

Annex 1 - Overview of processed personal data (purpose, basis, category) (if necessary, data subjects are distinguished -CR - creditor/creditor's representative; D-debtor, O - other data subject). NB! From each indicated data category, personal data is processed in the necessary volume according to the processing operation (ie, not all personal data from the category is processed, if it is not necessary to perform the corresponding processing operation).			CR	D	C	T	B	D	C	I	Thi	R	O	P
PURPOSE	ACTIVITY	BASIS	General data	Debtors	Creditor's representative	Contractual processing operations	Debtors	Creditor's representative	Information	Information	Third party information	Records	Other information	Payment default information
Entering into and performing the contract:	Entering into the contract and pre-contractual activities (CR, O)	General Data Protection Regulation art 6 (1) b – contract (L) (customer who is a natural person); General Data Protection Regulation art 6 (1) f - legitimate interest (LI) (representative)	x		x	x	x							
	Identity and Authorization Verification (CR)	General Data Protection Regulation art 6 (1) b (customer who is a natural person); General Data Protection Regulation art 6 (1) f (representative)	x		x				x	x				

	Necessary analytics and development (e-collection and self-service)	General Data Protection Regulation art 6 (1) f (LI)	Generally anonymous, but depending on the development, all personal data may be processed							
	Transfer of data within the group and to other debt collectors	General Data Protection Regulation art 6 (1) f (LI)	Debt information, contacts, debtor information - the rest of the data will be transferred if necessary							
	Acquaintance and viewing of debt claims and transfer to default registers (+ publication, if appropriate)	General Data Protection Regulation art 6 (1) f (LI) + Section 10 of the Personal Data Protection Act		x				x		
Fulfillment of statutory obligations and proof and defense of claims	proving, defending claims, etc. (depending on the claim/procedure, all data may be processed), including recording and storage of communications	General Data Protection Regulation art 6 (1) f (LI)	All personal data can be processed							
	Accounting	General Data Protection Regulation art 6 (1) c - Statutory obligation (S)	x	x	x		x	x		
	Processing to fulfill other legal obligations (depending on the obligation, all data may be processed)	S	All personal data can be processed							
	Logging in	S and to the extent exceeding the obligation arising from the law LI (if any)	Logging of events in Julianus Inkasso's systems and software and communication tools (who, what, when, what did with the data)							
Development of services	Analytics online and in e-collection and self-service and service development based on this	LI	Generally anonymous, but depending on the development, all personal data may be processed.							
	Feedback and service development based on it	LI	Generally anonymous; but name, contact details and feedback may be processed							

Sales and marketing	Business client marketing through advertising and direct marketing	LI	x		x											x	
General business development	Strategic management and planning (including at group level)	LI	Generally anonymous; but depending on the situation, all personal data may be processed														
	Business transactions (including transformation of the company itself, sale, purchase of associations, etc.)	LI	All personal data can be processed														
Physical security	Surveillance cameras (+door cards)	LI														x	

Category of personal data	Data
CR general data	full name, strong authentication success information (if used), username (if used); contact details (email/telephone), correspondence/communication, position, authorizations, if a company, then company information, including representative details; confirmation of the correctness of the data
D general data	information may depend on the circumstances, generally: full name, strong authentication success information (if used), username (if used), social security code/date of birth, contact (address, phone number, email address), debt information; tax behavior information, property status information (real estate, holdings, etc.), payment failures
Contacts	Full name, email, phone
Technical specifications	Data generated when using e-collection and self-service and visiting the website - strong authentication information, service usage information and history, folder name (if any), logs (login and movement), date and time, computer operating system and browser used, country from which our website is accessed is visited, time zone, content of the request, access status code, volume of transmitted data, browser settings, browser software language and version, active browser plug-ins, IP address, other data collected through cookies
Communication	communication (email, calls, chat, etc.)
Billing information	Payment information, contract information related to payments, bank details

Debt information	Creditor, amount, underlying documents, payment information (e.g., partial payment information), type, circumstances (time of occurrence and other circumstances), related documents; other information provided by the parties, which may contain personal data (depending on the requirement - contract, correspondence, certificates, etc.)
Information from the registries	Money laundering register (generally name, contacts, address), other requests according to the circumstances: Publication Avalikud deadpanned (information about public announcements - date, type of announcement, preview of announcement), Transport Administration, Marital Property Register, Succession Register, Land Register (number of registered immovables), Commercial Register, Krediidiregister OÜ and Creditinfo Eesti AS, information from bailiffs; Tax and Customs Board (existence of tax debt, date, type of claim, timing, dispute); Riigi Teataja (number of court decisions). Julianus Inkasso processes the information listed in the registers/sources as needed.
Third-party information	persons related to the debt, e.g., guarantor or successor, information of the person who paid off the debt of another person, information of the representative, etc. - generally full name, social security number/date of birth, contact details, connection to the debtor/debt
Recordings	Communication recordings (emails, chat, calls, etc.), camera recording, door card logs
Other information	Feedback, cookie information, and other information provided (if any)
Payment defaults	availability of debt information, debt collector information, claim date/end date, claim information (main debt + secondary claims; state fee, representation fee (if any)); document proving the debt, field, status, dispute, contact details of the debtor (email/phone/address, index/residence), creditor's comment (if any)