

Privacy Statement

JUNE 2024

One of the main priorities of coeo B.V. (hereinafter coeo) is to take your right to privacy seriously and to ensure the security of your personal data. Your personal information is used and stored in such a way that its integrity can be guaranteed as much as possible.

In this Privacy Statement, we would like to inform you about the following common questions regarding the processing of your personal data:

1. Who are we?
2. Which parties provide coeo with your personal data?
3. What personal data does coeo process?
4. For what purposes does coeo process your information?
5. To whom may coeo provide your personal data?
6. How long does coeo keep 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 to go for questions, complaints and notifications?
10. When will this Privacy Statement change?

1. Who are we?

Coeo is a credit management organisation - popularly known as a 'debt collection agency' - that mainly deals with debt collection on behalf of companies, (municipal) bodies and private individuals. The office of coeo is located in Ghent at Rooigemlaan 532 and our company is registered in the trade register of the Crossroads Bank for Enterprises under number 0788.981.865.

Company data overview:

Belgium	Netherlands
coeo B.V. Rooigemlaan 532 9000 Ghent Belgium Phone number: 03 808 68 72 General: info@coeo-incasso.be Privacy requests: privacy@coeo-incasso.nl Crossroads Bank registration number: 0788.981.865	coeo Incasso B.V. Wilhelminakade 153 3072 AP Rotterdam The Netherlands Phone number: +31 10 - 41 45 444 General: info@coeo-incasso.nl Privacy requests: fg@coeo-incasso.nl Trade Register registration number: 24470897

2. Which parties provide coeo with your personal data?

As part of our services, coeo may obtain access to your personal data in several ways. Below, we explain the three most common situations:

- **From our clients.** Our clients provide us with collection orders as creditors and have entered into agreements with our firm for this purpose, so the rules on the use of your personal data are strictly monitored.
- **Through partners such as trade information agencies, data validation offices and publicly accessible sources such as the telephone directory, the receivership, administration and insolvency register and social media.** Given the nature of coeo's services, coeo uses the aforementioned parties to reach you if it is suspected that the correspondence data used by coeo is inaccurate, incomplete or inadequate to correspond with you regarding our client's claim.
- **From yourself.** You can provide personal data to our office independently or through an authorised representative via the websites www.coeo-incasso.be, www.coeo-incasso.nl or app.coeo-incasso.nl, by e-mail, by telephone, by letter or in any other way, for instance if you give us a debt-collection order, if you wish to request a special payment arrangement, if you provide us with a new correspondence address, if you represent a client as a professional (lawyer, debt counsellor, etc.) or via the cookies placed during your visit to the websites of coeo. The website uses cookies, which may collect information about your browsing behaviour. Under the AVG - the General Data Protection Regulation - the data these cookies collect are also personal data. More information on the use of cookies can be found in the Cookie Policy.

If your data was obtained by any means other than those listed above, the restrictions regarding the use of such personal data as set out in this Privacy Statement shall 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 are data on the basis** of which your identity can be traced, such as your name, address, e-mail address, telephone number and age. **Anonymous data are data** that cannot (no longer) be traced back to your identity.

Coeo collects the following (personal) data from you:

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

- Services/goods provided regarding the outstanding claim to the extent that they can identify you;
- Financial data, such as bank account number or information on (problematic) debts;
- Personal data as recorded in the Commercial Register (NL) or Crossroads Bank (BE) if you are a (small) entrepreneur;
- Personal data which you provide yourself in the content of a letter, e-mail and telephone conversations held with our firm or our client.

In the case of your visit to our websites, device information such as your IP address, language and browser settings, time zone, operating system, platform and screen resolution is also collected through the use of Cookies and logging into our Customer Portal.

Other personal data

If deemed necessary for taking evidence in or out of court, we may also collect and process correspondence you have exchanged with us or with our clients and or third parties affiliated to our clients, as well as other evidence not falling into the categories listed above. In order to advise our clients, we may also seek to collect data on your financial dealings and creditworthiness. In particular, coeo may process the data about you recorded in the Central Credit Information System of the Bureau Krediet Registratie (BKR), if the collection order relates to the collection of a debt registered with the BKR, such as consumer credit.

4. For what purposes does coeo process your information?

Coeo uses the collected personal data to achieve the purposes mentioned below. For each purpose, we also note the legal basis for the processing.

Purpose of processing	Legal basis of processing
Administering, managing and collecting invoices and receivables from natural and legal persons for our clients and/or for our own accounts receivable management and administering corresponding payments.	Execution of the agreement and pursuit of legitimate interests.
Correct or supplement missing or incorrect personal and/or correspondence data with the correct data in order to enable our firm and our clients to establish contact with you to avoid overcrediting and unnecessary costs.	Pursuit of legitimate interests
Determining a risk model and score based on current and historical data related to debt collection, which can be used to determine the likelihood of recoverability of these receivables.	Pursuit of legitimate interests.
Recording letter and e-mail communications, storing Chatbot logs or recording incoming phone calls to you or our clients' employees, for the benefit of quality management and complaint handling.	Pursuit of legitimate interests.

Supporting organisations - exposed to credit risk - in making decisions on selecting potential clients, entering into or not entering into or continuing or terminating commercial transactions or under certain conditions, determining claim, collection and recovery possibilities, and collecting and processing data on natural persons for the purpose of compiling credit management reports, including reports on payment possibilities, underwriting, claim, collection and recovery information, in the context of credit granting and credit collection.	Pursuit of legitimate interests.
Further processing the personal data for the purpose of compiling (possible) future credit management reports, including reports on payment ability, underwriting, claim, collection and recovery information, and (possible) future claim and collection actions.	Pursuit of legitimate interests.
Assisting clients in making decisions regarding judicial and extrajudicial and foreclosure actions.	Pursuit of legitimate interests.
Preventing, detecting and tracking down fraud and fraudsters in order to recover any damages from the right person(s) on behalf of our clients.	Pursuit of legitimate interests.
Making your visit to the coeo websites as user-friendly and fast as possible by means of cookies.	Consent and/or pursuit of legitimate interests, depending on your cookie settings.
Keeping accounts and personnel records that comply with the respective tax and labour law obligations arising from laws and regulations.	Meeting legal obligations.
The (automated) production of personalised interactive video material to make our written correspondence more accessible to people with visual impairments or low literacy levels.	Pursuit of legitimate interests.
Providing customer service through the use of a chatbot approachable through our website, operated and supported by human staff and by large language models (LLMs).	Pursuit of legitimate interests.

5. To whom may coeo provide your personal data?

Coeo will provide your personal data to third parties to the extent necessary for providing our services, complying with obligations incumbent on us under the law or for the other purposes listed above. Limiting us to the purposes listed above ensures that personal data will only be provided to persons and bodies who are entitled to obtain or access such data on a lawful basis.

Coeo may also make your data available to third parties involved in processing and carrying out the objectives of coeo and its companies within the legal structure of which coeo is part. Coeo may also make your data available to third parties to support the preparation and/or settlement of decisions to be taken by third parties regarding the establishment, completion and termination of commercial and employment relationships. This data will only be provided to third parties that apply terms and conditions with at least an equivalent level of personal data protection as the terms and conditions of coeo and enter into a processing agreement with coeo.

Because we sometimes need to use the services of bailiffs for our purposes, bailiffs may obtain information about you in order to carry out their official duties - such as service of process and enforcement of court orders - as well as non-official duties - such as home visits. In addition, lawyers engaged by coeo may obtain information about you in order to create a file, provide legal advice or conduct legal proceedings on behalf of coeo or its clients.

If it appears that your details may be out of date, incorrect or incomplete, we may request trade information companies to complete your details so that we can get in touch with you about our clients' progress as soon as possible.

Provision to EDR

In the event coeo needs to provide advice to its clients in the context of your creditworthiness, coeo will be able to provide your data to **Economic Data Resources B.V.** (EDR) for verification thereof, for example for the purpose of initiating legal proceedings. EDR will provide coeo with an opinion on your creditworthiness based on this data.

EDR uses your data to research your creditworthiness and contact details. In addition, all your data relating to your payment behaviour are shared with EDR in the context of countering payment risks and preventing problematic debts. This therefore means that if, as a result of payment arrears, services are stopped, this information could potentially affect the conclusion of other agreements with (financial) obligations. If you wish to object or obtain information about EDR's use of your personal data, please refer to the following website:
www.edrcreditservices.nl/privacy-statement/.

Distribution abroad

As we are an international company and part of the European debt collection group "coeo Group", we may transfer your data to parties in a country other than the Netherlands or Belgium.

In general, your personal data will not be transferred to countries outside the European Economic Area (EEA) and your data will only be provided to countries where the AVG applies. If your case involves international debt collection, your personal data may be transferred to one of our debt collection partners or coeo Group members from the country where the claim arose or where you live. They may have access to your data and may also be located outside the EEA. We transfer your personal data to countries outside the EEA only when we can guarantee its security and protection. We therefore ensure that all recipients have signed the EU standard model clauses and that the necessary additional safeguards are implemented to justify the transfer, or that the country can guarantee adequate protection under data protection law.

6. How long does coeo keep your personal data?

Coeo does not retain personal data longer than necessary to fulfil our contractual obligations to our client, serve legitimate interests and comply with statutory retention periods. Where coeo retains your data for longer than strictly necessary for compliance with the contract or our legitimate interests - such as for fraud prevention or prevention of overcrediting - we will only do so for as long as legally required for the relevant purpose as shown in the overview above.

In principle, we keep your data in connection with already closed files for a period of five years, being the limitation period for monetary claims, including undue payments. In the event that your data relates to a judgment not yet fully executed, this may be up to 20 years, equivalent to the statute of limitations for judgments.

Coeo also retains your data within the framework of the legal fiscal retention obligation for a period of 7 years, but limits the retained data to only the data reasonably necessary to comply with this retention obligation. Coeo aims to anonymise your data as much as possible within the framework of this retention obligation.

In the case of coeo recording an incoming phone call, the call recording is kept for 30 days, the transcription of the call for 90 days and the analysis and metadata of the call for 365 days.

7. How does coeo protect your personal data?

Coeo takes appropriate technical and organisational measures to secure your (personal) data against loss or against any form of unlawful processing. Your data will therefore be protected and treated confidentially to the best of our ability at all times. For our digital processing, Coeo uses https connections, provided 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 strict access control. Digitally, the databases are password protected, the servers are also secured and only accessible with the provision of the correct credentials for the database. Customers only have the right to view the data relating to the orders of the respective customer. Employees can only view the data necessary for the correct performance of daily tasks.

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

The General Data Protection Regulation guarantees that - with regard to the processing of your personal data - you enjoy the following rights:

- **The right to data portability:** The right to get personal data in a transferable way us. Coeo aspires to inform you via PDF (Portable Document Format), a standard file format of Adobe Systems.

- **The right to erasure:** Also known as the right to 'be forgotten'. You have the right to request deletion of your personal data to the extent that it is no longer needed for the purpose for which it was collected.
- **Right of access:** You may request an overview of the personal data that coeo holds about 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 amend the personal data you process. You have the right to have erroneous and/or incomplete information about yourself corrected.
- **Right to restrict processing:** The right to have less data processed than is processed by coeo.
- **Right with regard to automated decision-making and profiling:** This includes the right to a human review of decisions concerning your personal data. If you believe that a decision taken as a result of an automated process may be different if handled manually, you can submit a request to coeo.
- **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 within four weeks of receipt whether the objection is justified. If the opposition is justified, coeo will immediately terminate the processing. In the event that we are unable to comply with your request, we will block the data to be retained for uses other than to fulfil the above (legal) obligations.

Note!

If you wish to exercise the privacy rights mentioned above, one of coeo's tasks is to first establish your identity. If that fails on the basis of the data already in our possession, coeo is entitled to ask you for proof - such as a copy of your passport or identity card - that enables coeo to establish your identity unambiguously.

If you provide us with an identity document, it is important that you do not give us too much information and shield sensitive data. Think of your photograph, your document number or your national register number.

Your identifier will not be kept longer than necessary to assess your claim, subject to your explicit consent to keep this document for a longer period for purposes specifically agreed with you.

9. Where to go for questions and reports?

For any questions regarding this Privacy Statement, please email privacy@coeo-incasso.nl, stating the subject **Personal Data Processing** and - if applicable - your **file number(s)**. Alternatively, you can send us a letter using the address details mentioned at the top of this statement, for the attention of the **Data Protection Officer** as mentioned at the bottom of this paragraph.

Coeo applies a period of four weeks to respond to your requests. Within four weeks, if, for example, a request for inspection is complied with, an overview, as complete as possible, of your personal data in the processing operations notified will be provided.

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

For complaints about how your personal data are processed, please contact privacy@coeo-incasso.nl. In that context, please provide us with sufficient references to handle 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 provided through our internal complaints procedure, you also have the option of submitting a complaint or a notification to the Belgian regulator, the [Data Protection Authority](#).

Our Data Protection Officer can be reached at the details given below:

Email addresses:

privacy@coeo-incasso.nl (Belgium) and fg@coeo-incasso.nl (Netherlands)

Postal address:

coeo B.V.
Attn: Data Protection Officer
Rooigemlaan 532
9000 Ghent
Belgium

10. When will 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 to regularly consult this Privacy Statement.