

Data Protection Information

With the following information we would like to give you an overview of the processing of your personal data (hereinafter also referred to as "data") by us and your rights under data protection law. It contains cross-service and service-specific information. Which data is processed in detail and in what way it is used depends largely on the services requested, agreed or provided. Therefore, not all parts of this information will apply to you.

Under the designation LogPay (hereinafter "we" or "us" or "LogPay") are several business divisions combined.

In the business division Mobility Services are payment processing services provided to mobility service providers and their customers. In the business division Transport Services are services relating to tolls, refuelling, charging current, workshops, parking and e-commerce provided. In the business division Financial Services are services provided to rail-bound freight transport companies and their customers.

The contractual partner or customer must also pass on the information to the current and future authorised representatives, beneficial owners and any co-obligors arising from an obligation. These include, for example, managing directors, authorised signatories or co-debtors.

Person responsible for data processing

Responsible for data processing in the business unit Mobility Services and Financial Services is LogPay Financial Services GmbH. You can reach us at Schwalbacher Straße 72, 65760 Eschborn, Germany, e-mail for Mobility Services: mobility@logpay.de, for the other services info@logpay.de.

The LogPay companies work closely together in the business unit Transport Services. This also concerns the processing of your personal data. In the processing of personal data in the business unit Transport Services, LogPay Financial Services GmbH and LogPay Transport Services GmbH are jointly responsible for the protection of your personal data (Art. 26 GDPR). In the context of the joint responsibility for data protection, these companies of LogPay have agreed who fulfils which obligations under the GDPR. This concerns in particular the exercise of the rights of the data subjects and the fulfillment of the information obligations in accordance with Articles 13 and 14 GDPR. You can reach us at Schwalbacher Straße 72, 65760 Eschborn, e-mail: info@logpay.de or info@logpay-ts.de.

You can contact the data protection officer by mail at the above address with the addition - data protection officer - or by e-mail at datenschutz@logpay.de.

What sources and data does LogPay use?

We process your data that we receive from you, whether in the context of a business relationship or because you contact us or because a payment is to be processed with one of the payment methods of LogPay. In addition, we process data that is

legitimately transmitted to us by other companies (e.g. credit agencies, acceptance partners, mobility service providers and other service providers in the transport market, your employer, agent, insurer) or that we permissibly obtain from publicly accessible sources (e.g. trade, association and transparency registers, press, Internet).

Relevant personal data can be: personal details (e.g. name, address and other contact details, date and place of birth, nationality), legitimisation data (e.g. identification data), payment data (e.g. bank account details, credit card details), tax data (e.g. tax number), vehicle data (registration number, VIN). In addition, this can also include order data (e.g. payment order, order data), data from or in the context of the fulfillment of contractual obligations of LogPay (e.g. sales data, transaction data, fuel card number, mileage, limits, customer or identification numbers, customer designation), data on the use of services offered (such as login data, location data), information about your financial situation (e.g. e.g. creditworthiness data, scoring/rating data, origin of assets), advertising and sales data, documentation data (e.g. register data, data on the use of the telemedia offered by LogPay (e.g. time of access to websites, apps or newsletters, IP address)) and other data comparable to the categories mentioned.

Purpose and legal basis of the processing

The LogPay processes personal data:

On the basis of your consent (Art. 6 para. 1 lit. a GDPR)

If you have given LogPay permission to process data for specific purposes (e.g. evaluation of inventory and sales data for marketing purposes, receipt of newsletters, transfer of data to other companies), the legality of the processing is based on this consent. A granted consent can be revoked at any time. The revocation of consent does not affect the lawfulness of the data processed until revocation.

Establishment, implementation and termination of a contract (Art. 6 para. 1 lit. b GDPR)

The processing of data is carried out for the provision of payment services as well as services in the context of the implementation of contracts (such as the sale of mineral oil, use of loading infrastructure, toll services) or obligations (such as the processing of payments) of LogPay with you or for the implementation of pre-contractual measures, which are carried out at your request. The purposes of the processing are primarily based on the specific product (e.g. fuel card, toll card, charge card, e-commerce card, compensation procedure). Further details regarding the processing purposes can be found in the relevant contractual documents.

Due to legal requirements (Art. 6 para. 1 lit. c GDPR)

We process your data to fulfil legal obligations such as regulatory requirements, commercial and tax law storage obligations. In this case, the respective legal regulations in conjunction with Art. 6 para. 1 lit. c GDPR.

Legitimate interests (Art. 6 para 1 lit. f GDPR)

If necessary, we process your data beyond the actual fulfillment of the contract to protect the legitimate interests of LogPay or third parties. Examples:

- Creditworthiness/identity/risk check or assessment for risk avoidance, cost assurance, evaluation of the admissibility of certain payment types and avoidance of payment defaults
- Receivables management
- Data exchange with credit agencies to determine credit or default risks
- Assertion of legal claims and defence in legal disputes
- Ensuring network and information security and guaranteeing IT operations
- Detection, prevention and clarification of criminal offences, in particular we use data analyses to detect indications of card abuse or data misuse
- Commission for sales and distribution processing
- Further development of products and services
- Measures for sales and business management
- For the purpose of centralised processing for division of labour and increased efficiency
- Video surveillance for the protection of the householder's rights, for the collection of evidence in case of burglary
- Visitor management, fire protection and corporate security
- Testing and optimization of procedures for the analysis of requirements for the purpose of direct customer contact
- Overall view of the customer relationship with LogPay
- Advertising or market and opinion research, unless you have objected to the use of your data

We carry out a credit risk assessment based on mathematical-statistical procedures at credit agencies (scoring) and an identity check in the context of the establishment or continuation of a debt relationship, such as registration for payment methods that are risky for LogPay (such as SEPA direct debit) and/or in the event of changes to your data in connection with the change to payment methods that are risky for LogPay. Based on the information available to the credit agency, which also takes your address data into account, a statistical probability of a credit default and thus your solvency is calculated. In addition, a similarity calculation in percentage values can be used to determine whether the credit agency knows your person and address.

Categories of recipients of the data

Within the LogPay, those divisions get access to your data, which need it to fulfill contractual and legal obligations.

Data processing in the LogPay group

Specialized divisions in the LogPay Group perform certain processing tasks centrally for the companies affiliated in the group. If there is a contract between you and one or more companies of the LogPay group, your data may be processed centrally by a company of the LogPay group, for example for the central administration of address data, for telephone customer service, for contract and service

processing, for debt collection or for joint mail processing.

Agents

Insofar as you are being supported by an agent with regard to your contracts, your agent will process the application and contract data required for the conclusion and execution of the contract. LogPay also transmits this data to the agent who supports you, as far as he needs the information for your support.

External Service Provider

To fulfill its contractual and legal obligations, LogPay partially uses external service providers, which were carefully selected by us:

- Credit agencies to check your details and creditworthiness to avoid a default of payment
- Trade credit insurer to avoid payment default
- Collection agency for the purpose of collecting the claims and enforcing the claim in case you do not meet your payment obligations
- Payment service provider for the execution of payment transactions
- Payment system provider for the purpose of processing a payment
- Mailing service providers for the purpose of sending postal items and electronic communications to you (such as reminders, cards, invoices or notices)
- Telecommunications service provider
- Print service provider
- Mobility service provider for the purpose of conducting ticket sales or asserting claims of the mobility service provider against you
- Your employer for the purpose of managing company tickets
- IT service provider within the scope of an order processing
- Identification provider
- Lawyers for litigation
- Chartered accountant
- Billing service provider
- Translation service provider
- Marketing service provider
- Partners (e.g. toll collectors, mineral oil traders, electricity network operators, electricity filling stations, electricity loading service providers) to carry out a transaction.

If external service providers process your data on our behalf, they are based in the European Economic Area, have been commissioned in writing and are bound by our instructions. They are regularly checked by us. The service providers will not pass on your data to third parties, but will delete them after fulfilment of the contract and the conclusion of statutory storage periods, unless you have consented to storage beyond this.

LogPay Financial Services GmbH works together with the following credit agencies: (1) in Germany with SCHUFA Holding AG, Kormoranweg 5, 65201 Wiesbaden, and Creditreform Bielefeld Riegel & Unger KG, Sunderweg 3, D-33649 Bielefeld, (2) in Austria with Bisnode Austria GmbH, Geiselbergstraße 17-19, A-1110 Vienna.

The credit agencies process the data received and also use it for the purpose of profiling (scoring) in order to provide their contractual partners with information, among other things, to assess the creditworthiness of natural persons.

Further information on data processing by the following companies as credit agencies in accordance with Art. 14 GDPR, i.e. information on the business purpose, data storage purposes, data recipients, the right to self-disclosure, the right to deletion or correction etc., can be found on the Internet

- Information from Creditreform Bielefeld Riegel & Unger KG is available at <https://www.creditreform-bielefeld.de/EU-DSGVO/>
- Information from SCHUFA Holding AG is available at <https://www.schufa.de/de/datenschutz-dsgvo/>
- Information from Bisnode Austria GmbH is available at <https://www.bisnode.at/daten-und-sicherheit/nutzung-von-daten/>

The LogPay Financial Services GmbH transmits in accordance with Art. 6 para. 1 lit. f GDPR data on claims not settled despite the due date to SCHUFA Holding AG, if you have been reminded at least twice in writing after the due date of the claim, the first reminder was at least four weeks ago and you have not disputed the claim. This data can be taken into account there in the determination of probability values (scoring).

Other Recipients

In addition, LogPay may transfer your data to other recipients, such as authorities to comply with legal obligations, court or governmental orders (eg supervisory authorities, financial authorities, law enforcement agencies) or those entities for which you have given consent to transfer data.

Transfer to a third country or international organisation

Data is transferred to bodies in countries outside the European Union (so-called third countries) if

- it is necessary for the execution of your orders or the fulfilment of the contract
- it is required by law, or
- you have given your consent to LogPay.

Duration of Data Storage

LogPay processes your data as long as this is necessary to fulfill the above mentioned purposes. It may happen that personal data is kept for the time during which claims can be made against LogPay (legal limitation period of three or up to thirty years). We also store your data as far as we are legally obliged to do so. Corresponding proof and retention obligations arise from the Commercial Code, the Tax Code and the Money Laundering Act, among others. The storage periods are up to ten years.

Rights of affected Person

You have the right to request information from LogPay at any time about the data stored about you at LogPay (Art. 15 GDPR). In addition, you have the

right to demand correction under the conditions of Art. 16 GDPR and/or deletion under the conditions of Art. 17 GDPR and/or restriction of processing under the conditions of Art. 18 GDPR. Furthermore, under the conditions of Art. 20 GDPR, you can request data transfer at any time and/or, under the conditions of Art. 21 GDPR, you can object to the processing of your personal data at any time with effect for the future.

You can revoke your consent to the processing of data at any time to LogPay. The revocation, however, is generally only effective for the future. Processing that took place before the revocation is not affected.

Do you have an obligation to provide data?

As part of the business relationship with LogPay, you must provide the data that is necessary for the establishment, implementation and termination of a business relationship and the fulfillment of the associated contractual obligations or that LogPay is obliged to collect. Without this data, LogPay will generally not be able to conclude the contract with you, execute an order or perform an existing contract, so that it may have to terminate the contract.

Automated decision making

For the establishment and execution of the business relationship, LogPay generally does not use automated decision making in accordance with Art. 22 GDPR, with the exception of the business unit Mobility Services (see below). Should LogPay use these procedures in individual cases, it will inform you separately, if this is required by law.

The decision as to whether risky payment methods (e.g. SEPA direct debit) are possible for LogPay in the business unit Mobility Services is based on an automated decision, so that a manual check of your details by a LogPay employee does not take place separately. During the automated decision your given data will be compared with those of a credit agency and/or your score will be compared with a threshold value set by us. If certain data deviate from those of the credit agency, if no score value was transmitted to us or if your score value does not reach our limit value, certain payment methods are not possible for you. Information available from you about your previous payment history is also taken into account. LogPay uses the automated decision alone to protect itself from possible payment defaults.

With regard to the automated individual decision, you have the right, in accordance with Art. 22 para. 3 GDPR, to have a person intervene on the part of the person responsible, to present his or her own standpoint and to challenge the decision.

Profiling

LogPay processes your data partially automated with the aim of evaluating certain personal aspects (profiling). The LogPay uses profiling in the following cases, for example:

- Due to legal and regulatory requirements, LogPay is obliged to combat money laundering

and terrorist financing. In this context, data evaluations (e.g. in payment transactions) are also carried out.

- Within the scope of the assessment of your creditworthiness, we use information from credit agencies as well as experience from the previous business relationship or the previous debt relationship with you. In the case of corporate customers, additional data is also included, such as industry, annual results and financial situation.
- In order to be able to inform and advise you specifically about products, LogPay uses evaluation tools. These enable needs-based communication and advertising, including market and opinion research.

Right of Objection

Right of objection in individual cases

You have the right to object at any time, for reasons arising from your situation, to the processing of personal data relating to you which is carried out on the basis of Art. 6 para. 1 lit. e GDPR (data processing in the public interest) and Art. 6 para. 1 lit. f GDPR (data processing based on a balancing of interests); this also applies to profiling within the meaning of Art. 4 para. 4 GDPR based on this provision.

If you lodge an objection, we will no longer process your personal data unless we can demonstrate compelling reasons for processing that are worthy of protection and outweigh your interests, rights and freedoms, or unless the processing serves to assert, exercise or defend legal claims.

Right to object to the processing of data for direct marketing purposes

In individual cases we process your personal data in order to carry out direct advertising. You have the right to object, at any time, to the processing of personal data concerning you for the purpose of such direct marketing, including profiling, to the extent it is connected with such direct marketing.

If you object to processing for the purposes of direct marketing, we will no longer process your personal data for those purposes.

Right of complaint

You have the opportunity to complain to your local or in other way competent supervisory authority about data protection issues.

The competent supervisory authority for LogPay Financial Services GmbH and LogPay Transport Services GmbH is:

Der Hessische Beauftragte für Datenschutz und Informationsfreiheit, Gustav-Stresemann-Ring 1, 65189 Wiesbaden