

# KBDM PRIVACY POLICY

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# 1 General information

## 1.1 What is this privacy policy about?

It is possible that we process your personal data (you can find out exactly who "we" are below). This may be the case, for example, if:

- you purchase products or services from us, e.g. via our online store or via our employees.
- you offer or sell us your own products or services
- you are interested in our products or services and therefore contact us
- we obtain data about you because we want to acquire you, your company or your employer as a customer
- you visit one of our websites to find out about us, our products and our services
- you subscribe to one of our newsletters so that you can keep up to date
- you find out about us or connect with us on a social media platform
- you apply for an open position with us and send us personal information such as a CV
- we obtain data about you in order to integrate this data into our marketing databases and make it available to our customers
- ...

In the following, we refer to "applications" when we refer to this (non-exhaustive) list of possible points of contact and the associated data procurement and processing.

With this privacy policy, we would like to inform you about what we do with your data in the various applications and what data this may be. Or to put it in data protection jargon: we provide transparency about our data processing, the purposes we pursue with it and other important points that are necessary so that you can exercise your corresponding rights.

As you can see from the list of applications above, there are many different options for obtaining and processing data. Depending on which of the applications apply to you, different information will be relevant to you. To make things a little clearer for you, we have divided our privacy policy into the following aspects or "applications":

- **General information**
  - This is information that applies to all applications, such as the question "Who is responsible for data processing?"
  - However, summarizing, overarching information is also conveyed here, which can then be concretized in the individual applications and made more tangible with examples
  - For example, all possible categories of data recipients are named under the general information (e.g. IT service providers) and, depending on requirements, we then go into more detail below in the respective applications about individual categories or even individual recipients
- **Additional information for (potential) contractual partners**
  - This information may relate to you if we have a direct business relationship with you or if we (or you) wish to establish such a relationship
  - On the one hand, this may be when we (would like to) offer or sell you our products or services, i.e. when we can count you among our customers or interested parties
  - But this can also go the other way, i.e. if you offer or sell us your products or services
  - Basic information can be found in the "General information", here in the "Information for (potential) contractual partners" this information is specified or expanded with regard to the corresponding contract applications
- **Additional information for newsletter subscribers**
  - This information may be relevant to you if you have subscribed or would like to subscribe to one of our newsletters

- Here you can find out how we process your data as part of a newsletter subscription and what you can do if you do not want this (any more)
- Basic information can be found under "General information", here under "Information for newsletter subscribers" this information is specified or expanded in relation to the corresponding newsletter applications
- **Additional information for website visitors (incl. social media)**
  - This aspect may be of interest to you if you wish to visit one of our websites
  - However, it may also affect you if you wish to find out more about us or connect with us on a social media platform
  - Here you can find out what data we collect and how we process it
  - Basic information can be found in the "General information", here in the "Information for website visitors (incl. social media)" this information is specified or expanded in relation to the corresponding web or social media applications
- **Additional information for applicants**
  - You may be interested in this aspect if you would like to apply for a job with us and send us information about yourself (e.g. your CV)
  - Here you can find out how we can process your information and data as part of an application
  - Basic information can be found in the "General information", here in the "Information for applicants" this information is specified or expanded in relation to the corresponding application applications
- **Additional information for interested parties**
  - This aspect may be relevant to you if your data is recorded in one of our marketing databases and is therefore processed by us or our customers
  - This may be the case, for example, if we have taken your data from a publicly accessible directory (such as the telephone directory) and stored it in one of our databases
  - Here you can find out which data, sources and processing are affected and what this could mean for you
  - Basic information can be found in the "General information", here in the "Information for applicants" this information is specified or expanded in relation to the corresponding marketing applications

This privacy policy is designed to meet the requirements of the Swiss Data Protection Act ("DSG"), the new revised Swiss Data Protection Act ("nDSG") and the EU General Data Protection Regulation ("GDPR"). Whether and to what extent these laws are applicable, however, always depends on the specific individual case.

## 1.2 Who is responsible for processing your data?

KünzlerBachmann Directmarketing AG ("KBDM", "we", "us") is responsible under data protection law for the data processing referred to in this privacy policy, unless otherwise communicated in individual cases. If you have any questions, or if you would like to exercise your data protection rights (in particular the right to information), you can contact us at this address:

**KünzlerBachmann Directmarketing AG**  
Zürcherstrasse 601  
CH-9015 St. Gallen  
[datenschutz@kbdirect.ch](mailto:datenschutz@kbdirect.ch)  
+41 71 314 04 04

However, you can also contact these offices for your data protection concerns:

Data protection advisor pursuant to Art. 10 nDSG and data protection officer pursuant to Art. 37 ff. GDPR :

**rogermuffler gmbh**  
Roger Muffler  
Kreuzlingerstrasse 158  
CH-8587 Oberaach  
[datenschutz@rogermuffler.gmbh](mailto:datenschutz@rogermuffler.gmbh)

Data protection representative in the EU pursuant to Art. 27 GDPR:

**Mailprofiler Development s.r.o.**  
Reznicka 1332/7  
460 01 Liberec  
Czech Republic  
[gdpr.officer@mailprofiler.com](mailto:gdpr.officer@mailprofiler.com)

## 1.3 What data do we process from you?

We may process different categories of data about you, including current and, where applicable, previous information, if individual details change (e.g. in the event of a change of address). The most important categories are as follows:

**Technical data:** When you use our website or other electronic offers, we may collect the IP address of your end device and other technical data. In order to ensure the functionality of these offers and possibly also to record your behavior, we can also assign an individual code to you or your end device (e.g. in the form of a cookie, cf. 4.2.4). In the context of user accounts, registrations, the processing of contracts or the provision of our products and services, technical data may be linked with other categories of data (and thus possibly with your person).

**Registration data:** Certain offers and services can only be used with a user account or registration. In doing so, you must provide us with certain data and we collect data on the use of the offer or service.

**Communication data:** If you are in contact with us via the contact form, by e-mail, telephone or chat, by letter or by other means of communication, we collect the data exchanged between you and us, including your contact details and the marginal data of the communication. If we want or need to establish your identity (e.g. in the case of a request for information), we collect data to identify you (e.g. a copy of an identity document).

**Master data:** We define master data as basic data such as name, address, contact details and other information, e.g. about your role and function, date of birth, customer history, signature authorizations and declarations of consent. However, this may also include other socio-demographic information, such as purchasing power class. We receive master

data from you yourself (e.g. as part of a registration or an order), from bodies for which you work, from third parties (e.g. mailing lists or credit agencies), from other third-party sources such as public registers or the internet (websites, social media, etc.) or we calculate it (such as purchasing power class).

**Contract data:** This is data that arises in connection with the conclusion or execution of a contract (e.g. information about the parties or the services to be provided). This may also include data from the run-up to the conclusion of a contract that is necessary for the initiation and execution. Application documents may also fall into this category. As a rule, we collect contract data from you, from contractual partners and from third parties involved in the execution of the contract, but also from third-party sources (e.g. providers of creditworthiness data) and from publicly accessible sources.

**Behavioral and preference data:** Depending on the relationship we have with you, we try to get to know you better. To do this, we collect, analyze and use data about your behavior and preferences. We do this, for example, by evaluating information about your browsing behavior on our website or by combining various data using statistical methods (machine learning) in order to derive your interests and preferences.

**Other data:** We also collect data from you in other situations. In connection with official or legal proceedings, for example, data is collected (such as files, evidence, etc.) that may also relate to you. We may receive or produce photos, videos and audio recordings in which you may be recognizable (e.g. at events, through security cameras, etc.). We may also collect data about who enters certain buildings or has access rights to them and when (including during access controls, based on registration data or visitor lists, etc.), who takes part in events or campaigns (e.g. competitions) and when, or who uses our infrastructure and systems and when.

Many of the items listed in this sec. 1.3 you disclose to us yourself (e.g. via forms, as part of communication with us, in connection with contracts and orders, when using the website, etc.). You are often not obliged to do so, with the exception of individual cases, e.g. in the context of legal obligations. However, if you wish to conclude contracts with us or make use of services, you must provide us with data as part of your contractual obligation in accordance with the relevant contract, in particular master data, contract data and registration data. When using our website, the processing of technical data is unavoidable. If you wish to gain access to certain systems or buildings, you must provide us with registration data.

Insofar as this is not prohibited, we also obtain data from publicly accessible sources (e.g. telephone directory, debt collection register, land registers, commercial register, media or the Internet, including social media) or receive data from authorities, companies or other third parties.

Further information on the data processed can be found in the additional information on the individual applications under "What data do we process about you and for how long" (click on the relevant application to go directly to it):

- Additional information for (potential) contractual partners
- Additional information for newsletter subscribers
- Additional information for website visitors (incl. social media)
- Additional information for applicants
- Additional information for interested parties

## 1.4 How long do we process your data?

We process your data for as long as required by our processing purposes, the statutory retention periods and our legitimate interests in processing (including for documentation and evidence purposes) or for as long as storage is technically necessary. Further information on the respective storage and processing periods can be found in the individual applications or the associated data categories. If there are no legal or contractual obligations to the contrary, we will delete or anonymize your data after the storage or processing period has expired as part of our normal processes.

Further information on the duration of data processing can be found in the additional information on the individual applications under "What data do we process from you and for how long?" (click to go directly to the relevant applications):

- Additional information for (potential) contractual partners
- Additional information for newsletter subscribers
- Additional information for website visitors (incl. social media)
- Additional information for applicants
- Additional information for interested parties

## 1.5 For what purposes do we process your data?

We process your data for a number of basic purposes, which we explain below (further information on the purposes of the individual applications can be found in the relevant sections, see below). These purposes represent legitimate interests of ours and, where applicable, of third parties. You will find further information on the legal basis for our processing in section 1.6.

We process your data for **communication** with you.

We process data for the establishment, administration and handling of **contractual relationships** and **employment relationships**.

We process data for **marketing purposes**, for **advertising** and for **relationship management**.

We process data for **market research**, to **improve services** and **processes** and for **product development**.

We may also process your data for **security purposes** and for **access control**.

We process personal data to **comply with laws, instructions and recommendations from authorities and internal regulations** ("compliance").

We process data for the purposes of our **risk management** and in the context of prudent **corporate governance**, including business organization and corporate development.

In the context of our **marketing databases**, we also process your data in order to make it available to **our customers for their own purposes**.

We may process your data **for other purposes**, e.g. as part of our internal processes and administration or for training and quality assurance purposes.

Further information on the purposes of data processing can be found in the additional information on the individual applications under "For what purpose do we process your data?" (click to go directly to the relevant applications):

- Additional information for (potential) contractual partners
- Additional information for newsletter subscribers
- Additional information for website visitors (incl. social media)
- Additional information for applicants
- Additional information for interested parties

## 1.6 On what basis do we process your data ?

One possible basis for data processing is your consent. If we ask for your **consent** for certain processing, we will inform you separately about the corresponding purposes of the processing. You can revoke your consent at any time in writing with effect for the future (our contact details can be found in section. 1.2. (for the revocation of your consent in the case of online tracking, cf. 4.2.4). If you have a user account, you may also be able to withdraw your consent or contact us via the relevant website or other service. Once we have received notification of the withdrawal of your consent (minor delays are possible due to the processing procedures), we will no longer process your data for the purposes to which you originally consented, unless we have another legal basis for doing so. The withdrawal of your consent does not affect the lawfulness of processing based on consent before its withdrawal.

Where we do not ask for your consent for processing, we base the processing of your personal data on the fact that the processing is necessary for the **initiation or execution of a contract** with you (or the entity you represent) or that we or third parties (e.g. our customers) have a **legitimate interest** in it, in particular to pursue the purposes described in each case. This includes, for example, the processing of offers and contracts, direct marketing, the interest in better understanding the markets and target groups of our customers, the optimization of our website, the improvement of our services or the minimization of the risk of payment default for us or our customers. However, this also includes compliance with **legal regulations**, insofar as compliance is not already recognized as a legal basis by the applicable data protection law.

If, in exceptional cases, we receive sensitive data (e.g. health data, information on political, religious or ideological views), we may also process your data on the basis of other legal grounds, e.g. in the event of disputes due to the necessity of processing for possible litigation or the enforcement of or defense against **legal claims**.

## 1.7 What applies to profiling and automated individual decisions?

We may use your data to automatically evaluate certain personal characteristics for the purposes listed below ("profiling"). We do this, for example, if we want to determine preference data for ourselves or our customers, but also to determine payment and creditworthiness risks or to carry out statistical evaluations. We can also create profiles for the same purposes, i.e. we can combine preference and other data in order to better understand you as a person with your different interests and other characteristics. We do this in the interests of our customers or in our own interests.

In certain situations, it may be necessary for us or our clients to automate certain decision-making processes for reasons of efficiency and that this has a legal effect or a possible disadvantage for you. This is referred to as "automated individual decisions". In this case, we or our customers (depending on who is responsible in the individual case) will inform you accordingly and take the measures required under applicable law .

## 1.8 To whom do we disclose your data?

In connection with our data processing and the corresponding purposes, we also transfer your personal data to third parties, in particular to the following categories of recipients:

- **Group companies:** A list of our group companies can be found here: [www.kueba.ch](http://www.kueba.ch). The group companies may use the data in accordance with this privacy policy for the same purposes as we do (see para. 1.5 and purposes of the individual applications).
- **Service providers:** We work with service providers in Germany and abroad who process data about you on our behalf or under joint responsibility with us or who receive data about you from us under their own responsibility (e.g. IT and cloud providers, shipping companies, advertising service providers, login service providers, banks, credit and debt collection agencies or credit agencies).
- **Contractual partners:** This initially refers to our customers and other contractual partners, as this data transfer arises from these contracts. If you work for such a contractual partner yourself, we may also transfer data about you to them in this context. The recipients also include contractual partners with whom we cooperate.
- **Public authorities:** We may disclose personal data to offices, courts and other authorities in Switzerland and abroad if we are legally obliged or entitled to do so or if this appears necessary to protect our interests. The authorities process data about you that they receive from us under their own responsibility.
- **Other persons:** This refers to other cases where the involvement of third parties arises from the purposes in accordance with para. 1.5 and the purposes of the individual applications.

All these categories of recipients may in turn involve third parties, so that your data may also become accessible to them. We can restrict the processing by certain third parties (e.g. IT providers), but not by other third parties (e.g. authorities, banks, etc.).

We also enable **certain third parties** to collect **personal data from you** on our website and at our events (e.g. media photographers, providers of tools that we have integrated on our website, etc.). Insofar as we are not decisively involved in this data collection, these third parties are solely responsible for it. If you have any concerns and wish to assert your data protection rights, please contact these third parties directly.

Further information on the possible disclosure of personal data can be found in the additional information on the individual applications under "To whom do we disclose your data?" (click to go directly to the relevant applications):

- Additional information for (potential) contractual partners
- Additional information for newsletter subscribers
- Additional information for website visitors (incl. social media)
- Additional information for applicants
- Additional information for interested parties

## 1.9 Is your personal data also sent abroad?

As described in no. 1.8 we also disclose data to other bodies. These are not only located in Switzerland. Your data may therefore be processed both in Europe and in other countries, such as the USA.

Foreign recipients are often located in a country with adequate legal data protection (see [here](#) from the perspective of Switzerland and [here](#) from the EU). If a recipient is located in a country without adequate legal data protection, we contractually oblige the recipient to comply with data protection (we normally use the standard contractual clauses of the European Commission, which can be accessed [here](#)), unless the recipient is already subject to a legally recognized set of rules to ensure data protection and we cannot rely on an exemption clause. An exception may apply in particular in the case of legal proceedings abroad, but also in cases of overriding public interests or if the performance of a contract

requires such disclosure, if you have given your consent or if the data in question has been made generally accessible by you and you have not objected to its processing.

Please also note that data exchanged via the Internet is often routed via third countries. Your data may therefore be sent abroad even if the sender and recipient are located in the same country.

Further information on the possible transfer of personal data abroad can be found in the additional information on the individual applications under "Is your data also transferred abroad?" (click to go directly to the relevant applications):

- Additional information for (potential) contractual partners
- Additional information for newsletter subscribers
- Additional information for website visitors (incl. social media)
- Additional information for applicants
- Additional information for interested parties

#### 1.10 How do we protect your data?

We take appropriate security measures to protect the confidentiality, integrity and availability of your personal data, to protect it against unauthorized or unlawful processing and to counteract the risks of loss, unintentional alteration, unwanted disclosure or unauthorized access.

#### 1.11 What rights do you have?

Under certain circumstances, the applicable data protection law grants you the right to object to the processing of your data or to request its restriction, in particular for the purposes of direct marketing, profiling for direct marketing and other legitimate interests in processing.

To make it easier for you to control the processing of your personal data, you also have the following rights in connection with our data processing, depending on the applicable data protection law:

- The right to request information from us as to whether and which of your data we process
- the right to have us correct data if it is incorrect
- the right to request the deletion of data
- the right to request that we provide you with certain personal data in a commonly used electronic format
- the right to withdraw consent where our processing is based on your consent
- the right to receive further information on request that is helpful for exercising these rights
- the right to object to automated individual decisions (Section 1.7) to express your point of view and to request that the decision be reviewed by a natural person

If you wish to exercise any of the above-mentioned rights against us, you can contact us at any time using the contact details provided in Section 1.2 contact details mentioned in section 1.2. So that we can rule out misuse, we normally require clear identification from you (e.g. a copy of your ID).

Please note that these rights are subject to conditions, exceptions or restrictions under the applicable data protection law (e.g. to protect third parties or business secrets). We will inform you accordingly if necessary.

If you do not agree with our handling of your rights or data protection, please inform us or our data protection officer (para. 1.2) please let us know. In particular, if you are located in the EEA, the United Kingdom or Switzerland, you also have the right to lodge a complaint with the data protection supervisory authority in your country.

#### 1.12 Can this DS declaration be amended?

This privacy policy is not part of any contract with you. We may amend this privacy policy at any time. The version published on this website is the current version.

Last update: 01.01.2023

## 2 Additional information for (potential) contractual partners

This information may be relevant to you if you have a direct business relationship with us or if we (or you) wish to establish such a relationship. On the one hand, this may be if we offer you our products or services or if you have already placed an order with us, i.e. if we can count you among our customers or interested parties. But it can also go in the other direction if you offer us your products or services as a potential supplier or have already sold something to us.

We operate primarily in the B2B market (business customer market), so there is a good chance that you have a relationship with us as a representative of a company or organization. In the following, we will inform you about data processing in the context of this existing (or emerging) business relationship.

Please also refer to the General Information (Section 1) and, if required, the additional information for newsletter subscribers (Section 3) and for website and social media visitors (para. 4).

### 2.1 Summary using the privacy icons

Type of personal data:



Source of the personal data:



Purpose of the processing:

Special processing:



Passing on to third parties:

Place of processing:



### 2.2 What data do we process and for how long?

In relation to your role as a contractual partner, we process data that we explain below. Further information can be found in sec. 3.2 and 4.2 for the online area. Please also note the general information in section 1.3.

- Contract data:** This is data that arises in connection with the initiation or conclusion of a contract, e.g. details of quotations, order confirmations, orders or contracts and the services to be provided or provided. As a rule, we collect this data directly from you, from contractual partners and from third parties involved in the execution of the contract, but also from third-party sources (e.g. providers of credit rating data) and from publicly accessible sources. As a rule, we store this data for a maximum of 10 years from the last contractual activity, but at least from the end of the

contract. This period may be longer if this is necessary for reasons of proof or to comply with legal or contractual requirements or for technical reasons.

- **Master data:** We define master data as the basic data that we require in addition to the contract data for the processing of our contractual and other business relationships or for marketing and advertising purposes. This includes, for example, your name, contact details and information about your role and function, your date of birth, customer history or signature authorizations. We receive master data from you yourself (e.g. when you make a purchase or register), from bodies for which you work or from third-party sources such as public registers or the internet (websites, social media, etc.). As a rule, we store this data for a maximum of 10 years from the last exchange between us, but at least from the end of the contract. This period may be longer if this is necessary for reasons of proof or to comply with legal or contractual requirements or for technical reasons .
- **Communication data:** If you are in contact with us via the contact form, by e-mail, via telephone or chat, by letter or via other means of communication, we record the data exchanged between you and us, including your contact details and the marginal data of the communication. In addition, we may record video conferences or web seminars for documentation purposes. You will be informed if such recordings take place, e.g. by a corresponding announcement. If you do not wish to be recorded, please let us know or end your participation. If you simply do not want your image to be recorded, please switch off your camera. As a rule, these recordings are also edited so that only the speakers are visible and no personal data of the participants is recognizable. If we want or need to establish your identity, we will collect data to identify you (e.g. a copy of an ID card). As a rule, we store this data for a maximum of 10 years. This period may be longer if this is necessary for reasons of proof or to comply with legal or contractual requirements or for technical reasons. E-mails in personal mailboxes, chats and written correspondence are generally stored for a maximum of 10 years.
- **Registration data:** Certain offers (e.g. our web store) can only be used with a user account or registration. In this case, you must provide us with certain data and we collect data on the use of the offer or service. Registration data may also be required for access controls to certain facilities or events. As a rule, we retain registration data for a maximum of 10 years after the end of use of the service or the termination of the user account.
- **Behavioral and preference data:** Depending on the exact relationship we have with you, we try to get to know you and better tailor our communications, products, services and offers to you. To do this, we collect and use data about your behavior and preferences. We do this, for example, by evaluating information about your behavior in our area, and we can also supplement this information with data from third-party sources. Based on this, we can, for example, calculate the probability that you will use certain services or behave in a certain way. Some of the data processed for this purpose is already known to us (e.g. that you have used a service), or we obtain this data by recording your behavior (e.g. how you navigate our website, more information on this can be found in section. 4). We anonymize or delete this data when it is no longer relevant for the purposes pursued, normally after a maximum of 10 years. This period may be longer if this is necessary for reasons of proof or to comply with legal or contractual requirements or for technical reasons. We describe how tracking works on our website in section 4.2.4
- **Other data:** We may also collect data from you in other situations. In connection with official or judicial proceedings, for example, data is collected (such as files, evidence, etc.) that may also relate to you. We may receive or produce photos, videos and audio recordings in which you may be recognizable (e.g. at events, through security cameras, etc.). We may also collect data about who enters certain buildings or has access rights to them and when (including during access controls, based on registration data or visitor lists, etc.), who takes part in events or campaigns (e.g. competitions or special acquisition campaigns) and when, or who uses our infrastructure and systems and when. The retention period for this data depends on the purpose and is limited to what is necessary. This ranges from 1 month for recordings from security cameras to reports on events with images that can be stored for several years or longer.

### 2.3 For what purpose do we process your data?

We process your data as a contractual partner for the purposes explained below. Further information can be found in para. 3.3 and 4.4 for the online area. These purposes represent legitimate interests on our part and, where applicable, on the part of third parties. You will find further information on the legal basis for our processing in Section 1.6. Please also note the general information in para. 1.5.

We process your data for **communication** with you, in particular to respond to inquiries and to contact you in the event of queries. For this purpose, we use in particular communication data and master data and, in connection with offers and services used by you, also registration data. We may retain this data to document our communication with you, for training purposes, for quality assurance and for follow-up questions. We process data for the initiation, administration and processing of **contractual relationships**.

We process data for **marketing purposes** and to **maintain relationships**, e.g. to send our customers and other contractual partners personalized advertising about our products and services. This may take the form of newsletters and other regular contacts (electronically, by post, by telephone), via other channels for which we have your contact information, but also as part of individual marketing campaigns (e.g. events, competitions, etc.). In particular, we also send our newsletter to contractual partners whose contact details we have received as part of a sale and have stored in our CRM system (see also 3). You can refuse such contacts at any time or refuse or revoke any consent that may be required in this context. In some cases, with your consent, we can target our online advertising on the Internet more specifically to you (cf. 4).

We continue to process your data for **market research**, to **improve** our services and operations and for **product development**.

We may also process your data for **security purposes** and for **access control**.

We process personal data to comply with **laws, instructions and recommendations from authorities and internal regulations** ("compliance").

We also process data **for** the purposes of our **risk management** and as part of prudent **corporate governance**, including business organization and corporate development .

We may process your data for **other purposes**, e.g. as part of our internal processes and administration or for training and quality assurance purposes.

### 2.4 To whom do we disclose your data?

In the context of contracts, our services and products, our legal obligations or otherwise to protect our legitimate interests and the other purposes listed in Section 2. 2.3 we also transfer your personal data to third parties, in particular to the third parties listed in para. 1.8 categories of recipients.

### 2.5 Is your personal data also sent abroad?

As described in Sect. 2.4 we also disclose data to other bodies. These are not only located in Switzerland. Your data may therefore be processed both in Europe and in other countries. You can find more detailed information on the relevant principles and measures in section 1.9.

### 3 Additional information for newsletter subscribers

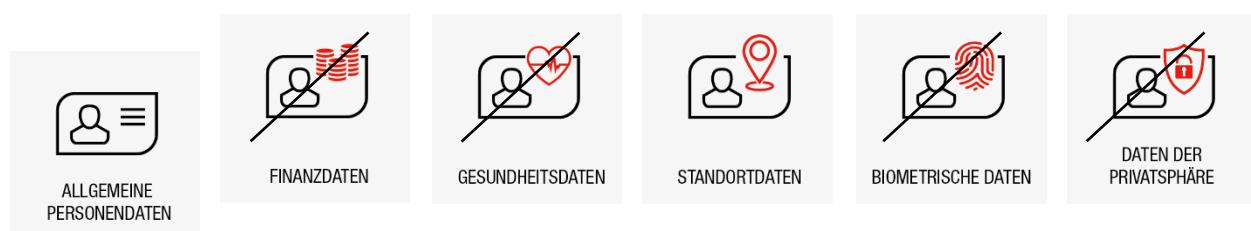
This information may be relevant to you if you receive, have subscribed to or would like to subscribe to one of our newsletters. Before you subscribe to our newsletter, you can find out here how we process your data in the context of such a newsletter subscription. This enables you to make an informed decision as to whether you agree to the newsletter being sent and the associated data processing and whether you wish to consent to it being sent. If you already receive one of our newsletters, you can also find out about the corresponding data processing here (this may also be the case if you are a contractual partner, see also 2.3). If you subsequently no longer agree to this, you can withdraw your consent to receive the newsletter at any time.

By registering, you give us your consent to process the data provided for the regular dispatch of the newsletter to the address you have provided and for the statistical evaluation of user behavior and the optimization of the newsletter (for more information, see Section. 3.3 and para. 3.4).

*Note: The terms "newsletter subscription" and "newsletter registration" mean the same thing to us in this context.*

#### 3.1 Summary using the privacy icons

Type of personal data:



Source of the personal data:



Purpose of the processing:

Special processing: Transfer to third parties: Place of processing:



### 3.2 What data do we process and for how long?

If you would like to subscribe to our newsletter on one of our websites, you can normally do so using a form with the following fields (other forms are possible):

- Salutation
- First and last name
- E-mail address\*

The information marked with \* is mandatory if you wish to receive our newsletter, the other fields are optional. After entering this information, you can initiate the registration for our newsletter. We use the so-called "double opt-in" mechanism. This means that after submitting your registration, you will receive an e-mail from us containing a confirmation link. To definitely register for the newsletter, you must confirm this link. This confirmation data may also be stored by us, e.g. date, time and your IP address used.

For each newsletter sent, we also store information on the address file used, the subject and the number of newsletters sent. In addition, you can see which addresses have not yet received the newsletter or to which address it has been sent and which addresses have failed to receive it. You can also see which addresses have opened the newsletter. For this purpose, we use a so-called web beacon (for more information, see section 3.4) Finally, we process the information about which addresses have unsubscribed.

We process your data for as long as required by our processing purposes, the statutory retention periods and our legitimate interests in processing (including for documentation and evidence purposes) or for as long as storage is technically necessary. You can unsubscribe from our newsletter at any time. You will find an unsubscribe link in all newsletter emails. Additional contact details can be found in section 1.2. If you unsubscribe from our newsletter or ask us to remove you from the mailing list, your email address will be blocked and we will deactivate your profile. This blocking (instead of deletion) can prevent your email address from being re-added to our mailing list from another source (e.g. via our CRM) and you from receiving our newsletter again.

We can process anonymized or aggregated data without personal reference even after you have unsubscribed.

Please also note the general information on this issue in Section 1.3

### 3.3 For what purpose do we process your data?

With regard to our newsletter, we process your personal data in order to send you a personalized newsletter with your consent. In this way, you will receive relevant information and offers from us and we can address you personally (i.e. with your name).

We also use your data for statistical purposes and to optimize the newsletter, e.g. in terms of content and structure. This enables us to better tailor the information and offers in our newsletter to the individual interests of the recipients.

Please also note the general information on the purposes in Section 1.5.

### 3.4 Do we use online tracking as part of our newsletter?

Yes, this is possible. Our newsletter may, for example, contain a so-called web beacon (tracking pixel) or similar technical means. A web beacon is a 1x1 pixel, invisible graphic that is associated with the user ID of the respective newsletter subscriber.

The web beacon is deleted when you delete the newsletter. To prevent the use of the web beacon in our newsletter, you can set your mail program (e.g. Outlook) so that no HTML is displayed in the messages.

Our newsletters often contain links to other sources of information. These may be, for example, our own or third-party websites or articles in social media. If you click on such a link, we may also register this and save your behavior. If the link leads to our own sources (e.g. one of our websites), under certain circumstances we may also track and analyze your behavior on this source. You can find out more about this under point 4. If a link leads to the website of a third party, it is also possible that this third party will also evaluate your behavior on its website.

### **3.5 To whom do we disclose your data?**

We use our own email marketing solution [XCampaign](#) to send our newsletter. The data is hosted by us in Switzerland or on our own servers at Super Network s.r.o. in Prague, Czech Republic.

We may also pass on your data including tracking information to other third parties, e.g. to contractual partners. Please also note the general information in para. 1.8.

### **3.6 Is your personal data also sent abroad?**

Yes, as in no. 1.9 your data may also be transferred abroad. This also applies to data that we process as part of our newsletter.

## 4 Additional information for website visitors (incl. social media)

This aspect may be of interest to you if you visit one of our websites. However, it may also affect you if you wish to find out more about us or connect with us on social networks or social media platforms. In these cases, it is not always obvious what data is collected and processed about you (possibly in the background). For this reason, we inform you about this data processing in this section. This allows you to make an informed decision about whether and how you wish to interact with us via our websites or via a social media profile.

### 4.1 Summary using the privacy icons

Type of personal data:



Source of the personal data:



Purpose of the processing:

Special processing: Transfer to third parties: Place of processing:



### 4.2 What data do we process and for how long?

The general information on the question "What data do we process and for how long?" can be found under point 1.3 and Sect. 1.4 of this privacy policy. In this section, we would like to answer this question in more detail for our data processing in the online area.

#### 4.2.1 Log files

When you visit our website, the server temporarily stores every access in a log file. Until automated deletion, the IP address of the requesting computer, the date and time of access, the name and URL of the retrieved file, the website from which the access was made, the operating system of the computer used by the user and the browser used by the user as well as the country from which the user accessed the website are automatically obtained.

This data is normally collected and processed anonymously, i.e. without any personal reference. However, in the event of an attack on our network infrastructure or if there is a suspicion of other unauthorized or abusive website use, the IP address can be evaluated for clarification and defense purposes and, if necessary, used in the context of criminal proceedings for identification and for civil and criminal proceedings against the users concerned.

#### 4.2.2 Contact form

On certain pages of the website you will find a button or a link that will take you to our contact form. We use the data you enter to answer the questions you have asked or to provide the services you have requested and, if necessary, to contact you by telephone.

Please also note the information for (potential) contractual partners in Section 0

#### 4.2.3 Third party services

We use the services of third parties for certain digital services and infrastructures. For example, we sometimes host our websites and other digital services with external service providers, including [METANET](#) or Mailprofiler Development s.r.o., Reznicka 1332/7, Czech Republic. In this context, personal data may also be stored on Mailprofiler servers or with other service providers.

We also use the services of third parties to provide media and other display elements on our websites. For example, we embed [YouTube videos \("My data on YouTube"\)](#) and use fonts from [fonts.com](#) and [Google Fonts](#). This may also result in the transfer of certain data.

Third-party services are also used to protect our online offerings from abusive applications. For example, we protect our websites using the Google [reCaptcha](#) service.

#### 4.2.4 Online tracking and online advertising (incl. cookies)

We use various technologies on our website with which we and third parties engaged by us can recognize you when you use it and, under certain circumstances, track your use over several visits. We will inform you about this in this section.

Essentially, this is so that we can distinguish access by you (via your system) from access by other users. We do not want to infer your identity, even if we can, insofar as we or third parties engaged by us can identify you by combining you with registration data. Even without registration data, however, the technologies used are designed in such a way that you are recognized as an individual visitor each time you visit a page, for example by our server (or the servers of third parties) assigning a so-called "cookie" to you or your browser. Cookies are information files that your web browser stores on your computer's hard disk when you visit our website. Cookies can contain the following information, for example:

- Browser type/version
- Operating system used
- Referrer URL (the previously visited page)
- Host name of the accessing computer (IP address)
- Time of the server request
- Device / Device type

We use such techniques on our website and allow certain third parties to do the same. However, depending on the purpose of these techniques, we may ask for your consent before using them. You can program your browser to block or deceive certain cookies or alternative technologies or to delete existing cookies. You can also add software to your browser that blocks tracking by certain third parties. You can find further information on this in the help pages of your browser (usually under the heading "Data protection") or on the websites of the third parties listed below. In addition, you can prevent the collection and processing of the data generated by the cookie with a [plugin](#).

A distinction is made between the following types of cookies (the other technologies are also included here):

**Functional cookies (mandatory):** Some cookies are necessary for the functioning of the website as such or certain functions. They ensure, for example, that you can switch between pages without losing information entered in a form. They also ensure that you remain logged in. These cookies are only temporary ("session cookies"). If you block them, the website may not work. Other cookies are necessary so that the server can save decisions or entries made by you beyond a session (i.e. a visit to the website) if you use this function (e.g. selected language, consent given, the function for automatic log-in, etc.). These cookies are often deleted at the end of the session or when the browser is closed. Otherwise, they have an expiry date of up to 24 months.

**Statistical cookies:** In order to optimize our website and the corresponding offers and to better tailor them to the needs of users, we use cookies to record and analyze the use of our website, possibly even beyond the session. We often do this by using analysis services from third-party providers (see e.g. para. 4.2.5). Statistical cookies also have an expiry date of up to 24 months. Details can be found on the websites of the third-party providers.

**Marketing cookies:** We and our advertising contract partners have an interest in targeting advertising to specific groups, i.e. only displaying it to those who might be interested in it, e.g. with the help of Google Analytics Remarketing. For this purpose, we and our advertising contract partners - if you consent - also use cookies with which the content accessed or contracts concluded can be recorded. This enables us and our advertising contract partners to display advertising that we can assume is of interest to you on our website, but also on other websites that display advertising from us or our advertising contract partners. Depending on the situation, these cookies expire after a few days or up to 24 months. If you consent to the use of these cookies, you will be shown appropriate advertising. If you do not consent to these cookies, you will probably not see less advertising, but simply advertising content from other providers.

In addition to marketing cookies, we use other techniques to control online advertising on other websites and thereby reduce wastage. For example, we may transmit the email addresses of our users, customers and other persons to whom we wish to display advertising to operators of advertising platforms (e.g. social media, see Section. 4.3). If these persons are registered there with the same e-mail address (which the advertising platforms determine by means of a comparison), the operators display the advertising placed by us to these persons in a targeted manner (so-called custom audiences and lookalikes). The operators do not receive the email addresses of people who are not already known. In the case of known email addresses, however, they learn that these people are in contact with us and what content they have accessed.

#### 4.2.5 Google Analytics and Tag Manager

We currently use the following solutions to analyze our online tracking and, in some cases, online advertising:

**Google Analytics:** The provider of the "Google Analytics" service is Google LLC. For the purposes of the GDPR and the FADP, Google Ireland Ltd. is responsible (both "[Google](#)"). Google uses statistical cookies (see above) to track the behavior of visitors to our website (duration, frequency of pages accessed, geographical origin of access, etc.) and on this basis compiles reports for us on the use of our website and how you found your way to our website (via Google Ads, impressions in the Google Display Network, organic searches, etc.). Google provides us with reports and can therefore be regarded as our data processor. However, Google also processes data for its own purposes and may be able to draw conclusions about the identity of visitors based on the data collected, create personal profiles and link this data to the Google accounts of these individuals. You should assume that this processing will take place if you consent to the use of statistical cookies.

You can find information on Google Analytics data protection [here](#) and if you have a Google account, you can find further information on processing by Google [here](#).

Our websites may also use the Google Tag Manager. The tool triggers other programs and services that may in turn collect data, in particular for Google Analytics (see above). Google Tag Manager does not access this data. If deactivation has been carried out at domain or cookie level, this remains in place for all tracking tags that are implemented with Google Tag Manager. You can find Google's privacy policy for this tool [here](#).

#### 4.2.6 User analysis by permaleads.ch

Our websites occasionally use the permaleads.ch service of permagroup GmbH, Neugutstrasse 54, 8600 Dübendorf, for the analysis of user behavior and the identification of your IP address. The use of this service means that data about your website visit (e.g. IP address, time of access, user behavior, browser request, etc.) is transmitted directly to the permagroup GmbH servers and made available for our exclusive use. We enrich this information with data from our own [business database](#) in order to identify companies that visit our websites. If you no longer wish to be identified in future, please send an e-mail to optout(at)permaleads.ch.

### 4.3 What data do we process on our pages in social networks?

We may operate pages and other online presences ("fan pages", "channels", "profiles", etc.) on social networks and other platforms operated by third parties and provide the services described in Section 1. 1.3 and below about you. We receive this data from you and the platforms when you come into contact with us via our online presence (e.g. when you communicate with us, comment on our content or visit our presences). At the same time, the platforms evaluate your use of our online presence and link this data with other data about you known to the platforms (e.g. about your behavior and preferences). The platforms also process this data for their own purposes under their own responsibility, in particular for marketing and market research purposes (e.g. to personalize advertising) and to control their platforms (e.g. which content they display to you).

We may redistribute content published by you (e.g. comments on an announcement) ourselves (e.g. in our advertising on the platform or elsewhere). We or the operators of the platforms may also delete or restrict content from or about you in accordance with the usage guidelines (e.g. inappropriate comments).

For further information on the processing carried out by the platform operators, please refer to the platforms' data protection notices. There you can also find out in which countries they process your data, what rights of access, erasure and other rights of data subjects you have and how you can exercise these or obtain further information. We currently use the following platforms in particular:

**Facebook:** Here we operate the pages [www.facebook.com/kbdirect.ch](http://www.facebook.com/kbdirect.ch) and [www.facebook.com/xcampaign.info](http://www.facebook.com/xcampaign.info). The entity responsible for operating the platform for users from Europe is Facebook Ireland Ltd, Dublin, Ireland. Their privacy policy is available [here](#). **YouTube:** Here we operate one channel for [KünzlerBachmann Directmarketing](#) and one for [XCampaign](#). The controller and provider of the YouTube service is Google. Google Ireland Ltd, Dublin, Ireland, is responsible for the purposes of the GDPR and the FADP. Their privacy policy is available [here](#).

**Linkedin:** Here we operate the profiles [www.linkedin.com/company/künzlerbachmann-directmarketing-ag/](http://www.linkedin.com/company/künzlerbachmann-directmarketing-ag/) and [www.linkedin.com/company/xcampaign/](http://www.linkedin.com/company/xcampaign/). The controller for the operation of the platform is LinkedIn Ireland Unlimited Company, Dublin, Ireland. Their privacy policy is available [here](#), the cookie policy can be found [here](#).

**XING:** Here we operate the two profiles [www.xing.com/pages/kunzlerbachmann-directmarketingag](http://www.xing.com/pages/kunzlerbachmann-directmarketingag) and [www.xing.com/pages/xcampaign](http://www.xing.com/pages/xcampaign). The controller for the operation of the platform is New Work SE, Hamburg, Germany. Their data protection information is available [here](#).

From time to time, we also place paid advertisements on these platforms. In order to address the appropriate target groups, we sometimes work with custom audiences and lookalikes (see also sec. 4.2.4).

#### 4.4 For what purpose do we process your data?

In principle, we process your data for the purposes described in para. 1.5 for the overriding purposes listed. We process your data on our websites and social media profiles for the following purposes in particular:

- To enable the use of the website (connection establishment), to ensure system security and stability in the long term
- To evaluate the use of our websites, to compile reports on website activity and to provide other services relating to website activity and internet usage for the purposes of market research and the needs-based design of these websites
- To design and continuously optimize our websites and social media profiles to meet your needs
- In order to be able to address our (potential) customers in a personal and personalized manner and offer them optimal, individual solutions
- To be able to answer contact requests
- For marketing and communication purposes
- to control online advertising on websites and social media platforms and thus reduce wastage
- In connection with Google Analytics, we sometimes use the "Audiences" functionality so that we can summarize our website users into certain audience groups (marketing target groups) with comparable profiles in the reports based on website usage and the usage profiles created

#### 4.5 To whom do we disclose your data?

A list of the possible categories of data recipients can be found in Section. 1.8. Here in no. 4.5 we also mention specific data recipients and, for the sake of clarity, list once again the categories of data recipients already mentioned in the previous section. 4.4 for a better overview.

- [METANET \(Switzerland\)](#)
- Mailprofiler Development s.r.o. (Czech Republic)
- Google incl. YouTube (Ireland / USA)
- [fonts.com \(USA\)](#)
- [permagroup.ch \(Switzerland\)](#)
- [SEMSEA Search Engine Marketing AG \(Switzerland\)](#)
- Facebook (Ireland / USA)
- LinkedIn (Ireland / USA)
- XING (Germany)

*Please note: When you visit our websites and our social media profiles, certain data may be passed on to the recipients listed above, but this does not necessarily have to be the case. This list is not exhaustive at all times, please consult the categories of data recipients in section. 1.8.*

#### 4.6 Is your personal data also sent abroad?

Yes, as you can see from the list above, your data can also be transferred abroad, including to the USA. We would like to explain this in more detail using Google as an example:

Your data from the applications described above may be transferred to Google servers in the USA and stored there. The IP address is shortened by activating IP anonymization ("anonymizeIP") on our websites before transmission within the member states of the European Union or in other contracting states of the Agreement on the European Economic Area or Switzerland. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and truncated there.

For the sake of completeness, we note that the US authorities can carry out surveillance measures within the framework of US legislation, in the context of which the general storage of all data transferred from the European Union to the USA is possible. This is done without distinction, restriction or exception on the basis of the objective pursued and without objective criteria that would make it possible to restrict the US authorities' access to personal data and its subsequent use to specific, strictly limited purposes that would justify access to this data.

We would like to point out to users residing in a member state of the EU that the USA does not have an adequate level of data protection from the perspective of the European Union. Insofar as we have explained in this data protection declaration that recipients of data (such as Google) are based in the USA, we will take special measures in accordance with Section 1.9. 1.9 to ensure that your data is protected at an appropriate level by our partners.

## 5 Additional information for applicants

Are you interested in a job with us? We are very pleased to hear that! If you apply to us, we will process your personal data. In this section, we would like to inform you about possible data processing in connection with an application.

Please also note the general information in para. 1 of this privacy policy.

*A note on the status: The current version of this privacy policy applies at the start of the application process.*

### 5.1 Summary using the privacy icons

Type of personal data:



Source of the personal data:



Purpose of the processing:

Special processing: Transfer to third parties: Place of processing:



### 5.2 What data do we process and for how long?

When you apply for a job, we process the personal data that we need to assess your suitability for the advertised position. This includes the following information in particular:

- the information entered in an online form, if applicable
- the information contained in the documents submitted (e.g. in the cover letter, CV, certificates, etc.)
- if you have previously worked or applied for a job with us, we may use the information we already have as a result
- we may consult information from third-party sources if necessary (for example, information from official registers, information from recruitment agencies, reference information and other job-related, public information from the Internet, such as a LinkedIn or Facebook profile)

If you provide us with particularly sensitive personal data as part of your application (e.g. health data), we may also process such personal data.

You are not obliged to provide us with personal data. However, it is not normally possible to process an application without us collecting and processing the necessary personal data.

We store your personal data for as long as it is necessary to carry out the specific application process or to comply with legal requirements and for as long as we have a legitimate interest in storing it, e.g. for documentation and evidence preservation purposes and to safeguard and defend legal claims. If we are able to consider you for the position for which you have applied, we will also retain your personal data for the duration of the employment relationship. If no employment contract is concluded with you, your personal data will be deleted or anonymized. In addition, we will only store your personal data if you have consented to it being stored for longer, e.g. to keep your application pending for any further vacancies.

Further general information on the question of "what data do we process and for how long" can be found in para. 1.3 and Sect. 1.4 of this privacy policy.

### **5.3 For what purpose do we process your data?**

We process personal data in accordance with this privacy policy only for the purpose of receiving and checking the application documents and your suitability for the position in question and, if necessary, preparing and concluding a contract. Depending on the job profile, this may also include checking references and carrying out background checks. This processing is necessary for the preparation and, if applicable, the conclusion of an employment contract; for the fulfillment of legal obligations; for the exercise of rights; for the protection of interests, in particular in an orderly human resources system. We also use your personal data to be able to contact you again with regard to other positions or to forward your application to other companies in the Group if we are unable to offer you a suitable position. If this is required by law, we will obtain your consent to do so.

Further general information on the purpose of our data processing can be found in para. 1.5.

### **5.4 To whom do we disclose your data?**

In principle, only persons who are involved in filling this position have access to your personal data, in particular HR specialists and potential superiors of the company responsible. We may also pass on your personal data to our service providers, in particular IT service providers or external personnel offices. We ensure that data protection is also guaranteed by service providers through the selection of service providers and contractual agreements.

Further general information on possible data recipients can be found in Section. 1.8 of this privacy policy.

### **5.5 Is your personal data also sent abroad?**

It is possible that your data may also be passed on to third parties abroad (e.g. Group companies or service providers) as part of your application or for the above-mentioned purposes.

Further general information on the disclosure of personal data abroad can be found in para. 1.9 of this privacy policy

## 6 Additional information for interested parties

This aspect may be relevant to you if your data is recorded in one of our marketing databases. This may be the case, for example, if we have taken your data from a publicly accessible directory (such as the telephone book or commercial register) and stored it in one of our databases. Our most important databases are kbCONSUMER (information on private individuals) and kbBUSINESS (information on companies and in some cases on contact persons within the companies). The basis of both databases is kbBUILDING (information on buildings and other geographical levels).

Here you can find out how your data may have found its way into our databases and which data, sources and processing this involves.

Further basic information can be found in the General Information under Section 1. Here in the "Information for interested parties", this information is specified or expanded in relation to the relevant applications.

### 6.1 Summary using the privacy icons

Type of personal data:



Source of the personal data:



Purpose of the processing:

Special processing: Transfer to third parties: Place of processing:



### 6.2 What data do we process and for how long?

We process various categories of personal data as part of **kbCONSUMER**. They often come from publicly accessible sources (e.g. address and contact data from the telephone directory) or are obtained from other sources (e.g. address changes from the post office). Some of the data is also calculated statistically (e.g. purchasing power or the probability of belonging to one sinus milieu is greater than another). We process the following categories of personal data:

- Address data (e.g. salutation, title, name, address)
- Contact details (e.g. language, telephone number, email)

- Historical data (e.g. source of the address, previous residential addresses)
- Known advertising blocks per channel (e.g. star entry in the telephone directory, Robinson list)
- Regional data (e.g. language area, see also "kbBUILDING" below)
- Data on address quality (e.g. number of successful deliveries, returns reports, status reports from Swiss Post, findability in the current telephone directory)
- Socio-demographic data (e.g. occupation, age group, statistical purchasing power)
- Household data (e.g. household size, number of children, main or secondary residence)
- Data on behavior and attitudes (e.g. probability of a certain sinus milieus, probability of donating, affinities to certain product groups and topics)
- Data on creditworthiness (creditworthiness traffic light from the Swiss Creditreform Association)
- \*Data on company connections (e.g. board of directors mandates)

\*In some cases, we can establish a link between an entry in kbCONSUMER and an entry in kbBUSINESS. For example, we can determine whether someone has a board mandate.

As part of **kbBUILDING**, we process additional data categories. Normally, this is not personal data per se, but information on various geographical levels such as house, microcell (at least 4 to 5 households combined), hectare grid (100x100m) or municipality. However, a link with kbCONSUMER can also create a personal reference for this data. The following data categories are involved:

- Master information about the house (e.g. official Egid, geographical coordinates, no. of floors, no. of rooms, no. of rooms) floors, no. apartments, last renovation, age of the building)
- Marketing information on the house (e.g. stop-sticker density, delivery volume for unaddressed advertising)
- Published information (e.g. from the Building Bulletin) on planning applications (e.g. type of application [new build, conversion, etc.], construction costs, duration of the project, client)
- Published information from real estate advertisements (e.g. property type, price, living space, land area)
- Further information on the house or microcell (e.g. average purchasing power, age focus, proportion per sinus milieus, donation probability)
- Information on the immediate living environment (e.g. dominant house size, relocations and fluctuation, average household structure, age focus, proportion per sinus milieus)
- Hectare grid data from the BfS, aggregated to units of 100x100m (e.g. heating types, preferred energy sources, no. of apartments by apartment size). apartment by apartment size)
- Information on the municipality, district or canton (e.g. rural / urban, size of municipality, tax level, number of primary and secondary residences). first or second homes)

All the personal data mentioned above under kbCONSUMER can also be aggregated and stored and edited at the various geographical levels in kbBUILDING.

As part of **kbBUSINESS**, we primarily process company data, which as such is not relevant for data protection because it is not personal data. However, if it makes sense for our purposes, we also try to process information on contact persons in these companies. This, in turn, may affect you as an interested party, as it may result in a personal reference. In such cases, we may process the following categories of personal data:

- Address data (e.g. salutation, title, name, company address)
- Contact details (e.g. language, telephone number, email)
- Information on position (e.g. sole decision-maker, function in the company)
- Further information about the company (e.g. sector, size, age)

As mentioned above, in some cases we can create a link between an entry in kbCONSUMER and an entry in kbBUSINESS (e.g. we can assign company-related directorships to a private address). In this way, we can also link further information between these two databases and use them mutually to qualify and better evaluate the available information.

We process your data for as long as it is useful for our purposes. If you object to the processing or request deletion, we will delete the data or set it to inactive. Depending on your needs or wishes, one or the other solution may make more sense. For example, blocking often makes more sense because it prevents your data from being re-entered into our databases from another source. If in doubt, we will consult with you and find the best solution for you.

Further basic information on the data processed by us and the duration of processing can be found in Section 1.3 and para. 1.4.

### 6.3 For what purpose do we process your data?

In principle, we process your data in order to build up and maintain databases that are as complete and up-to-date as possible. We make these databases available to our customers (usually in parts) so that they can use them for their own purposes (for more information on the possible data recipients, please refer to para. 6.4).

**Our own purposes are in the details:**

- We operate marketing databases for marketing, analysis and reference purposes
- We provide data for addressing physical advertising mailings and for telemarketing (e.g. appeals for donations)
- We send marketing e-mails on behalf of our customers (additional rules from the UWG apply here)
- We use various sources to maintain, qualify and update our databases (e.g. postal returns)
- We link our databases with each other and use each other's information for maintenance, qualification and updating
- We can also use mathematical-statistical methods, e.g. to make address selection even more targeted and minimize so-called "wastage"
- We make this information available to our customers so that they can use it to maintain, qualify and keep their own databases up to date
- We provide our customers with creditworthiness information from our partners in order to support them in minimizing payment risks (in doing so, we or our partners rely on the overriding interest of our customers, often documented by official proof of interest)
- We provide our customers with information for identity verification

### 6.4 To whom do we disclose your data?

General information on the possible data recipients can be found in section 1.8.

We also disclose your data to our customers specifically in the context of the applications mentioned in this Section 6 (for interested parties). The majority of these are companies and organizations that engage in marketing or fundraising or wish to maintain, enrich, refine or analyse their own databases. Some of our clients also provide identity verification services, such as checking and/or validating the identity of individuals for anti-money laundering, age verification, anti-fraud and pre-employment verification purposes. Our clients may come from a wide range of industries or sectors and may also be traders or resellers of the services mentioned.

We also pass on your data to the "Schweizerischer Verband Creditreform" cooperative, which processes it for its own purposes. This link will take you to the privacy policy:

<https://www.creditreform.ch/en/your-right/your-right>

We also pass on your data to Swisscom Directories AG (localsearch), which processes it for its own purposes. You can access the privacy policy via this link:

<https://www.localsearch.ch/en/privacy-statement/>

#### 6.5 Is your personal data also sent abroad?

Yes, your data may also be transferred abroad. On the one hand, we have processors abroad; on the other hand, customers from abroad may also obtain our data and use it for marketing or other purposes (see also section 6.4.4 above). 6.4)

Further information on possible onward transfers abroad can be found in Section 1.9.