ. For matters related to the processing of personal data, you may contact us via email at: [gdpr@deltawise.eu](mailto:gdpr@deltawise.eu).

### **SOURCE OF PERSONAL DATA**

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. 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.

### **PURPOSE AND LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA**

In connection with its business activities, DeltaWise OÜ processes and stores personal data based on the following legal grounds, as appropriate to the purpose of processing:

1. Purpose of processing:
  - a. performance of the agreement under which DeltaWise OÜ assumed the rights and obligations of the original creditor, in particular for the purpose of managing receivables and pursuing payment of amounts due:
    - legal basis: article 6(1)(b) GDPR – processing of personal data is necessary for the performance of the agreement under which DeltaWise OÜ assumed the rights and obligations of the original creditor, in particular for the purpose of managing receivables and pursuing payment of amounts due;
  - b. conducting settlements, accounting, and financial reporting:
    - legal basis: article 6(1)(c) GDPR – processing of personal data is necessary for compliance with legal obligations imposed on DeltaWise OÜ, in particular in connection with the acquisition, recovery, and settlement of the acquired receivable;

- c. pursuing legitimate interests of DeltaWise OÜ:
  - legal basis: article 6(1)(f) GDPR – processing of personal data is necessary for the purposes of the legitimate interests pursued by DeltaWise OÜ in connection with its business activities related to the acquisition and recovery of receivables, their further sale, protection against third-party claims, as well as for statistical purposes.
- d. handling complaints, requests, and claims:
  - legal basis: article 6(1)(f) GDPR – processing of personal data for the purpose of handling a submitted complaint, request, or claim.

## 2. Retention period for personal data:

- a. until the fulfillment of legal obligations imposed on DeltaWise OÜ under applicable law,
- b. until the expiration of mutual claims

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

*Individuals who have provided DeltaWise OÜ with personal data of third parties in connection with activities related to the use of the Service are obliged to inform such third parties of the information contained in this Privacy Policy.*

## **TYPE OF PERSONAL DATA PROCESSED**

The personal data subject to processing includes information such as first name, last name, PESEL identification number, identity card series and number, registered and correspondence address, telephone numbers, email addresses, data relating to the basis of the claim, as well as other data identifying the receivable and the debtor. The categories of personal data obtained by DeltaWise OÜ comprise standard personal data.

## **ENTITIES RECEIVING PERSONAL DATA**

In connection with its business activities, DeltaWise OÜ may disclose personal data to the following entities:

- a. state authorities or other entities authorized under applicable law – if necessary to fulfill legal obligations;
- b. entities acting on behalf of DeltaWise OÜ, in particular: external IT system providers, subcontractors, entities conducting audits of DeltaWise OÜ or appraisers, provided that such entities process personal data under an agreement concluded with DeltaWise OÜ and strictly in accordance with its instructions;
- c. entities providing accounting, HR, or legal services – to the extent necessary to ensure compliance with legal obligations or for the establishment, exercise, and defense of claims;
- d. banks and other financial and payment institution;
- e. entities providing postal services;
- f. entities cooperating with DeltaWise OÜ to enable Service Clients to provide feedback on DeltaWise OÜ's services.

Personal data may be processed across borders, particularly in situations where DeltaWise OÜ is the legal creditor and undertakes actions aimed at recovering receivables within the territory of the Republic of Poland.

## **TRANSFER OF DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS**

In certain cases, personal data may be transferred to countries outside the European Economic Area, particularly 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 aimed at securing 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 in accordance with 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, particularly for the purpose of appropriately tailoring actions aimed at recovering receivables acquired by DeltaWise OÜ. Decisions concerning the debtor are not made in an automated way.

#### **RIGHTS REGARDING THE PROCESSING OF PERSONAL DATA**

Every individual whose data is processed by DeltaWise OÜ has the right to:

- a. access their personal data;
- b. rectify their personal data;
- c. erase their personal data;
- d. restrict the processing of their personal data;
- e. object to the processing of their personal data (in accordance with article 21(1) GDPR, the objection must indicate reasons related to the individual's particular situation);
- f. data portability;
- g. lodge a complaint with the Data Controller – DeltaWise OÜ:
  - e-mail: [gdpr@deltawise.eu](mailto:gdpr@deltawise.eu);
- h. lodge a complaint with the supervisory authority responsible for data protection in the Member State of 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 Inspektsioon, Tatari 39, 10134 Tallinn, e-mail: [info@aki.ee](mailto:info@aki.ee).

More details regarding the rights of data subjects can be found in articles 12–23 of the GDPR, the full text of which is available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32016R0679>

#### **CHANGES TO THE PRIVACY POLICY**

As DeltaWise OÜ regularly reviews its processes and updates the Privacy Policy, changes may occur. DeltaWise OÜ will provide advance notice of any changes to the Privacy Policy through the Service or via email communication.

This Privacy Policy is effective as of 02 December 2025.