

Important Information Regarding the Current noyb Campaign Concerning CRIF's B2C Score

Dear Sir or Madam,

based on our long-standing cooperation and mutual trust, we would like to provide you with an update following our communications in early June and late July regarding the public discussion about CRIF GmbH's B2C scoring procedure:

Our strong collaboration and mutual support are of utmost importance to us. Compliance with all legal regulations is a matter of course and forms the foundation of our work. We offer only services that fully meet data protection requirements. Accordingly, our scoring procedure has never been subject to complaints by the DSB or courts. As you know, the scientific analytical method we have used for years is an excellent way to minimize your default risk.

Information about noyb

As reported in the media, noyb has conducted a large-scale press campaign collecting powers of attorney and income information from nearly 2,500 Austrian private individuals. The NGO aims to gather the scores provided by CRIF to its contractual partners for these individuals via self-disclosure requests. The next step involves a scientific analysis of whether these scores correspond to the individuals' income situations.

- noyb's goal is to assess the validity of CRIF's scoring method. The self-disclosure requests submitted by noyb on behalf of participants under Article 15 GDPR were duly provided by us on August 26, 2025.
- With the launch of the noyb project in June, the NGO published Frequently Asked Questions on its website. Among other things, noyb states that it will submit further information requests on behalf of participants to examine the legality of data processing by CRIF and its partners.

Specific Note

noyb may also approach you with information requests under Article 15 GDPR. Contractual partners had to be listed as querying companies in the self-disclosures submitted to noyb.

Further information is available at:

 https://classaction.noyb.eu/de/info_pages/CRIF%20Scoring/faq – Question: What does noyb aim to find out with the information project (Step 1)?

Our Recommendations – With Our Support:

- **Transparency and Preparation:**

Should your company receive an information request – especially from noyb – we are of course available to support you both in terms of content and organization.

- **Review Your Information Obligations:**

Please ensure that your privacy notices comply with Article 14 GDPR. If not already done, we recommend integrating the wording proposal provided to you when our contract was concluded:

- “If it becomes necessary during our business relationship to verify your identity or creditworthiness, we will transmit the necessary data to CRIF GmbH, Rothschildplatz 3/Top 3.06.8, 1020 Vienna, which, as an independent controller, processes the transmitted data for its own purposes as a credit agency and address publisher, as described at <https://www.crif.at/datenschutz/>.”

- **Significant Use of the Score:**

As communicated in previous newsletters and supporting letters, it is crucial for your obligations toward affected individuals whether your company significantly uses a credit agency score or also applies other scores or decision-making logics, including manual intervention. If you have any questions, feel free to contact us.

Our Offer to You:

Supporting you and the Austrian market is a central concern for us. Should the noyb campaign yield new insights, we will – based on our scientifically grounded score – further improve it if necessary. As you know, our score, developed over decades, is highly effective in limiting your default risk and is based on demonstrably traceable scientific principles.

Although the current noyb campaign is focused solely on CRIF's B2C scores, it ultimately affects all B2C scores from credit agencies, as they are based on the same scientific analytical foundations.

We are happy to assist you in reviewing your data protection processes and are available for any questions or uncertainties. We can provide further information, statements, or offer a personal conversation. Please contact your responsible Sales or Client Success Team (clientsuccess.at@crif.com).

Kind regards,

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