

# PROTECTION OF PERSONAL DATA

FROM THE WEBSITE 1818.COM

VALID FROM [09.04.24]

## 1. PREAMBLE

- 1.1 The website 1818.com (hereinafter referred to as the "Website") and the associated mobile and tablet applications ("Applications") operated by 1818 Auskunft AG (registered in the commercial register under number CHE-108.741.810 and with its registered office at Speicherstrasse 27, 9053 Teufen AR, Switzerland) (the "Company").
- 1.2 This privacy policy is on 1818.com on our website. We assume no responsibility and disclaim any liability for links from our website to third-party websites. Clicking on an external link is entirely at your own risk.
- 1.3 The Company is part of the kgb group of companies (the "Group").
- 1.4 The purpose of this charter ("the Charter") is to inform users about how the Company:
  - collects personal data;
  - Consults and stores information about the user's use of the website, which may be recorded in "cookie" files (hereinafter, "cookies").
- 1.5 Please note that **by visiting and using our website, you give your consent to the processing of your personal data** within the framework of this statement and the applicable data protection law.
- 1.6 The Privacy Policy may be modified, supplemented or updated by the Company at any time, in particular to comply with any regulatory, legal, editorial or technical developments. Users will be informed of the changes on our website. Changes to this Privacy Policy will be effective from the time they are published on our website. The processing of personal data collected under an older privacy policy is carried out in accordance with this privacy policy.
- 1.7 The Charter describes the methods used by the Company on its website and applications to collect, process and store personal data (hereinafter "Personal Data") of visitors and users during their use and navigation on the Website, in accordance with the legal provisions relating to personal data.

## 2. CONTACT

- 2.1 If you have any questions or communications regarding your personal data, please do not hesitate to contact us. You can reach us as follows:

1818 Auskunft AG  
Speicherstrasse 27  
9053 Teufen  
Switzerland  
infos@1818.com

### **3. SPECIFICS REGARDING CERTAIN CATEGORIES OF PERSONAL DATA**

3.1 In the use of the Website and Applications by the User, data may be collected, directly or indirectly, by the Company in order to allow access to the services of the Website and Applications (hereinafter, the "Services") for administrative and commercial management purposes.

### **4. PROCESSING OF PERSONAL DATA**

4.1 We collect the following information as part of your online visit:

- a) IP address;
- b) Browser version and browser type used;
- c) Date & time of the visit or request.

4.2 Unless further processing is explicitly mentioned in this privacy policy, the aforementioned list is exhaustive. It is also possible that we do not collect all of the data mentioned.

4.3 We do not create personality profiles on the website and do not collect or process any particularly sensitive personal data (e.g. about religious, political or ideological views, state of health, etc.). We reserve the right to use your personal data in the context of a credit check, which we carry out or can have carried out in the context of contract processing.

### **5. USE OF PERSONAL DATA**

5.1 Most of the services offered by the company do not require registration, so the user can visit the website without providing any personal information.

5.2 The processing of your personal data on the website takes place exclusively in the factual context of an enquiry or order placed by you, for the purpose of correcting errors or improving our website and, if necessary, for internal statistical purposes.

5.3 We use your data for the following purposes:

- To provide the services and applications of the Website;
- To communicate with you (by email, telephone or SMS), including to provide you with information about products or services and special offers through the Website and Applications;
- To evaluate and improve the interest generated by our products, our services, the Website and the Applications;
- To comply with our legal and regulatory obligations, such as:
  - Prohibit potentially prohibited or illegal activities;
  - Monitor and analyze the use of the Site and Applications to detect, prevent, investigate, prosecute and/or report fraud, terrorism, deception, security breaches, or criminal offenses.
  - To manage, update, consolidate, improve, and monitor the accuracy of our records and activities, and in particular to ensure compliance with legal, regulatory, and compliance requirements and operating rules (e.g., explaining regulatory requirements and keeping records);
- Gathering management information to perform statistical, modeling, and trend analysis, and to further develop and improve our products and services.

We do not collect, use or store the user's personal data unless it is strictly necessary for the purposes described above.

- 5.4 With regards to our 1818 Directory Enquires telephone service, we only record your call for quality and internal training purposes. Information provided from you by e-mailing our Customer Care email address or calling our Customer Care phone number will be collected for refund processing and documentation purposes only.

## **6. TRANSFER OF PERSONAL DATA**

6.1 The User's personal data is never sold by the Company to third parties.

6.2 Your data will not be passed on to third parties without your explicit consent. Exceptions to this are the following cases in which the user's personal data is disclosed:

- To authorized personnel of the Company who act strictly within the scope of their duties;
- To authorized host providers for connectivity and security purposes, to the extent strictly necessary (basically your IP address);
- To our subcontractors (data processors) who, acting on the instructions of the Company, carry out specific processing in accordance with the purposes for which they were initially engaged in accordance with the provisions on personal data, in the context of activities such as delivery services, evaluation of the usefulness of the website, marketing and product marketing, data management or technical support. These subcontractors are contractually obligated to use the User's personal data only for the agreed purposes and not to sell or transfer them to third parties, unless required by law, expressly authorized by the Company or a corresponding provision made in this Charter;
- to our service partners that we need to process the contractual relationship (e.g. financial institutions to process payments, the postal service, courier services or freight forwarders to ship materials or vehicles, tools to provide our services in the areas of accounting, listing management or general order management, etc.). In these cases, we strictly observe the requirements of the applicable data protection laws. The scope of data transfer is limited to a minimum.

## **7. STORAGE PERIOD AND ARCHIVING OF PERSONAL DATA**

7.1 The retention of data is only carried out in order to comply with our legal and/or regulatory obligations.

## **8. RIGHTS OF ACCESS, RECTIFICATION, LIMITATION, DELETION, OPPOSITION AND PORTABILITY**

8.1 The User has a right of access, rectification and deletion of personal data concerning him/her, as well as a right to portability of the personal data provided by the User, a right to limitation and a right to object to the processing of his/her personal data for reasons arising from his/her particular situation, subject to the conditions provided for in the Personal Data Regulation for the exercise of these rights. The user also has the right to issue instructions regarding the fate of his or her personal data after his or her death.

- 8.2 In the event of acquisition, including by electronic means, the Company will provide the User with the means that allow him to object at any time to the receipt of information or to consent to it in advance, in accordance with the provisions on personal data. In the case of processing that requires the user's consent, the user also has the right to withdraw his consent at any time.
- 8.3 If the User wishes to know how the Company uses their personal data or wishes to exercise their rights, they may contact the Company in writing at the following address: 1818 Auskunft AG – Protection of Personal Data – Speicherstraße 27, 9053 Teufen AR or by e-mail e-mail to [infos@1818.com](mailto:infos@1818.com). In this case, the User must provide the personal data that he/she requests from the Company to rectify, update or delete by accurately identifying himself with a document proving his/her identity. Requests for deletion of personal data are subject to the Company's legal obligations, in particular with regard to the storage or archiving of documents. A response will be sent within one month of receipt of the request.
- 8.4 If a contractual relationship is still pending at the time of receipt of your revocation and deletion request, your personal data will continue to be processed until the contract has been fully processed. Your revocation under data protection law expressly has no influence on the processing of existing contractual relationships and is not considered an extraordinary reason for termination.

## **9. SECURITY AND CONFIDENTIALITY**

- 9.1 Our website is hosted by Amazon.com, Inc.

The user's personal data collected in the course of the activities on the website is hosted on the servers of Amazon Content Delivery Network which is global. The platform is shielded as much as possible against unauthorized access. No back ups of personal data are made.

- 9.2 As far as your personal data is concerned, Amazon collects the data when viewing the website. The data is stored in Amazon's Web Application Firewall (WAF) and is purely used for the technical wellbeing of the website. The platform is shielded as much as possible against unauthorized access. No backups are made
- 9.3 When processing the User's personal data , the Company takes all reasonable measures to protect it from loss, misuse, unauthorized access, disclosure, alteration or destruction.

## **10. COOKIES AND TAGS**

- 10.1 The company does not use cookies and tags.

## **11. CHILD PROTECTION**

- 11.1 As stated in the General Terms and Conditions of Use of the Services, the Websites and the services available on the Websites and Applications are intended for adults only.
- 11.2 It is impossible for the company to detect that a minor has accessed the websites and behaved like a user. The Company will not collect, use or disclose the personal information provided by a minor without first obtaining the consent of the legal guardian

(parent or guardian) and the minor in question via direct offline contact. In the event that the Company becomes aware that a minor has used the Sites, the Company will inform such person as soon as possible (i) of the specific categories of personal information collected from the minor and (ii) of the possibility of objecting to its collection, use or retention.

11.3 The company scrupulously respects the laws for the protection of children.