

JUSTIFIED LEGITIMATE INTEREST ANALYSIS

15th, October 2025

Data Controller:	UAB TRAFIPARK, registry code 306362443, address Savanorių pr. 123A-3, 03150 Vilnius, Lithuania
The purpose of personal data processing:	The data will be used strictly for the purpose of vehicle identification, ownership verification, and legal claim processing (e.g., debt collection, contract enforcement, or damage liability review)
Categories of personal data / Types of personal data	Vehicle owner and user information, as well as vehicle make, model, first registration date, and Euro emission standard

A) Identification of Legitimate Interest

1. What is the purpose of the processing information?

The information is processed to identify vehicles, verify ownership, manage legal claims, and notify drivers or owners about traffic violations or outstanding fines. Accurate data ensures legal compliance and protects the company's rights.

2. Is the processing necessary to achieve one or more of the Company's objectives?

Yes. The processing of this information is necessary to achieve the Company's objectives, as it enables: (i) Accurate vehicle identification and ownership verification; (ii) Proper handling of legal claims, such as debt collection, contract enforcement, and damage liability assessment; (iii) Timely notification to drivers or owners regarding traffic violations, fines, or other legal obligations (iv) Ensuring compliance with legal requirements and protecting the Company.

3. Is the processing necessary to achieve one or more of a third party?

Processing is necessary for a third party is required to: (i) Provide a service – e.g., sending an invoice to a client using their data; (ii) Fulfill a contract – e.g., sharing delivery details with a shipping company to complete an order. (iii) Meet legal obligations – e.g., reporting certain information to tax authorities on behalf of a client.

4. Does the GDPR, the ePrivacy Regulation, or any other legal act identify the processing operation as a legitimate activity through a positive outcome of a balancing test?

Yes. Under the GDPR, processing can be considered legitimate if a balancing test demonstrates that the company's legitimate interests outweigh the potential impact on individuals' rights and freedoms. The processing must be necessary for the purpose and proportionate, ensuring that data subjects' fundamental rights are not overridden.

5. Is the legitimate interest behind the processing "legitimate"?

Yes, it is. The legitimate interest behind the processing is lawful, genuine, and clearly defined, such as improving services, ensuring security, or preventing fraud.

B) Necessity

6. Why is the processing operation necessary for the data controller?

The processing operation is necessary for the data controller because it enables the organization to fulfill its contractual, legal, or operational obligations: (i) to perform a contract, such as delivering goods or providing a service, the controller needs to process customer data (e.g., addresses, payment information); (ii) to comply with legal obligations, like reporting to tax authorities or maintaining records for regulatory purposes; (iii) To protect legitimate business interests, such as preventing fraud, ensuring IT security, or managing internal operations efficiently. In all cases, the processing is essential for the data controller to achieve these purposes, and no less intrusive method would suffice, making it necessary.

7. Why is the processing operation important for other parties to whom the data may be disclosed (if relevant)?

The processing operation is important for other parties to whom the data may be disclosed because it enables them to perform their roles or fulfill their obligations in relation to the data subject or the data controller: (i) Service providers or contractors may need the data to deliver a service, such as shipping companies needing customer addresses to complete deliveries; (ii) Regulatory or legal authorities may require the data to ensure compliance with laws or to protect public interests; (iii) Business partners may use the data to manage contracts, provide support, or coordinate operations efficiently. In these cases, the processing is essential for these third parties to carry out necessary activities, making it relevant and justified.

8. Is there another way to achieve the purpose?

No, there is no other way to achieve the purpose. The processing is necessary because it is the only effective and proportionate method to fulfill the intended goal.

C) Balancing test

8. Can the individual reasonably expect such processing?

Yes. The individual can reasonably expect such processing, as the collection and processing of personal data for debt recovery purposes are a common and foreseeable consequence of having an unpaid financial obligation or fine. This expectation arises from the individual's contractual or legal relationship with the original creditor and from standard industry practices. Furthermore, data subjects are typically informed of such processing through privacy notices issued by the creditor or the debt collection agency, ensuring transparency and compliance with data protection requirements.

9. Does the processing add value to the product or service used by the individual?

Indirectly, yes. While the primary purpose of the processing is to recover outstanding debts or fines, it also contributes to maintaining the integrity and fairness of the service provided. By ensuring that financial obligations are met, the company can continue to offer services on fair terms to all customers and prevent misuse or financial loss. Therefore, the processing indirectly supports the sustainability and reliability of the service.

10. Is the processing operation likely to negatively affect the individual's rights?

The processing may have a limited negative impact on the individual's rights, particularly regarding privacy and reputation, as it involves handling personal and financial information. However, these risks are minimized through strict compliance with data protection laws, proportional data use, and secure handling of personal data. The processing is limited to what is necessary for legitimate debt recovery purposes, and individuals are informed of their rights, including the right to access, rectify, or object to the processing.

11. Could the processing operation result in unwarranted harm or distress to the individual?

In general, the processing is not intended to cause harm or distress. However, there is a limited risk that individuals may experience discomfort or stress when being contacted regarding unpaid debts or fines. Such effects are considered proportionate to the legitimate purpose of debt recovery and are mitigated by ensuring that all communications are respectful, necessary, and compliant with legal and ethical standards. The company also limits data use to relevant information and provides clear contact options for individuals to exercise their data protection rights.

12. *Would not carrying out the processing operation result in harm to the data controller?*

Yes. If the processing were not carried out, the data controller would be unable to recover outstanding debts or fines, resulting in financial loss and reduced operational efficiency. This could also undermine the company's ability to meet contractual or legal obligations and affect its financial stability. Therefore, processing the data is necessary to protect the legitimate business interests of the data controller.

13. Would not carrying out the processing operation result in harm to a third party?

Potentially, yes. If the debt collection process is not carried out, third parties—such as the original creditor, suppliers, or other customers—could suffer financial or operational harm. For example, unpaid debts may affect the creditor's cash flow, ability to provide services, or fairness in treating other customers. Processing the data is therefore necessary to protect the legitimate interests of these third parties while remaining proportionate and compliant with data protection principles.

14. Is the processing operation carried out in the interest of the data subject?

Not directly. The primary purpose of the processing is to recover outstanding debts or fines, which serves the legitimate interests of the data controller and, in some cases, third parties. While the processing may indirectly benefit the data subject by maintaining fair and sustainable

services, the operation is not primarily carried out for the individual's personal interest. Safeguards and transparency measures are implemented to minimize any negative impact on the data subject.

15. Is the legitimate interest of the data subject balanced with the legitimate interest of the party relying on the legitimate interest exemption?

Yes. The processing is conducted in a manner that balances the legitimate interests of the data controller (recovering debts or fines) with the rights and interests of the data subject. The company limits data collection and use to what is strictly necessary, ensures secure handling of personal data, and provides clear information and rights to the individual. Measures such as proportionality, transparency, and access to remedies are applied to ensure that the individual's interests are not overridden by the controller's legitimate interest.

16. What is the relationship between the individual and the company?

The relationship is primarily a financial or contractual one. The individual owes a debt or has an outstanding fine to the company's client, establishing a creditor-debtor relationship. The company processes personal data in this context to recover amounts lawfully due, in line with its legitimate interests and obligations under applicable law. There is no ongoing service provision beyond managing the financial obligation unless otherwise specified by a separate contract.

17. What is the nature of the data being processed? Does it include special category data?

The data being processed is primarily personal and financial in nature, including the individual's name, contact details, payment history, and information related to outstanding debts or fines. It does not typically include special category data as defined under GDPR (e.g., health data, racial or ethnic origin, political opinions, religious beliefs, or biometric data). The processing is strictly limited to what is necessary for debt recovery and conducted in accordance with data protection principles.

18. Does a bilateral relationship exist between the company and the individual whose data is being processed? If yes, how close is the relationship?

Yes, a bilateral relationship exists, but it is limited in scope. The relationship is primarily financial or contractual: the individual owes a debt or has an outstanding fine to the company (or its client). The closeness of the relationship is minimal and transactional, focused solely on the management and recovery of financial obligations. There is no ongoing personal or service-based relationship beyond the debt or fine context.

19. Does the processing restrict or infringe upon the individual's rights?

No, the processing is designed to comply with data protection laws and does not unduly restrict or infringe upon the individual's rights. Individuals retain their rights to access, rectify, object to, or erase their data, and the company provides clear information on how these rights can be exercised. Any impact on the individual is proportionate and limited to what is necessary for the legitimate purpose of debt recovery.

20. Were the personal data obtained directly from the individual or indirectly?

The personal data may be obtained directly. Directly, the company may receive information provided by the individual during initial transactions, registration, or communication with the creditor. All data is processed in accordance with data protection principles.

21. Is there a relationship of subordination or power between the individual and the company?

No, there is no formal relationship of subordination. The relationship is primarily financial or contractual: the individual owes a debt or has an outstanding fine to the company (or its client). While the company does have authority to pursue debt recovery, this authority is limited to the legal and contractual obligations associated with the debt. There is no ongoing hierarchical or employment-like power over the individual beyond what is necessary to enforce legitimate financial obligations.

22. Is it likely that the individual would expect their data to be processed for this purpose?

Yes. Given the individual's financial or contractual relationship with the company (or its client), it is reasonable for the individual to expect that their personal data would be used to manage and recover outstanding debts or fines. Such processing is standard practice in debt collection and is typically communicated to the individual through privacy notices or contractual terms, making the purpose foreseeable and aligned with the individual's expectations.

23. Can the processing be considered intrusive or inappropriate? Would it be seen as such by the individual or based on the context of the relationship?

Generally, the processing is not considered intrusive or inappropriate. The company processes personal data solely for the legitimate purpose of recovering debts or fines, within legal and contractual boundaries. While some individuals may feel discomfort when contacted about outstanding obligations, this is proportionate and expected within the context of a creditor-debtor relationship. Safeguards such as limited data use, respectful communication, and transparency ensure the processing remains appropriate and lawful.

24. Have privacy terms been disclosed to the individual? How?

Yes. Privacy terms are typically disclosed to the individual through multiple channels, such as: (i) Privacy notices provided by the original creditor at the time of entering into a contract or financial agreement; (ii) Written communications or emails from the company explaining how personal data will be used for debt recovery purposes; (iii) Publication on the company's website or in official contractual documentation. These disclosures ensure transparency and compliance with data protection laws, allowing the individual to understand how their personal data will be processed and to exercise their rights.

25. Can the individual whose data is being processed easily control or object to the processing operation?

Yes. Individuals can exercise their rights under data protection law to control or object to the processing of their personal data. The company provides clear information on how to submit requests, including the right to access, rectify, restrict, or erase data, and the right to object to debt recovery communications where applicable. These mechanisms ensure that the individual retains control over their personal data while allowing the company to carry out its legitimate debt recovery activities in compliance with legal requirements.

26. Can the scope of processing be adjusted to reduce significant privacy risks?

Yes. The company can limit the scope of processing to what is strictly necessary for debt recovery, thereby reducing potential privacy risks. Measures include processing only relevant personal and financial data, limiting access to authorized personnel, anonymizing or pseudonymizing data where possible, and restricting communications to essential channels. These adjustments help ensure proportionality and minimize the impact on the individual's privacy while still allowing the company to pursue legitimate debt recovery activities.

D) Safeguards and Compensating Controls

The company implements multiple safeguards and compensating controls to protect individuals and reduce the risks or potential negative effects of processing personal data. These measures include: (i) Data minimisation: Only collecting and processing data strictly necessary for debt recovery; (ii) De-identification or pseudonymisation: Reducing the link between personal data and the individual wherever possible; (iii) Technical and organisational measures: Ensuring secure storage, access controls, and staff training; (iv) Privacy by default: Configuring systems to process the minimum personal data needed for the purpose; (v) Transparency measures: Clear communication to data subjects about the purpose and scope of processing; (vi) Encryption and multi-factor authentication: Protecting data from unauthorised access; (vii) Data retention controls: Retaining data only for as long as necessary to fulfill debt recovery purposes. (viii) Restricted access: Limiting access to authorised personnel; (ix) These safeguards collectively ensure that the processing is proportionate, secure, and compliant with applicable data protection legislation, while mitigating potential negative impacts on the individual.

E) Conclusions

After assessing the legitimate interest balancing test, it can be concluded that the processing of personal data by the company for the purpose of debt and fine recovery is lawful, proportionate, and conducted in accordance with data protection principles. The processing serves a legitimate interest of the company, and any potential impact on the rights and freedoms of the data subject is mitigated by: (i) limiting data processing to what is necessary; (ii) implementing technical and organizational safeguards; (iii) ensuring transparency through clear privacy notices; (iv) providing mechanisms for individuals to exercise their rights; (v) applying measures to minimize potential distress or harm.

Overall, the legitimate interest of the company is balanced against the rights and interests of the individual, and the safeguards in place ensure that the processing is fair, secure, and proportionate.

Conducted by:

(name, surname, job title, signature)