

Privacy Statement

MAY 2021

coeo takes your privacy seriously and processes and uses your information in such a way that the integrity of your information is guaranteed as much as possible. With the advent of the General Data Protection Regulation (GDPR), we realise that privacy rights have become more important than ever.

This Privacy Statement is intended to answer the following questions:

1. Who is coeo?
2. Which parties provide coeo with your personal data?
3. What personal data does coeo process?
4. For what purposes does coeo process your data?
5. Who else is coeo allowed to disclose your personal data to?
6. How long does coeo store your personal data?
7. How does coeo protect your personal data?
8. What rights do you have regarding the processing of your personal data?
9. Where can you ask questions and file reports?
10. When does this Privacy Statement change?

1. Who is coeo?

coeo is a credit management organisation - in the vernacular: a 'collection agency' - which mainly deals with the collection of debts on behalf of companies, (municipal) authorities as well as private persons. The coeo B.V. head office is located in Rotterdam at Wilhelminakade 159 and the company is registered in the trade register of the Chamber of Commerce under number 24470897.

Company data overview

coeo B.V.
Leonardo da Vincilaan 19a
1831 Diegem, Belgium
03 808 68 72
info@coeo-incasso.be
Trade Register: 221369

coeo B.V.
Wilhelminakade 159
3072 AP Rotterdam, The Netherlands
010 - 41 45 444
info@coeo-incasso.nl
Trade Register: 24470897

2. Which parties provide coeo with your personal data?

Coeo may get access to your personal data in several ways.

- The first way in which coeo obtains your personal data is from our clients. Our clients, who issue us with debt collection orders, have concluded agreements with our company, as a result of which the rules regarding the use of your personal data are strictly monitored.
- The second way in which coeo may receive personal data about you is through partners such as trade information bureaus, data validation agencies, but also through publicly accessible sources such as the telephone directory, the guardianship register, administration register and insolvency register and social media. Given the nature of coeo's services, coeo uses the aforementioned parties to contact you if there is a supposition that the correspondence data used by coeo is incorrect, incomplete or insufficient to be able to correspond with you about our client's claim.
- The third way in which coeo may receive your personal data is when you have provided it to our office either independently or through an authorised representative via the websites www.coeo-incasso.nl or www.app.coeo-incasso.nl, by email, by telephone or in any other way, for example if you give us a collection order or if you wish to communicate with us using a new correspondence address.
- The fourth way in which coeo may receive your personal data is through your visit to the coeo website. The website uses cookies, which can collect information about your surfing behaviour. Under the GDPR, the data these cookies collect is also personal data. More information about the use of cookies can be found in the [Cookie Policy](#).

If your data is obtained in any other way than described above, the restrictions on the use of such personal data as set out in this Privacy Statement apply in full. coeo will use your personal data as carefully as possible, regardless of the source.

3. What personal data does coeo process?

coeo distinguishes between personal data and anonymous data. **Personal data** is information from which your identity can be derived, such as your name, address, email address, telephone number and age. **Anonymous data** is data that cannot be traced back to your identity.

coeo collects the following (personal) data from you:

- Name;
- Gender;
- Date of birth;
- Address, residence, country;
- (mobile) telephone number(s);
- Email address(es);

- Services/goods provided regarding the outstanding claim;
- Financial data, such as bank account number and salutation.

When you visit our websites, device information such as your IP address, language and browser settings, time zone, operating system, platform and screen resolution is also collected.

If it is deemed necessary for the purposes of providing evidence in or out of court, correspondence you have entered into with us or with our clients or third parties affiliated with our clients, as well as other evidence not falling into the above categories, may also be collected and processed. In order to advise our clients, we may also seek to gather information about your financial conduct and creditworthiness.

It may also happen that you voluntarily provide us with data, for example about your financial situation in order to agree on a tailor-made payment schedule with our office.

4. For what purposes does coeo process your data?

coeo uses the personal data collected in order to realise the purposes set out below. For each purpose, we also note the legal basis for the processing.

Purpose of processing	Legal basis of processing
The administration, management and collection of invoices and claims against natural and legal persons for our clients and for our own debtor management.	Performance of the agreement and pursuit of legitimate interests.
To correct or supplement missing or erroneous personal and/or correspondence data with the correct data in order to enable clients to establish contact in order to avoid over-crediting and increased costs.	Performance of the agreement and pursuit of legitimate interests.
Determining a risk model and score on the basis of current and historical data relating to debt collection with which the probability of recoverability of receivables can be determined;	Pursuit of legitimate interests.
Optimising the collection service to our clients;	Pursuit of legitimate interests.
Supporting organisations exposed to credit risks in making decisions about selecting potential clients, entering into or continuing or terminating commercial transactions, whether or not subject to certain conditions, determining the possibilities of recovery, collection and recourse and collecting and processing data on natural persons for the purpose of compiling credit management reports, including	Pursuit of legitimate interests.

reports on payment possibilities, acceptance, recovery, collection and recourse information, in the context of lending and credit collection.	
Further processing (storage and use) of the personal data for the purpose of compiling (possible) future credit management reports, including reports on payment possibilities, acceptance, recovery, collection and recourse information, and (possible) future recovery and collection actions.	Pursuit of legitimate interests.
Supporting clients in making decisions regarding judicial and extrajudicial and enforcement actions;	Pursuit of legitimate interests.
Preventing, detecting and tracing fraud and fraudsters in order to recover any damage from the right person or persons on behalf of our clients.	Pursuit of legitimate interests.
To make your visit to the coeo websites as fast, user-friendly and quick as possible by using cookies;	Consent and pursuit of legitimate interest.

5. Who else is coeo allowed to disclose your personal data to?

coeo may provide data to third parties to the extent that this is necessary for the provision of our services and/or to the extent that this data cannot be traced back to you personally (such as automatically generated information, not the IP address). Thus, the data will be provided, inter alia, to persons and bodies entitled to obtain or have access to such data.

coeo may also make your data available to third parties involved in the processing and implementation of the objectives of coeo and its companies within the legal structure of which coeo is a part. coeo may also make your data available to third parties in order to support the preparation and/or settlement of decisions taken by third parties concerning the entering into, fleshing out and termination of commercial and employment relations. This data will only be provided to third parties that apply conditions with at least an equivalent level of protection of personal data as the conditions of coeo and have concluded a processing agreement with coeo.

Our bailiffs will obtain information about you in order to carry out their official duties - such as service of procedural documents and the enforcement of court judgements - as well as non-official tasks - such as home visits. Our lawyers will obtain information about you in order to compile a file and provide legal advice.

If it appears that your data may be outdated, incorrect or incomplete, we may request trade information companies to complete your data so that we can get in touch with you as soon as possible regarding our clients' claims. In the event that coeo has to provide advice to its clients within the framework of your

creditworthiness, coeo may provide your data to **Economic Data Resources B.V.** (EDR) for verification for the purposes of initiating legal proceedings. EDR will give an opinion on your creditworthiness on the basis of this data.

EDR uses your data for researching your creditworthiness and contact details. In addition, all your data regarding your payment behaviour is shared with EDR in the context of countering payment risks and preventing problematic debts. This means that if services have been stopped due to late payment, this information may have consequences for the conclusion of other agreements with (financial) obligations. If you wish to object or obtain information about the use of your personal data by EDR, please see: <https://www.edrcreditservices.nl/privacy-statement/>.

6. How long does coeo store your personal data?

coeo does not retain personal data any longer than is necessary to fulfil our contractual obligations towards our client, to serve legitimate interests and to act in accordance with statutory retention periods. If coeo retains your data for longer than is strictly necessary for performance of the agreement or our legitimate interests - such as combating fraud or preventing overlending - we will only do so for as long as is legally required for the relevant purpose as shown in the above overview.

In principle, we retain your data for a period of five years in connection with files already closed, which is the limitation period for monetary claims, including undue payments. In the event that your data relates to a court judgment that has not yet been fully enforced, this may be up to 20 years, the same as the limitation period for judgments.

coeo also retains your data in the context of the legal tax retention obligation, but limits the data retained to only that data that is strictly necessary to fulfil this retention obligation. coeo aims to anonymise your data as far as possible within the framework of this retention obligation.

7. How does coeo protect your personal data?

coeo takes appropriate technical and organisational measures to protect your (personal) data against loss or any form of unlawful processing. Your data will therefore be protected to the best of our ability and treated confidentially at all times. coeo makes use of https connections for our digital processing, furnished with SSH and/or SSL certificates.

Personal data is stored in databases, which are located on servers in a data centre. This data centre is protected against physical access by means of strict access control. Digitally, the databases are password protected, the servers are also secured and only accessible with the correct database credentials. Clients are only entitled to view the data relating to the orders of the respective client. Employees can only view the data that is necessary for the proper performance of their daily work.

8. What rights do you have regarding the processing of your personal data?

The General Data Protection Regulation ensures that you have the following rights with regard to the processing of your personal data:

- **The right to data portability:** The right to receive personal data from us in a transferable manner. coeo aims to inform you by means of PDF (Portable Document Format), a standard file format of Adobe Systems.
- **The right to deletion:** Also called the right to 'be forgotten'. You have the right to request deletion of your personal data insofar as this data is no longer necessary for the purpose for which it was collected.
- **The right to inspection:** You can request an overview of the personal data that coeo has on you. This overview will be provided to you free of charge, unless this requires a disproportionate effort on the part of coeo.
- **The right to rectification and completion:** The right to correct the personal data you process. You have the right to have incorrect and/or incomplete information about yourself corrected.
- **The right to restrict processing:** The right to have less data processed than is processed by coeo.
- **The right relating to automated decision-making and profiling:** This includes the right to a human perspective when making decisions concerning your personal data. If you believe that a decision taken as a result of an automated process could be different if it had been handled manually, you can submit a request to coeo.
- **The right to object to data processing:** You have the right to object to the processing of your personal data in connection with special personal circumstances. coeo will assess whether the objection is justified within four weeks of receiving it. If coeo considers the objection justified, it will cease processing immediately. In the event that we are unable to comply with your request, we will block the data we must retain for use other than to fulfil the above (legal) obligations.

Please note!

- Without a means of identification - such as a copy of your passport or identity card - which enables coeo to establish your identity unambiguously, it is possible that coeo will not be able to fulfil or substantively answer your request with regard to the invocation of the aforementioned rights, as we are unable to establish whether the rightful parties involved are doing so lawfully. Your means of identification will not be kept longer than necessary to assess your claim, unless you agree that we keep it for a longer period.
- Because coeo is a credit management organisation affiliated with the Dutch Association of Certified Debt Collectors, we have certain obligations and core activities that prevent us from deleting certain personal data, limit the processing or supplement with information that we are not allowed to process. In the event that your request cannot be complied with, coeo will inform you of the grounds on which this is the case or cannot be done, in accordance with Article 41(1)(j) of the GDPR Implementation Act.
- A dispute regarding an outstanding claim of a client in the context of a pending file does not affect the legitimate interests of coeo and/or our client in processing your personal data. A request for inspection/deletion does not have a suspensive effect on our work for our client.

9. Where can you ask questions and file reports?

If you have any questions about this Privacy Statement, please send an email to privacy@coeo-incasso.nl, stating as the subject **Re Processing of Personal Data** and - if applicable - your file number. Alternatively, you may write to us using the address given at the top of this statement, for the attention of the **Personal Data Department** as mentioned at the bottom of this paragraph.

Requests for inspection or when invoking one or more of the aforementioned rights should preferably be made under enclosure of a copy of a valid identification document. We recommend that you make the information that is not necessary for us - such as your social security number or document number - illegible in your copy and date it.

coeo will answer your requests within a period of four weeks. If a request for inspection is complied with, for example, an as complete as possible overview of your personal data in the processing operations that have been notified will be provided within four weeks.

If coeo has complied with a request to correct, supplement, delete or block data, it will notify third parties to whom this data has been supplied of the changes made. coeo does not have to comply if this is impossible or requires a disproportionate effort.

For complaints about the way your personal data is processed, please contact privacy@coeo-incasso.nl. In this context, please provide us with sufficient references to process your complaint in good order, such as your file number and the name of the client concerned. If you are not satisfied with the solution offered by our internal complaints procedure, you also have the option of submitting a complaint or a report to the Dutch regulator, the [Dutch Data Protection Authority](#).

Our Data Protection Officer Rochelle van Rikxoort can be contacted at the following address:

coeo
Attn. Rochelle van Rikxoort / Data Protection Officer
Wilhelminakade 159
3072 DE Rotterdam

10. When does this Privacy Statement change?

coeo reserves the right to make changes to the Privacy Statement, for example due to new developments or online services. It is therefore recommended that you consult this Privacy Statement regularly.