



PRIVACY POLICY OF BISNODE D&B SWITZERLAND LTD.

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Introduction

Bisnode D&B Switzerland Ltd. is a part of the Bisnode Group. In this Privacy Policy we inform you of the type, scope and purpose of the collection and use of your personal data by Bisnode D&B Switzerland Ltd. and the companies affiliated with the Bisnode Group. In addition, the respective current versions of the General Terms and Conditions of Bisnode D&B Switzerland Ltd. and the Online Privacy Statement apply.

Which personal data about you as a consumer, sole proprietor and/or decision-maker of a company do we process?

We process information about you as a consumer, sole proprietor and/or decision-maker of a company. This includes master data such as name, address, telephone number and e-mail. In addition, we collect credit card information about you, in particular payment experiences, debt and insolvency information. In some cases, as a result of largely automated processes to analyse databases, profiles are created using various analysis techniques. In the process, existing databases are extended with statistical probability variables. For sole proprietorships, we also store company and financial data.

We do not process any sensitive personal data (Art. 3, letter c of the Federal Act on Data Protection - FADP) and we do not create any personality profiles (Art. 3, letter d of the FADP).

We generally use master data for marketing purposes. We have marketing information on both private individuals and people in their professional role, such as decision-makers.

For a complete list of the collected data, please visit our website at www.bisnode.ch. Should you be interested in further information on the personal data we collect and process, please contact our customer service at info.ch@bisnode.com.

Where does the data originate from?

Bisnode is active in 18 countries in Europe. Data is always procured locally in the respective country. Most data held by Bisnode originates from:

- Public registers, in particular the commercial register, the register of residents and the debt collection register
- Telecommunication providers
- Other data brokers
- Partnerships with some of our customers with respect to invoice information, which is used to determine payment patterns that are used for credit purposes
- Business-related information, which is used in our D&B offers from countries where Bisnode is not active, originates from our partner Dun & Bradstreet (www.dnb.com) and its global network of partners

For details on the data we collect in Switzerland, please visit www.bisnode.ch.

How do we process your personal data?

Bisnode processes personal data about you as a consumer, sole proprietor and/or decision-maker of a company for various purposes. Below you will find a brief overview of the purposes of our data processing within the Bisnode Group.

Purpose	Definition
Credit	Credit comprises data that is processed for the purpose of assessing customer credit ratings. This includes the credit status and the payment default risk of market actors.
Directory	Directory describes a type of catalogue that contains master data such as telephone numbers and address data, which we use for reference purposes.
Marketing	Marketing means that data is used for advertising efforts for existing customers, potential prospective clients and other target groups. This applies, for example, to the sale of address data to Bisnode customers, who in turn conduct marketing, targeting their own customers. In doing so, Bisnode uses both internal and external Robinson lists to ensure that none of the individuals listed on these registers receive any unsolicited marketing material by marking them accordingly. A Robinson list is an opt-out list of people who do not wish to receive marketing information.
Verification and monitoring (data quality and data management)	This service comprises updates, amendments and verifications of personal information, which is also referred to as data management and data quality. In this case, Bisnode customers usually want to update their existing client base with accurate information.
Contractual obligations	If you are a customer of Bisnode, we have to process certain information to enable us to meet our contractual obligations.

Who do we share your data with?

Our business consists in helping our customers to obtain the best possible data about their clients as well as helping them to make well-founded business decisions based on accurate data. Against proof of interest provided by our customers, we share the above-mentioned personal data about you as a consumer, sole proprietor and/or decision-maker of a company with our customers. Our customers work in the following sectors:

- Manufacturing
- Electricity industry (electricity, gas, water, steam and air-conditioning systems)
- Construction sector
- Wholesale and retail trade
- Information and communication sector

- Financial and insurance sector
- Real estate industry
- Science and research
- Administrative and supporting services
- Public administration
- Education
- Human health and social work sector
- Agriculture
- Catering

Our legal basis for collecting and storing your data as a consumer, sole proprietor and/decision-maker of a company

Overriding interest in checking credit rating

Credit information plays an important part within society. It enables companies to check the solvency of customers, for instance when the latter order goods online or wish to take out a mortgage with a bank. Today, the calculation and provision of credit information, as well as receipt and the use of such credit information by the customer, is almost taken for granted. This applies particularly when entering into agreements via the Internet (online shopping).

Bisnode keeps complete credit data registers in order to provide our customers with services to check the credit status of individuals or companies, so as to help them manage their financial risks. This is intended, for example, to prevent that credits are granted to insolvent individuals or companies.

With this service we also facilitate the following general social interests:

- Keeping down the debt of consumers – preventing over indebtedness.
- Credit information is a key factor for the economy as a whole.
- It is important for the economy that creditors can protect themselves against credit losses and for the credit applicants to obtain the requested credit.
- It is important that the credit market and e-commerce is not restricted just because of the difficulties in assessing credit risks.

High-risk data

With respect to compiling large datasets on data subjects, Bisnode regards credit data as “high-risk data” (current debt and debt history). The credit information database comprises many data subjects. Bisnode calculates so-called credit scores for credit information purposes. However, it must be mentioned that Bisnode itself never makes any decisions on whether a data subject is to obtain credit or not, neither manually nor electronically. This is always done by the party purchasing the information from us.

Impact on the individual

Most people are not granted credit if their solvency cannot be checked in advance. For this reason, it is in the interest of the individual that credit information companies are on hand. However, a negative credit score can have a negative impact on a person if the calculation is not based on accurate information.

Generally, data with a higher average risk is stored in order to perform the credit score calculations and to show the general financial status of an individual (however, this data is not sensitive). If, for whatever reason, we lose this data (data breach), this may constitute a major infringement of the privacy of an individual, even if in many cases the information stems from public sources.

Furthermore, it is not to be expected that individuals understand the logic behind the evaluation or, for example, fraud detection that is based on a pattern instead of facts. If such models are based on inaccurate data, as already mentioned this may result in denial of credit and thus make it impossible for the person concerned to make a purchase on credit.

In the interest of the individual it is important to maintain a limited number of databases with credit data, instead of burdening every company with its own credit database and having to request data separately from authorities and other data sources when credit information is required.

Proportionality

It seems likely that there are risks of infringement of the privacy of individuals. However, in today's society, credit verification plays an important part. At the core of and in keeping with the Consumer Credit Directive, all credit institutions or companies that grant credit of any kind must ensure that credit is only given to persons who are able to repay it.

This data is protected and is only used for the stated purpose. Furthermore, it is in the interest of most data subjects to be granted credit or a loan at some stage in their lives.

Therefore, Bisnode believes that the processing of credit information as stated above is proportionate.

Legitimate interest in direct marketing and data management

"Every company has a legitimate interest to process personal data for direct marketing purposes." For most companies direct marketing is essential for providing information on their products.

The services of Bisnode in the direct marketing and data management segment are intended to ensure that our customers have up-to-date data and enough information to make their clients appropriate offers.

Impact on the data subject – to what extent can data processing affect privacy?

Provided that the data is protected, maintaining databases about data subjects with respect to direct marketing does not automatically affect the privacy of a person. Storage of data about a large number of individuals, however, may pose a security risk if information is lost.

Impact in the event of data loss

The data that is used for direct marketing is usually of a fundamental nature and is not high-risk. However, if further information is added as traditional contact details, such as lifestyle variables based on statistics, a clearer profile of the person is established. The more information is collected or created, the clearer the profile and thus also the risk and impact in the event of data loss. However, Bisnode does not store any sensitive data.

Expectations of individuals with respect to direct marketing

In most countries individuals expect to be targeted by marketing campaigns. They assume that companies, from which they have purchased something in the past, will contact them again and try to sell them something, unless they have, for example, unsubscribed from a newsletter. To a certain degree, data subjects expect direct marketing even from companies with which they are not in contact. However, it is not to be expected that the average person knows that information providers have large registers containing personal information, which is sold for direct marketing purposes.

Impact on the individual

With respect to processing master data for direct marketing, Bisnode believes that the probability that this processing could result in a high risk to the privacy of the individual is low. However, there is always a risk that certain persons do not want their information to be distributed unduly that they take respective action against this.

In the event of a master data leak, there is only a low risk of damage as this data is generally publicly available. Other data, such as sex and date of birth, which is used for marketing purposes, can increase the risk. Yet, it is still unlikely that it causes damage to individuals if lost.

Proportionality

In many respects the processing of personal data by Bisnode is a necessity for our customers in order to find the right people and send the right message via the respective channels. Bisnode attaches great importance on compliance with the industry standards and code of conduct for the processing of personal data. Bisnode has implemented a range of measures to deal with the rights of individuals in order to protect the privacy of the latter. The objections to be expected as well as the risks to individuals are reduced by these measures. With this kind of action, we do not anticipate any serious impact on the privacy of individuals. The consequence of inaccurate information would be that this person does not receive any direct marketing offers or that the person receives a message of an offer that is not relevant to them.

The main risk of processing personal data for direct marketing lies in the number of data subjects who are processed by Bisnode and in the potential loss of this information. The processing is protected by means of technical and organisational measures implemented by Bisnode. In addition, we classify all of our data in accordance with the CIA method. CIA stands for confidentiality, integrity and availability and is used to determine which security measures must be in place when using a particular kind of data.

Bisnode believes that there is a legitimate interest in the processing of personal data for direct marketing purposes.

Which information about our customers do we process?

For bidding, contract formation and contract fulfilment

We collect information about our customers in order to place a bid, or to form or fulfil a contract. This includes in particular the following information: Name, company, title, address, country of residence, e-mail address, telephone number as well as data on your credit rating, financial situation and business you transact with us or any third party providing services to us.

In particular, we may ask you to disclose this data to us when you register in order to access password-protected or country-specific parts of our website. We use this information in order to check your identity and suitability for specific products and services, to send you information on products and services that we believe may be of interest to you, to record your interest in the products and services we offer and to comply with your request for information.

If the business relationship with you no longer exists, your personal data will be deleted, provided there are no legal obligations to preserve these records.

For marketing purposes

We process information about our customers that is disclosed to us verbally, in writing or electronically, as well as publicly available data and data we obtain from third parties, including for marketing purposes. This serves the purpose of providing you with individual advice and sending you individual offers for products and services, as well as improving our services. Furthermore, we use this information to send out our newsletter, provided the customer is subscribed to it.

For these marketing purposes we process the following categories of personal data: identification and contact details of the contact persons, contract data, interaction data and data on the customer requirements.

General terms

How we protect your data

Bisnode implements appropriate technical and organisational measures to protect all personal data against unauthorised access, amendment or erasure. To this end, Bisnode complies with all relevant industry standards and any codes of conduct.

Sharing data and transmission of data to foreign countries

In some cases Bisnode uses so-called processors for processing data. Typical examples of this are our server providers, who maintain our server environment, or an external consultancy, which helps us develop our solutions.

Bisnode carefully selects its processors and enters into data processing agreements to ensure that the data is processed in accordance with our standards, i.e. data protection-compliant. Furthermore, we check our suppliers with respect to their level of security and state of technology to ensure that they meet our standards.

Bisnode is responsible for all processing of our data by processors as the latter work on our behalf. We take great care to ensure that all of our data is processed within the EU. In the few cases, where processing takes place outside of the EU, we ensure the protection of your personal data by means of appropriate safeguards. This includes carefully checking the processor and ensuring that all necessary security measures are in place and the relevant conditions of contract are included in our agreements.

Rights of data subjects

Right to access

Bisnode offers you access to the personal data we process about you. This means that you can contact us and we will in turn inform you which personal data about you we have collected and processed and for which purposes this data is used.

Right to rectification

You have the right to contact us in order to correct or complete any inaccurate, incomplete, out-of-date or unnecessary personal data we have stored about you. In some cases, where we use official data, we may ask you to contact the respective authorities directly to make these corrections. This is to ensure that the corrections required for such registers are made via the official channel.

Right to erasure

We store your data in our system in accordance with our retention guidelines. How long we keep the data depends on the legal requirements and the terms and conditions that are defined for each dataset. If the data is no longer required, it is deleted from our systems.

You can also ask us to delete your personal data from our systems. We will comply with this request, unless we can assert a legitimate interest in the retention of this data or we have to store the data for legal reasons.

Right to blocking

You can block the use of personal data if this data is used for other purposes than for providing our services or fulfilling a legal obligation. You can also block any further processing of personal data, having previously given your consent. If you block any further processing of personal data, the use of our services may be limited as a result.

Furthermore, you have the right to refuse the use of your personal data for direct marketing purposes and market research. However, should your data be required for other purposes, such as fulfilment of an existing agreement or legal obligation, it shall remain in our database and will be used for the fulfilment of these purposes.

Right to restriction of processing

You can ask us to restrict the processing of certain personal data; however, this may restrict the use of our website and services as a result.

How to exercise your rights

You can exercise the abovementioned rights by sending us a letter or e-mail to the address stated below; please include the following information: Name, address, telephone number and a copy of a valid form of ID. We may request that you provide additional information required to verify your identity. We may reject unreasonably repetitive, excessive or clearly unfounded requests.

You have the right to request a copy of the information we have about you. If you require a copy of some or all of your personal information, please send us an e-mail or letter to the address stated below.

E-mail: info.ch@bisnode.com

Address: Bisnode D&B Switzerland Ltd
Postfach, Grossmattstrasse 9, 8902 Urdorf

Right to lodge a complaint with the data protection authority

You have the right to lodge a complaint with the data protection authority if you are not satisfied with the way your data is handled. Please find below the contact details of the Swiss Data Protection Authority:
<https://www.edoeb.admin.ch/edoeb/de/home.html>.



Changes to our Privacy Policy

We will regularly review and update our Privacy Policy. This Privacy Policy was last updated on 28 March 2018.

How to reach us

Please contact us if you have any questions regarding our data protection information or the information we store about you.

Telephone: +41 (0)44 735 64 64

E-mail: info.ch@bisnode.com

Address: Bisnode D&B Sitzerland Ltd
Postfach, Grossmattstrasse 9, 8902 Urdorf

If you wish to contact our data protection officer, please e-mail dpo.ch@bisnode.com.