

Information on joint controllership pursuant to Article 26 (2) 2 of the General Data Protection Regulation (GDPR)

Why do we use joint controllership?

ESPISAN, Agencia de Suscripción, S.L., Spain (“ESPISAN”) and Great Lakes Insurance SE, Königinstrasse 107, 80802 Munich, Germany (“GLISE”) work closely together in the provision of credit insurance services on the website www.trinios.es. This also applies to the processing of your personal data. The parties have jointly determined the purposes and means of processing of your personal data in each section of processing. Therefore, they are so-called joint controllers (Article 26 GDPR) for the protection of your personal data within the sections of processing described below.

In which sections of processing exists a joint controllership?

ESPISAN is an underwriting agency as well as the operator of a part of the website www.trinios.es where the service of credit insurance is offered to creditors (“Insurance Platform”). GLISE is a primary insurer and the risk carrier for credit insurance.

GLISE intends to include soletraders on the debtor side in order to be able to offer its clients insurance cover for an extended portfolio. The inclusion of soletraders as debtors for credit insurance on the Insurance Platform will lead to the processing of personal Data from these individuals as insured, such as names and contact data (“Personal Data”). The processing of Personal Data refers only to professional sphere of the individuals and not the domestic or private area. Hereby, the Personal Data will be collected by ESPISAN on its Insurance Platform under joint controllership and subsequently transferred to GLISE. The processing of such Personal Data will then be processed on the systems utilized by GLISE. GLISE will subsequently provide the premium calculation to ESPISAN which will then incorporate said premium on the Insurance Platform.

Furthermore, once the credit insurance contract has been concluded, ESPISAN will carry out receivables management for the clients on the insurance platform.

What did the Parties agree on?

ESPISAN and GLISE jointly agreed on which obligations each party fulfills under the GDPR. This particularly concerns the exercise of the rights of data subjects and the fulfilment of information obligations under Articles 13 and 14 of the GDPR.

This agreement is necessary because ESPISAN and GLISE both process personal data in different stages of the insurance of credit risks on the Insurance Platform. The operating rang of each party is defined as follows:

Description of processing	Fulfilment of obligation by:
Design the processing of credit insurance module on the Insurance Platform	ESPISAN
Collection of personal data on the Insurance Platform including personal data from public sources during the client onboarding process	ESPISAN
Pre-selection of invoices to be insured by GLISE	ESPISAN
Management of receivables on the Insurance Platform including management of insurance contracts	ESPISAN
Calculation of a premium to be offered to creditors for credit insurance	GLISE
Execution of insurance agreement	GLISE

What does this mean for you as the data subject?

Despite the existence of a joint controllership, the Parties fulfil the obligations under data protection law in accordance with their respective competences for the individual stages of the process as follows:

- Within the scope of joint controllership
 - ESPISAN is competent for the processing of personal data according to the above defined operating range and
 - GLISE is competent for the processing of personal data according to the above defined operating range.
- ESPISAN shall provide any information referred to in Articles 13 and 14 GDPR to the data subject free of charge in a concise, transparent, intelligible and easily accessible form, using clear and plain language. The same applies for the essential content of this Joint Controller Agreement in accordance with Art. 26 (2) GDPR. For this purpose, each Party shall provide the other Party with all necessary information relating to their respective operating range.
- The Parties shall immediately inform each other about the exercise of data subjects' rights and provide the other Party with all necessary information referred to the right in question.
- Pursuant to Article 26.3 GDPR, the data subject may exercise his or her rights under the GDPR against both ESPISAN and GLISE. In principle, the information to the data subject is provided by ESPISAN as single point of contact. Nevertheless, if the

data subject request is solely related to GLISEs operating range, GLISE will be responsible to provide the relevant answer to the data subject.

How can I get more information about data processing?

For more information about the processing of your personal data, please refer to our privacy policy, which is available at [.....].

Contact details of the Parties data protection officers are as follows:

- For ESPISAN: dpo@atlax360.com
- For GLISE: dataprotection@glise.com