

## General

Data protection is a matter of trust – and your trust is important to us. Swisscom is strongly committed to the handling of personal data in a responsible and legally compliant manner. This data protection notice describes the ways in which we process your personal data.

## Applicability

This data protection notice applies to our processing of personal data within the scope of the European Union's General Data Protection Regulation (GDPR). Other terms of use or privacy policies may apply in addition.

## Categories of personal data

In connection with your use of our products and services, we process different categories of your personal data, such as:

- Contact and identification data
- Personal details
- Financial data – Contract data
- Telecommunication data
- Interaction and usage data
- Website information

Further details on the categories of personal data processed by us can be found under item 1 in the detailed notice below.

In general, you are under no legal or contractual obligation to disclose personal data. Nevertheless, we have to collect and process personal data that is required to establish and maintain a contractual relationship. Without this data, we are not able to conclude or continue the related contract. In addition, it is not possible to avoid processing of certain data when you use our websites. The logging of certain data (but not usually personal data) cannot be prevented for technical reasons.

Under certain circumstances, you may want or need to send us the personal data of third parties. In such cases, you are obliged to make the person concerned aware of this data protection notice and to ensure that their personal data is correct.

## Reasons for data processing

We process your personal data for purposes such as:

- Execution of orders and contracts
- Credit checks
- Provision of services
- Customer support
- Product marketing
- Further development of our services
- Misuse measures
- Compliance with legal requirements and assertion of claims

Further details on the reasons for processing data can be found under item 2 in the detailed notice below.

## Legal grounds for data processing

The processing of personal data requires a legal basis. The processing of your personal data is generally based on one or more of the following legal grounds: Processing is necessary (i) to execute a contract with you or to process your contract request (Art. 6 (1) (b) GDPR; 'performance of contract'), (ii) to comply with a legal obligation (Art. 6 (1) (c) GDPR; 'legal obligation'), or (iii) to pursue a legitimate interest (Art. 6 (1) (f) GDPR; 'legitimate interest'). Further details about the legal grounds on which we process your personal data can be found under item 3 in the detailed notice below.

## Categories of data recipients and cross-border processing

Provided that we meet the legal requirements, we can make your data available to recipients such as service providers within and outside the Swisscom Group and to other third parties, such as business partners, contractors or public authorities. Some of these recipients are located outside the jurisdiction of the EU/EEA member states. Further details on the transfer of personal data to third parties and cross-border processing can be found under item 4 in the detailed notice below.

## Storage duration and data deletion

Your personal data will be stored at least until it has fulfilled its intended purpose, following which it will be deleted or anonymised. Further details on storage duration and data deletion can be found under item 5 in the detailed notice below.

## Your rights

You have several rights in connection with the processing of your personal data under the conditions prescribed by the applicable laws, such as the right to access, correction or deletion. Further details of your rights can be found under item 6 in the detailed notice below.

## Amendments

This data protection notice is not a component of the General Terms & Conditions (GTC). We reserve the right to change or supplement all parts of this notice at any

time and at our sole discretion. We will inform you of any such changes in accordance with the requirements of the applicable law.

## Contact

If you have any questions or suggestions, you can contact us as follows:

- Via contact form: <https://www.swisscom.ch/en/residential/help/contact.html>
- By phone: +41 800 800 800
- By post: Swisscom (Switzerland) AG, Contact Center, 3050 Bern

If you use Wingo, M-Budget or Coop Mobile products or services, you can contact us as follows:

### For M-Budget:

- Via contact form: <https://shop.m-budget.migros.ch/de/contacts>
- By phone: +41 800 151 728
- By post: M-Budget, Contact Center, CH-3050 Bern

### For Wingo:

- Via contact form: <https://www.wingo.ch/de/kontakt>
- By phone: +41 900 94 93 92 (CHF 1.50/min. for first 10 minutes, then each subsequent minute free of charge; charges may be higher if calling from abroad)
- By post: Wingo, Contact Center, 3050 Bern

### For Coop Mobile:

- Via contact form: <https://www.coopmobile.ch/de/kontakt>
- By phone: +41 800 746 746
- By post: Coop Mobile, Contact Center, 3050 Bern

You can contact the Data Protection Officer of Swisscom Ltd and Swisscom (Switzerland) Ltd as follows:

- By email: [datenschutz@swisscom.com](mailto:datenschutz@swisscom.com)
- By post: Swisscom (Switzerland) Ltd, Dr. Nicolas Passadelis, LL.M., Datenschutzbeauftragter Swisscom AG and Swisscom (Switzerland) Ltd, PO Box, 3050 Bern

Our data protection representative in the European Union can be contacted by supervisory authorities and data subjects in all issues related to EU data protection law as follows:

- By email: [info@datenschutzpartner.eu](mailto:info@datenschutzpartner.eu)
- By post: VGS Datenschutzpartner UG, Am Kaiserkai 69, 20457 Hamburg, Germany

## DETAILED NOTICE

### 1. Categories of personal data

The personal data processed by us includes:

- **Contact and identification data** such as surname, first name, title, address, email address, telephone number, customer number, copy and number of official ID.
- **Personal details** such as age, gender, nationality, place of birth, residency status, marital status, language, family details.
- **User account information** such as user name, password, user account number.
- **Financial data:** Account information, payment information, payment history, average spend, credit reference data, income, purchasing power.
- **Contract data** such as contract type and content, types of products and services, applicable business terms, contract start date and duration, billing data, itemised billing, service restrictions.
- **Marginal telecommunication data** such as telephone number, value-added service numbers, connection time, date and duration, type of connection, location data, IP address, device identification numbers including IMEI, IMSI, MAC address.
- **Interaction and usage data:** Correspondence, chat content, voice recordings, customer service information, customer preferences, customer segment and target-group information, device type, device settings, operating system, software, details relating to asserted rights, feedback.
- **Website information:** Web page, IP address, cookie information, browser settings, frequency and duration of page visits, search terms, shopping cart contents, clicks on content, referring page/site.

### 2. Reasons for data processing

We process your personal data for the following purposes:

- **Execution of orders and contracts:** In particular, this includes maintenance of a customer database, management of customer relationships, invoicing, verification of your details, customer communications, provision and performance of services, and operation of our technical infrastructure.
- **Credit checks:** Determination of the creditworthiness of our customers, in order that our employees can check service restrictions or special payment terms in individual cases.
- **Debt collection:** In particular, this includes assertion of claims and legal enforcement of outstanding receivables.

- **Performance quality:** In particular, this includes measures to ensure service quality and security, planning and control of server and network capacities, and technical fault diagnosis and troubleshooting.
- **Customer support:** In particular, this includes response to questions and concerns, provision of technical support and general customer support tasks.
- **Marketing:** Provision of advertising material and offers for our products and services (general and tailored to your customer segment and customer profile).
- **Further development of our services:** In particular, this includes the evaluation, improvement and development of new products, services, functions and customer interfaces; quality control and improvement of customer support; analysis and assessment of the use of our webpages and mobile apps to make them more user-friendly; statistical analysis of customer behaviour on the basis of anonymised customer data.
- **Misuse measures:** In particular, this includes detection, prevention and elimination of misuse of our products, services or infrastructure.
- **Compliance with legal requirements:** In particular, this includes compliance with the applicable laws and provisions, response to requests by the competent courts and authorities, and the assertion, exercise or defence of legal claims.

### 3. Legal grounds for data processing

Swisscom processes personal data on the following legal grounds. The legitimate interests behind data processing (on the basis of Art. 6 (1) (f) GDPR) are included in the table.

Reason for processing	Data categories	Legal grounds for processing
Execution of orders and contracts	<ul style="list-style-type: none"> <li>– Contact and identification data</li> <li>– Personal details</li> <li>– User account information</li> <li>– Financial data – Contract data</li> <li>– Telecommunication data</li> <li>– Interaction and usage data</li> <li>– Website information</li> </ul>	Performance of contract
Credit checks	<ul style="list-style-type: none"> <li>– Contact and identification data</li> <li>– Financial data</li> <li>– Contract data</li> </ul>	Legitimate interest in reduction of losses due to unpaid invoices.
Debt collection	<ul style="list-style-type: none"> <li>– Contact and identification data</li> <li>– Personal details</li> <li>– Financial data</li> <li>– Contract data</li> </ul>	Legitimate interest in collection of outstanding payments and compliance with Swiss legal provisions.
Performance quality	<ul style="list-style-type: none"> <li>– Contact and identification data</li> <li>– User account information</li> <li>– Contract data</li> <li>– Telecommunication data</li> <li>– Interaction and usage data</li> <li>– Website information</li> </ul>	Legitimate interest in customer satisfaction, competitiveness and compliance with Swiss legal provisions.
Customer support	<ul style="list-style-type: none"> <li>– Contact and identification data</li> <li>– User account information</li> <li>– Personal details</li> <li>– Financial data – Contract data</li> <li>– Telecommunication data</li> <li>– Interaction and usage data</li> <li>– Website information</li> <li>– Audio and video recordings</li> </ul>	Legitimate interest in customer satisfaction, competitiveness and compliance with Swiss legal provisions.
Marketing	<ul style="list-style-type: none"> <li>– Contact and identification data</li> <li>– Personal details</li> <li>– Financial data – Contract data</li> <li>– Interaction and usage data</li> <li>– Website information</li> </ul>	Legitimate interest in implementation of marketing measures.

Further development of our services	<ul style="list-style-type: none"> <li>– Contact and identification data</li> <li>– Personal details</li> <li>– Contract data</li> <li>– Telecommunication data</li> <li>– Interaction and usage data</li> <li>– Website information</li> </ul>	Legitimate interest in customer satisfaction and competitiveness.
Misuse measures	<ul style="list-style-type: none"> <li>– Contact and identification data</li> <li>– Personal details – Financial data – Contract data</li> <li>– Interaction and usage data</li> </ul>	Legitimate interest in avoidance of damage/loss and compliance with Swiss legal provisions
Compliance with legal requirements	<ul style="list-style-type: none"> <li>– Contact and identification data</li> <li>– Personal details – Financial data – Contract data</li> <li>– Telecommunication data</li> <li>– Interaction and usage data</li> <li>– Website information</li> </ul>	Legal obligation and legitimate interest in compliance with Swiss legal provisions.

### 4. Categories of data recipients and cross-border processing

#### 4.1. Categories of data recipients

Third parties within the context of compliance with legal obligations: We may share your personal data with third parties where deemed necessary or appropriate to comply with (or to check compliance with) applicable laws and provisions, or for the purpose of responding to requests from the relevant authorities.

**Service providers (within and outside the Swisscom Group):** Service providers that we assign as part of our business operations to perform customer or IT-related tasks under a contractual relationship, such as product manufacturers and suppliers, providers of maintenance and support services, and distribution partners.

**Providers of value-added and supplementary services:** If you purchase value-added or supplementary services via Swisscom's network, we may provide third-party suppliers with any data required for performance of the service or for debt collection.

**Debt collection service providers:** We may process your personal data for the purpose of instructing debt collection service providers and may make it available to them.

**Third parties within the context of misuse measures:** We may share personal data with third parties or obtain it from third parties in the context of signs of unlawful use, provided that it is suitable for the detection, prevention or elimination of fraudulent or improper use of Swisscom or third-party services.

**Other Group companies:** We may share your personal data inside the Swisscom Group for internal administrative purposes in accordance with our legitimate interests. 4.2. Cross-border processing in countries outside the EEA ('third countries')

The recipients of your personal data may also be based abroad – including outside the European Economic Area ('EEA', which comprises the EU member states and the EFTA states with the exception of Switzerland). The countries concerned may not have laws in place that protect your personal data to the same extent as in Switzerland or the EU/EEA. If we transfer data to such a country, we take appropriate measures to protect your personal data, such as concluding data transfer agreements based on 'standard contract clauses'; i.e. contracts approved, drawn up or recognised by the European Commission (Art. 46 (2) GDPR). An example of a contract commonly used can be found at [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en). Please contact us if you would like to receive a copy of our data transfer agreements.

In exceptional cases, data may be transferred to countries without adequate protection; e.g. if explicit consent has been granted (Art. 49 (1) (lit. a) GDPR), to execute a contract with the person concerned, or to process your contract request (lit. b), to conclude or execute a contract with someone else in the interest of the person concerned (lit. c), or to establish, exercise or defend legal rights (lit. e).

#### 5. Retention periods and deletion of data

We store and process your personal data for as long as is necessary to fulfil the purpose of its collection, or for as long as required or permitted by law. For example, we have a legitimate interest in storage of your personal data for as long as it is subject to retention requirements or storage for evidence or security purposes. Thereafter, your personal data will be deleted from our systems or anonymised, in order that you are no longer identifiable.

## 6. Rights of the persons concerned

As part of the GDPR, you have the following rights in relation to your personal data:

6.1. **Access:** You have the right to ask us for confirmation of whether we process any personal data belonging to you and, if so, specific details thereof. In particular, this information includes the purpose of the processing, details of the categories of personal data, and the recipients or categories of recipients to which the personal data has been or will be made available.

6.2. **Correction:** You have the right to have the personal data that we process corrected and/or completed.

6.3. **Deletion:** Provided that we are under no legal or official obligation to retain it, you have the right to have your personal data deleted if: it is no longer needed for the intended purposes; you have withdrawn your consent and there is no other legal basis for processing; you have effectively objected to the processing (see below); it has been processed unlawfully.

6.4. **Restricted processing:** You may demand that we restrict the processing of your personal data in the following cases:  
If you dispute the accuracy of the data for the duration of our checks and the subsequent correction (or refusal of correction).  
If the data has been processed unlawfully and you wish to have the processing restricted rather than the data deleted.  
If, after fulfilment of the purpose, you request that the data should not be deleted, but kept for the purpose of assertion of further rights.

The personal data in question will be segregated or marked accordingly for the duration of the restriction. Any further use of the data in addition to storage requires your explicit consent.

6.5. **Data portability:** Under certain circumstances, you have the right to receive the personal data provided by you in a structured, commonly used and machine-

readable format. You are also entitled to have this personal data sent to another company without restrictions, if technically feasible.

6.6. **Right to object:** Depending on your specific situation, you are entitled at any time to object to the processing of your personal data, and you may ask us to stop processing your personal data. If you have a right to object and you exercise it, your personal data will no longer be processed by us for such purposes.

In particular, you will have no right to object if we have compelling legitimate reasons for processing the data that outweigh your interests, rights and freedoms, or if the data is processed for the purpose of asserting, exercising or defending legal rights, or if it necessary for the conclusion or performance of a contract.

**You have the right to object at any time to processing of your data for direct marketing purposes. After you have objected, your personal data will no longer be used for the purpose of direct marketing.**

6.7. **Withdrawal of consent:** You have the right to withdraw your consent to processing of your personal data for one or more specific purposes. This will not affect the legitimacy of any processing that took place before withdrawal of your consent.

You may assert your rights relating to the processing of your personal data at any customer contact point. If you wish to object to use of your personal data for direct marketing purposes, you can also visit the following URLs:

- Swisscom: <https://www.swisscom.ch/data-usage>
- M-Budget: <https://shop.m-budget.migros.ch/de/mein-konto>
- Wingo: <https://mywingo.wingo.ch>
- Coop Mobile: <https://www.coopmobile.ch/de/mein-konto>

You also have the right to file a complaint with the relevant supervisory authority, in particular in the member country where you are ordinarily resident or where the suspected breach has taken place, if you believe that your personal data has been processed in violation of the GDPR.