



PRIVACY POLICY – DEBT COLLECTION ACTIVITIES

doValue S.p.A. (C.F.: 00390840239 – the "**Company**") provides the following information on the processing (the "**Processing**") of personal data (the "**Data**") of debtors, co-debtors, guarantors and persons connected to them (the "**Data Subjects**") carried out by the Company during the execution of debt collection activities on behalf of third parties.

1. Identity and contact details of the Data Controller (the "**Controller**").

The Data Controller is the Company, as identified above, which can be contacted:

- by traditional mail to the address "doValue S.p.A. - viale dell'Agricoltura, 7 (37135) Verona";
- by e-mail to dovalue.pec@actaliscertymail.it.

2. Contact details of the data protection officer (the "**DPO**").

The DPO can be contacted at the e-mail address dpo@dovalue.it.

3. Categories of Data and the source from which they originate.

Data may include:

- Identification data (e.g., first and last name);
- Contact details (e.g. postal address);
- Data relating to the relationships between the parties involved in debt collection practices;
- Data relating to identification and/or identification documents;
- Data relating to the debt subject to recovery;
- Data relating to the economic and/or financial situation;
- Data relating to payments made and/or the outcome of the debt collection procedure;
- Data relating to any judicial credit protection procedures initiated;
- Data relating to the origin of the funds used to settle debts;
- information relating to the presence of criminal proceedings or other relevant risk indices pursuant to the legislation on combating money laundering and terrorist financing (the "**Anti-Money Laundering Legislation**"), including the qualification of politically exposed person, as well as the risk profile assigned pursuant to the same Anti-Money Laundering Legislation.

Data may be collected:

- at the Data Subject's premises;
- at the clients of the debt collection services and/or their successors and/or assignors;
- with other parties connected to the Data Subject and/or to the debt collection file (for example, attorneys);

doValue S.p.A.

già doBank S.p.A.

Viale dell'Agricoltura, 7 – 37135 Verona (VR)

T: 800 44 33 94 – F: +39 045 8764 831

Mail: infodvl@dovalue.it

dovalue.pec@actaliscertymail.it

Sito web: www.dovalue.it

Sede Legale in Verona, Viale dell'Agricoltura, 7 – Iscrizione al Registro Imprese CCIAA di Verona CCIAA/NREA: VR/19260
Codice Fiscale n° 00390840239 e Partita IVA n° 02659940239 – Capitale Sociale € 68.614.035,50 interamente versato.



- from public sources (registry office, chamber of commerce, etc.) and/or publicly accessible (for example, press reports);
- at commercial information and/or private investigation institutes.

4. Purpose and legal basis of the Processing and nature of the provision of Data.

The Processing is carried out for:

a) fulfil:

- the obligations to store and record information relating to debt collection activities provided for by public security legislation;
- the obligations to retain Data, documents and information relating to the transactions carried out and useful for preventing, identifying or ascertaining any money laundering or terrorist financing activities, in accordance with the provisions of the Anti-Money Laundering Legislation;
- other mandatory regulations applicable to the Company other than those listed above (for example, tax obligations and/or cooperation with public authorities, such as the Revenue Agency, the judicial police, the Bank of Italy, etc.).

The relevant legal basis of the Processing is precisely the need to comply with a legal obligation to which the Data Controller is subject;

- b) allow doValue to respond to any requests or objections from customers, public authorities and/or third parties relating to the management of debt collection practices, received even after the closure of the relevant service contract. The relevant legal basis of the processing is constituted by the legitimate interest of the Data Controller and the principals in the correct, effective and efficient management of debt collection activities, as well as by the legitimate interest of the Data Controller itself in the defence and exercise of its rights and legitimate interests in court and/or out of court;
- c) verify the correct and regular performance of the activities entrusted to external consultants and suppliers, to assert doValue's rights and fulfil its obligations towards such consultants and suppliers. The relevant legal basis of the Processing is constituted by the legitimate interest of the Data Controller in the correct, effective and efficient management of relations with suppliers involved in the processing of the debt collection file, as well as by the legitimate interest of the Data Controller in the defence and exercise of its rights and legitimate interests in court and/or out of court.

The provision of Data by the Data Subject is usually optional, except in certain cases related to the management of payments and/or administrative and/or judicial activities in which such provision is mandatory pursuant to Anti-Money Laundering Legislation and/or tax regulations.

5. Recipients of the Data.

The Data may be communicated by doValue to:

- consultants and suppliers of services instrumental to the pursuit of the aforementioned purposes;



- customers and business partners and their assignees, including any assignees of the receivables subject to recovery activities;
- other companies of the business group to which they belong for administrative-accounting reasons;
- authorities and/or public bodies to comply with legal obligations and/or pursue defensive needs.

As a rule, the Data will not be transferred to third countries that are not part of the European Economic Area or international organizations. Should this exceptionally occur, the transfer will take place in accordance with the provisions of art. 44 et seq. of Reg. (EU) 2016/679, taking into account the case law of the Court of Justice of the European Union and the guidelines of the European Data Protection Board on the subject.

6. Data retention period.

The Data will normally be kept for ten years starting from the termination of the debt collection services contract to which each debt position refers. It is understood that, with regard to the defensive purposes listed above, when there is a concrete dispute or claim that determines the need to process the Data to defend the rights of doValue, the ordinary rules on the interruption and suspension of the statute of limitations apply, with the consequent redetermination of the initial term of the Data retention period.

7. Automated decision-making.

The Data will not be used as part of automated decision-making.

8. Rights of Data Subjects.

In the presence of the relevant regulatory and factual prerequisites, the Data Subject has the right to ask the Data Controller for access to the Data and the correction or cancellation of the same or the limitation of the Data Processing. In addition, the data subject has the right to object to the Processing itself, for reasons related to his or her particular situation. Finally, the Data Subject has the right to lodge a complaint with the competent supervisory authority (for Italy, the Italian Data Protection Authority).