

PROTECTION OF PERSONAL DATA

FROM THE SITE 1818.COM

APPLICABLE FROM SEPTEMBER 1, 2020

1. PREAMBLE

1.1. The 1818.com website (hereinafter the “**Site**”) and the related mobile and tablet applications (Applications) are operated by the company 1818 Auskunft AG (registered in the Companies Register under number CHE-108.741.810 and whose headquarters is located at Speicherstrasse 27, 9053 Teufen AR, Switzerland) (the “**Company**”).

The Company is part of the kgb group of companies (the “**Group**”).

1.2. The Company respects in particular (i) the Federal Data Protection Law (LPD) of June 19, 1999 and (ii) any other future applicable legislation which would supplement or replace them (hereinafter together “**Regulation relating to personal data**”).

1.3. The purpose of this charter (“the Charter”) is to inform Users of the manner in which the Company:

- collects personal data;
- consults and stores information relating to the User's navigation on the Site which may be recorded in “cookie” files (hereinafter the “**Cookies**”).

1.4. The Charter may be modified, supplemented or updated at any time by the Company, in particular in order to comply with any regulatory, jurisprudential, editorial or technical developments. The User must refer to the latest version of the Charter before any navigation.

1.5. The Charter describes the methods that the Company uses through the Site and its Applications to collect, process and store personal data (hereinafter the “**Personal Data**”) of visitors and Users during their use and navigation on the Sites in accordance with the provisions of the Regulations relating to personal data.

2. SPECIFICITIES RELATED TO CERTAIN CATEGORIES OF PERSONAL DATA

2.1 When using the Site and Applications by the User, data may be collected directly or indirectly by the Company and processed in order to allow access to the services of the Site and Applications (hereinafter the “**Services**”) for administrative and commercial management purposes.

3. USE OF PERSONAL DATA

3.1. Most of the services offered by the Company do not require registration, allowing the User to visit the Sites without having to identify themselves.

3.2. We use your data for the following purposes:

- Creation and registration of your account necessary for access and use of the services offered by the Site and the Applications;
- Offer the services of the Site and Applications;
- To communicate with you (by email, telephone or SMS), including providing you with information regarding the Site and Applications, products or services and special offers;

- To evaluate the interest generated by our products, our services, the Site and the Applications and to improve them;
- To inform you about special offers as well as products or services provided by other companies in the Group or by our partners which may interest you;

In order to fulfill our legal and regulatory obligations such as:

- Prohibit potentially prohibited or illegal activities;
- Monitor and analyze the use of the Site and Applications in order to detect, prevent, investigate, pursue and/or report any act of fraud, terrorism, deception, security breach or crime.
- To administer, 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 (such as regulatory requirements declaration and record keeping);
- Gather management information in order to carry out statistical, modeling and trend analyses, in order to develop and improve our products and services.

The User's Personal Data is not collected, used or stored by us unless it is strictly necessary for the purposes described above.

4. COMMUNICATION OF PERSONAL DATA

4.1 The User's Personal Data is never sold to third parties by the Company.

4.2 The User's Personal Data that the Company collects is only communicated in the following cases:

- To authorized personnel of the Company acting strictly within the framework of their missions;
- To our subcontractors acting on instructions from the Company in the context of specific processing in accordance with the purposes for which they were initially collected in accordance with the Regulations relating to personal data, in the context of activities such as supply services, evaluation of the usefulness of the Site, marketing and product marketing, data management or technical support. These subcontractors are contractually bound to use the User's Personal Data only for the agreed purposes, and not to sell or disclose them to third parties, unless required by legislation, or if the Company explicitly authorizes it, or if a provision is made to this effect in this Charter;

5. STORAGE DURATION AND ARCHIVING OF PERSONAL DATA

Certain data is kept in archives to meet our legal and/or regulatory obligations.

Cookies placed by the Site on your terminal last for 90 days.

6. RIGHT OF ACCESS, RECTIFICATION, LIMITATION, DELETION, OPPOSITION AND PORTABILITY

6.1 The User has a right of access, rectification and deletion of Personal Data concerning him as well as a right to portability of the Personal Data that the User has provided, a right to limitation, and a right to object to the processing of their Personal Data for reasons relating to their particular situation, subject to the conditions provided for by the Regulations relating to personal data for the exercise of these rights. The User also has the right to define directives relating to the fate of his Personal Data after his death.

- 6.2 In the event of prospecting, including by electronic means, the Company will provide the User with the means enabling them to object at any time to receiving information or to consent to it in advance, in accordance with the Regulations relating to personal data. For processing requiring the User's consent, they also have the right to withdraw their consent at any time.
- 6.3 If the User wishes to know how the Company uses their Personal Data, or to exercise their rights, the User can contact the Company in writing at the following address: 1818 Auskunft AG - Protection of Personal Data - Speicherstrasse 27, 9053 Teufen AR or by email at infos@1818.com.
- 6.4 In this case, the User must indicate the Personal Data that he would like the Company to correct, update or delete, by identifying himself precisely with an element to justify his identity. Requests for deletion of Personal Data will be subject to the obligations imposed on the Company by legislation, in particular with regard to the conservation or archiving of documents. A response will be sent within one month of receipt of the request.

7. SECURITY AND CONFIDENTIALITY

- 7.1 To ensure the security and confidentiality of the Personal Data that the Company collects online, the Company uses infrastructures protected by encryption, firewalls and information access control devices. When processing the User's Personal Data, the Company takes all reasonable measures to protect them against any loss, misuse, unauthorized access, disclosure, alteration or destruction.

8. COOKIES AND TAGS

- 8.1 A "cookie" is a small information file sent to the User's browser and stored on the User's terminal (e.g. computer, smartphone), (hereinafter "Cookies"). This file includes information such as the User's domain name, the User's Internet service provider, the User's operating system, and the date and time of access. Cookies are in no way likely to damage the User's terminal. The different cookies set up by the Service are detailed here.
- 8.2 The Company may collect and process the User's information concerning their visit to the Site such as the pages consulted, the searches carried out, the website visited just before this one or even the choices of service or personalization of the User. This information allows the Company to improve the content of the Site, the User's navigation and/or to compile statistics on people using the Site for internal market research purposes or to provide the User a service that he has requested (audience measurement cookies and personalization cookies). The Company may use external service providers to help it collect and process the information described in this section.

The Site also allows the Company's partners to place cookies to provide Users with advertising tailored to their preferences and interests.

- 8.3 The User can configure their browser software to accept or refuse certain categories of Cookies. If the User refuses the recording of Cookies in his terminal or browser, or if he deletes those saved there, navigation and the service provided by the Site may be limited. In this case, the Company declines all responsibility for the consequences linked to the degraded functioning of the Sites and the services possibly offered by the Company, resulting from (i) the refusal of Cookies by the User (ii) the impossibility for the Company to save or consult the Cookies necessary for their operation due to the User's choice.

- 8.4 The Company uses the following cookies and tags:

The Company may also use Internet beacons (also known as "tags", or action tags, single-pixel GIFs, transparent GIFs, invisible GIFs and one-to-one GIFs) and deploy them through a partner advertising network. or a partner specializing in web analytics (such as Google Analytics, etc.) who may be located (and therefore store the corresponding information,

including the User's IP address) in a foreign country. These tags are placed both in online advertisements allowing Internet users to access the Sites, and on the various pages thereof. This technology allows the Company to evaluate visitors' responses to the Sites and the effectiveness of its actions (e.g. the number of times a page is opened and the information consulted), as well as the use of these Sites by the User. The external service provider (advertising agency or Web analyst) may possibly collect information on visitors to the Sites and other Internet sites using these tags, compile reports on the activity of the Sites for the attention of the Company, and provide other services relating to the use of this and the Internet. He may be required to communicate this information to other third parties if the law obliges him to do so, or if he uses other service providers to process the information on his behalf.

9. CHILD PROTECTION

- 9.1 As specified in the General Conditions of Use of the Services, the Sites and the Services available on the Sites and the Applications are intended only for adults.
- 9.2 It is impossible for the Company to realize that a minor has entered the Sites and behaved like a User. The Company will not collect, use or disclose Personal Data communicated by a minor, without obtaining the prior consent of their legal guardian (parent or guardian) and the minor concerned via direct offline contact. In the event that the Company becomes aware that a minor has used the Sites, the Company will inform this person as soon as possible (i) of the specific categories of Personal Data collected from the minor, and (ii) of the possibility of objecting to the collection, use or conservation of these.
- 9.3 The Company scrupulously respects child protection laws.