

Privacy notice for individuals who have a payment default entry or other information mentioned in articles 12, 13 or 23 of Credit Information Act in Suomen Asiakastieto Oy credit registers

This privacy notice describes the processing of personal data by Suomen Asiakastieto Oy concerning data subjects for whom we have recorded a payment default entry or other information based on article 12, 13 or 23 of Credit Information Act in Suomen Asiakastieto Oy credit registers.

1. **Controller: Suomen Asiakastieto Oy**, Elielinaukio 5 B, PL 16, 00100 Helsinki, www.asiakastieto.fi, www.omatieto.fi Suomen Asiakastieto Oy is part of Enento Group Plc, Elielinaukio 5 B, PL 16, 00100 Helsinki www.enento.com

2. Personal data which is processed

- Your name, ID number or birthday and mail address
- Type of payment default entry
- Amount of your debt and name of the debtor
- Registration day of the payment default entry
- Information on your legal capacity if it has been limited or if you have been appointed a guardian
- Information on possible credit ban
- As information on possible bankruptcy the information on the debtor that has been recorded in the Register of Bankruptcies and Restructurings
- As information on possible debt adjustments the information on the debtor that has been recorded in the Register of Debt Adjustments
- As information on possible defaults of payment established by an authority information on defaults of payment that have been established by a final judgment of a court provided that the amount or grounds of the demand for payment have not been disputed, by a default judgment or a judgment to extend the time limit for the ground for enforcement or by a protest of a registered bill of exchange approved by the debtor
- As information on possible enforcement information broken down by case on such enforcement matters in which an impediment certificate has been issued or information on long-term enforcement
- As information on possible defaults of payment reported by the creditor information on a failure to make a payment based on a consumer credit agreement
- As information on possible defaults of payment admitted by the debtor information on a written notice in which the debtor admits their failure to make a payment issued in connection with an agreement on a payment arrangement made with several creditors or that is otherwise extensive
- As information on possible completed payments information on the performance of a payment obligation that was subject to a payment default entry, when the information has been disclosed to Asiakastieto in accordance with the obligation laid

down in law, when the debtor has requested that the information be entered in the credit information register and has submitted reliable evidence that the payment has been completed, or when Asiakastieto otherwise receives information on the payment

- As information on possible creditworthiness assessments information on a rating or other assessment of creditworthiness
- As information on prohibition on pursuing a business, information about the prohibition and it's duration
- Information on what businesses you are or have been responsible for • Recordings of the phone calls with you that have been recorded

When you visit our website we will collect e.g.

- data about how you use our website
- technical data concerning your browser and your IP address

3. Purposes for processing your personal data

We process your personal data

- to provide credit register services to our customers including creditworthiness assessments
- for research and statistical purposes
- to send you possible customer feedback survey after you've contacted us

4. Legal basis for processing your personal data

We process your personal data for credit register services based on GDPR article 6.1 e and public interest. This processing is regulated by Credit Information Act which based on GDPR recital 45 forms a legal basis meant in article 6.1 e of the GDPR. We also process your personal data for research and statistical purposes based on GDPR article 6.1 and public interest. In addition your personal data is processed to send you possible customer feedback survey based on GDPR article 6.1 f and legitimate interest of Asiakastieto.

5. Special categories of personal data and personal data relating to criminal convictions and offences

We don't process sensitive category personal data or data relating to criminal convictions and offences concerning you.

6. Collection of your personal data

We collect personal data concerning you from other sources which are

- Creditors providing consumer credits: Consumer credits failures
- District courts: Information on defaults of payment established by an authority

- Credit- and financing institutions and other creditors providing and guaranteeing credits: Information on defaults of payment admitted by the debtor
- Legal Register Center: Information on debt adjustments, information on bankruptcy and information on prohibition on pursuing a business
- Data subjects: Information on completed payments and additional information concerning debts
- Enforcement authority: Information on enforcement and insolvency, information on completed payments
- Creditors: Information on completed payments
- Tax authorities: Information on withholding tax and value-added tax
- Digital and population data services agency: Information on legal capacity
- Trade register: Information on what businesses a natural person is or has been responsible for

We collect your personal data from you when you contact us or register to use a service. You can give your contact details to us by filling in a form on our website, buying a service or contacting us by calling or by using chat on the website.

7. Third parties that we disclose your personal data to inside EU/EEA

Personal credit information are disclosed based on the contract with our customers for granting or monitoring credit and for other purposes explained in Article 19 of Credit Information Act. Your personal data may also be disclosed to our processors to be processed on our behalf.

8. Transfers of personal data outside EU/EEA area

Your personal data may in some situations be disclosed outside EU/EEA area for example to the processors we use. In these situations we ensure that your personal data is secured to an adequate level. We also use Standard Contractual Clauses and other measures to protect your personal data.

9. Profiling and automated decision-making

- Asiakastieto may formulate a credit rating or other assessment information indicating your creditworthiness that can be obtained from a credit information register. Asiakastieto can only use the below listed information about you to make these assessments:
 - information concerning your legal capacity
 - information about possible credit ban
 - information on what businesses you are or have been responsible for
 - information on possible bankruptcy
 - information on possible debt adjustments
 - information on defaults of payment established by an authority
 - information on enforcement

- information on defaults of payment reported by the creditor
- information on defaults of payment admitted by the debtor
- information on public notices, information on completed payments
- information on creditworthiness assessments
- If the formulation of your credit rating is based solely on automated data processing, you have the right to express an opinion on the credit rating and request that the rating be reassessed by Asiakastieto.

10. Retention periods

- Your name, ID number or birthday and mail address are deleted when all other data concerning you is deleted
- Information on legal capacity is deleted within one month of the information being deleted from Digital and population data services agency
- Information about possible credit ban is deleted as soon as you request its deletion.
- Information on bankruptcy will be deleted within one month of the information being deleted from the Register of Bankruptcies and Restructurings; however, the information shall be deleted no later than five years from the commencement of bankruptcy.
- Information on debt adjustments will be deleted within one month of the corresponding entries being deleted from the authority register they were originally made in.
- Information on enforcement is deleted as soon as an enforcement officer has given a cancellation notification concerning long-term or unfounded enforcement.
- Other information on enforcement is deleted as soon as Asiakastieto has received information that the grounds for enforcement have been overturned, that the debtor has paid the debt subject to limited enforcement, that the time limit of the ground for enforcement has expired, that enforcement has ended due to the debt having become time-barred or that the judgement extending the time limit for enforcement has been repealed.
- Information on defaults of payment reported by the debtor and on defaults of payment admitted by the debtor are deleted within two years of the information being recorded in Asiakastieto register.
- Information on defaults of payment established by an authority and information on enforcement is deleted no later than three years from the date on which the information was recorded in Asiakastieto register (unless the information must be deleted earlier according to Credit Information Act).
- If Asiakastieto receives information that a debt, the payment default of which has resulted in an entry made based on a creditor's report or on defaults of payment admitted by the debtor or on defaults of payment established by an authority, has been paid, the entry shall be deleted within one month of the information on payment being received.

- Information on creditworthiness assessments shall be deleted when the other entries concerning you have been deleted from the register.
- Information on business interests will be deleted within one year of the date on which the entry concerning you being responsible for the business in question was removed from the authority's public register.

11. Your rights

You as the data subject whose personal data Asiakastieto is processing, have several different data subject rights towards us as the controller. Below you will find information on how to exercise these rights. We will process your request and respond to your request without undue delay and in any event within one month of receipt of the request.

- Right to information
 - When any of the data mentioned in this privacy notice concerning you are first added to Asiakastieto credit registers, we will send you an information letter via mail.
 - If the phone call with you is recorded, you will be informed about this at the beginning of the call.
- Right of access
 - If you want to control what information we have about you in the credit register, you can do that for free once a year by logging into www.omatieto.fi website.
 - If you want to know what other personal data we process about you, please send an email to omatieto@asiakastieto.fi. We also provide secure email which you can access here <https://mail.asiakastieto.fi/>. If you want to limit your request to certain type of data please communicate that in the email.
- Right to rectification
 - If you want to request rectification of incorrect personal data concerning you, please send an email to omatieto@asiakastieto.fi. We also provide secure email which you can access here <https://mail.asiakastieto.fi/>.
- Right to erasure
 - If you want to request erasure of personal data concerning you please send an email to omatieto@asiakastieto.fi. We also provide a secure email which you can access here <https://mail.asiakastieto.fi/>.
- Right to restriction of processing

- If you want to request restriction of processing of your personal data please send an email to omatieto@asiakastieto.fi. We also provide a secure email which you can access here <https://mail.asiakastieto.fi/>.
- Right to data portability
 - You don't have the right to data portability, since Asiakastieto is not processing your personal data based on consent or for performance of contract between you and Asiakastieto.
- Right to object
 - You have the right to object, on grounds to your particular situation, the processing of your personal data which is based on public interest (art 6.1 e) or legitimate interest (art 6.1 f).
 - If you want to exercise your right to object to processing please send an email to omatieto@asiakastieto.fi. We also provide a secure email which you can access here <https://mail.asiakastieto.fi/>.
- Rights concerning profiling
 - Please see also section 9. If the formulation of your credit rating is based solely on automated data processing, you have the right to express an opinion on the credit rating and request that the rating be reassessed by Asiakastieto.
 - If you want to exercise your rights concerning profiling please send an email to omatieto@asiakastieto.fi. We also provide a secure email which you can access here <https://mail.asiakastieto.fi/>.

12. Updating this privacy notice

This privacy notice can be updated time to time and new version will be published on this site.

13. Contact info and possible complaints

If you have questions about how we process your personal data, please contact our customer service at omatieto@asiakastieto.fi. We also provide a secure email which you can access here <https://mail.asiakastieto.fi/>.

Asiakastieto has appointed a Data Protection Officer. You can contact the DPO by sending email to [dpo\(a\)enento.com](mailto:dpo(a)enento.com).

If you are not satisfied with how we process your personal data, you have the right to file a complaint with supervisory authority, The Data Protection Ombudsman (Lintulahdenkuja 4, 00530 Helsinki, [tietosuoja\(a\)om.fi](mailto:tietosuoja(a)om.fi))

Privacy notice has been updated 02/2025