



Data protection at Swisscom

Clear. Transparent. Precise.

swisscom

Table of contents

What data we use, how and what for

	Contract and master data.....	3
	Usage and connection data.....	7
	Technical data.....	11
	Financial data.....	14
	Location data	17
	Interaction and image data.....	19

What applies to all data types

	Place of processing	22
	Duration of processing	23
	Protection of your data	24
	Your settings and rights.....	25
	Legal basis and right to lodge a complaint	26
	Contact	27

What kind of data is involved?

Personal details

such as date of birth, gender, nationality, language, marital status and, where relevant for the contract, information on family members and related persons

Contact and identification data

such as name, title, address, email address, telephone number, customer number and copy and number of official photographic identification; login data such as username and password

Notices to Swisscom

such as content and data exchanged when contacting us or noted down by our consultants or which you provide to us in customer surveys

Contract data

such as the type, start date, term and content of the contract

Purpose of processing

Contract performance and execution

We use your data to ensure the conclusion, performance, termination, renewal and enforcement of your contracts, to invoice services and to detect, prevent and eliminate misuse of our products, services or infrastructure.

In particular, we use

- **error messages** received from you to identify and correct problems and product defects.
- the content of your **communications** to assign specialist advisors to you in case of enquiries.
- your **contract data** to adapt or cancel subscribed services.
- your **contact details** to send you an invoice.
- your **login data** to identify you when you use our online services, such as My Swisscom.

If you have recently moved house, we will provide your name at your previous home address to the next tenant, other providers of fixed network connections and their distribution partners. This means that it will be faster, simpler and cheaper to connect the next tenant. You can change your settings in My Swisscom at any time at <https://www.swisscom.ch/myswisscom/myprofile/privacy-settings/information-for-subsequent-tenants>.

Third-party services

We use your data to enable you to purchase third-party services via your Swisscom bill or prepaid balance.

In particular, we use

- your **surname, first name, postal** and **e-mail address** if you subscribe to a Canal+ offer via Swisscom blue TV.
- your **mobile phone number** and billing **contact details** if you purchase value-added SMS services, such as fee-based severe weather warnings.
- your **mobile or landline number** and billing **contact details** if you call a 090x number.
- your **mobile phone number** or your **billing address** if you purchase products and services such as apps and tickets from third parties (e.g. from an online store) and pay for them with Swisscom Pay.

Product development and improvement

We use your information to improve, develop or expand our services, products, their usability and our support for them.

In particular, we use

- your **communications** in surveys to identify the needs of our customers for adaptations or further developments to our products.
- the **content** of consultations to understand our customers' interest in new services.

Fulfilment of legal obligations

We use your data to comply with our legal obligations (e.g. under telecommunications law).

In particular, we collect

- your **personal information** (name, address, date of birth, nationality, copy of ID card) if you receive a mobile phone service, in order to comply with our statutory disclosure obligations upon a corresponding official request.
- the **date of birth** of primary users of a mobile telephone line under the age of 16 if you, as a parent, have concluded the contract with us.

Offers from Swisscom

We use your data to provide you with general offers on our services and products or offers that are tailored to you based on the compilation and evaluation of your data ("profiling").

In particular, we use

- your **e-mail address** to send you newsletters and offers, e.g. from the blue product range.
- the **term** of your contract to make you a renewal offer.
- the **content** of consultations or **queries** noted in connection with them, in order to provide you with customised offers.
- your **place of residence** to inform you about the opening of a Swisscom shop near you or the expansion of our broadband network.

To the settings:

swisscom.ch/myswisscom-swisscomangebote

To the settings for Wingo, Coop Mobile, M-Budget Mobile:

mywingo.wingo.ch // myaccount.coopmobile.ch // selfcare.m-budget.migros.ch

Swisscom offers on third-party platforms

We also book advertising for our own offers on social networks such as Instagram/Facebook (Meta) and via other platforms such as Google ("advertising platforms" or "platform"). With the help of customer data, we can show our customers Swisscom offers that are more relevant to them. For this purpose, we upload data (in particular e-mail address and mobile number) of customers we wish to address in encrypted form (so-called "hashing" via SHA-256) to the Swisscom account of the relevant advertising platform. Within this account, a comparison is made with the likewise encrypted customer data of the platform, whereby the platform operator can only check which encrypted entries ("hashes") match. The data is not decrypted during this process. All entries for which no match is found are removed from the Swisscom target group. This subsequently allows us to display our offers on the websites and in the app of the platform in question and on the websites of platform partners (e.g. Google adverts on a third-party website) in a more targeted manner. After the aforementioned data synchronisation, the initial data is deleted.

In particular, we use

- Your **mobile number** in order to restrict advertising for a new internet subscription to existing Swisscom mobile subscription customers and to show you a special price that takes your existing mobile subscription into account.
- Your **e-mail address** in order to tailor an offer to your needs or your individual subscription constellation and thus show you advertising that is more relevant to you. Like this you will see fewer advertisements for products that you have already purchased.

To the settings:swisscom.ch/myswisscom-swisscomangebote

This data transfer does not currently take place at Wingo, Coop Mobile and M-Budget.

Origin of the data

You provide us with data

if, for example, you take part in a competition or customer surveys, register for a Swisscom login or provide us with a copy of your ID for identification purposes.

We collect data about you

if, for example, we record a ticket for your fault report or change your language in our Customer Center.

Third parties provide us with your data

- if we supplement your existing data with information from address providers regarding your address, date of birth or household size.
- if we receive your contact data from Swisscom Group companies with which you have a contract or are otherwise in contact.

Recipients of the data

Swisscom Group companies

- that are engaged as contractors for the provision of our services, the provision and maintenance of our products, as well as distribution and marketing.
- that receive your data and use it on their own responsibility or in shared responsibility with us.
- from which you obtain additional services through us.

Examples:

- The Swisscom Group company “**cablex Ltd**” receives your address to remedy a fault in your home installation.
- The Swisscom Group companies “**Swisscom DevOps Center B.V.**” and “**Swisscom DevOps Latvia SIA**” may view applications containing contact details and other information about you when providing development and operational services.
- The Swisscom Group company “**Swisscom Directories Ltd**” will receive your contact details and telephone number if you wish to be entered in the telephone directory.
- If you use services of the Swisscom Group company “**blue Entertainment Ltd**” (“blue+”) (e.g. films and sports events on a pay-per-view basis, blue+ subscriptions), blue+ receives your email address and contract data such as blue TV subscription type, start and end dates of the blue TV subscription and cancellation status to send you relevant news or offers regarding blue+ services. You can choose your corresponding settings.

To the settings:swisscom.ch/myswisscom-swisscomangebote**To the settings for Wingo, Coop Mobile, M-Budget Mobile:**mywingo.wingo.ch // myaccount.coopmobile.ch // selfcare.m-budget.migros.ch**Authorities**

Offices, courts and other authorities with criminal, police, regulatory, judicial, register or informational functions.

Examples:

- In the event of a court or administrative order based on a corresponding legal decree (law, regulation), we must disclose your personal details as well as contact, identification and contract data to the **competent authority**.
- The **Federal Statistical Office** maintains a register of samples as an auxiliary instrument for surveys of households and

persons. We must provide the Federal Statistical Office with the necessary customer data for this purpose.

Service providers, distribution partners and other third parties

Companies outside the Swisscom Group

- that are engaged as contractors for the provision of our services, the provision and maintenance of our products, as well as distribution and marketing.
- that receive your data and use it on their own responsibility or in shared responsibility with us.
- from which you obtain additional services through us.
- with which Swisscom exchanges information regarding the fraudulent or abusive use of telecommunications services with the intention of detecting, preventing or eliminating such use.

Examples:

- If you take out a Swisscom subscription with a **sales partner** (e.g. Mobilezone), it will record your contact details and other contract and customer account information in Swisscom's customer database.
- If you would like to conclude or amend a contract with Swisscom, we can transmit your first name and surname, your date of birth and your address to **companies specialising in credit checks**, such as e.g. Intrum Ltd.
- If your home connection (e.g. fibre optic access) is set up by an **installation partner**, they will receive your contact details.
- If you have won concert tickets in a Swisscom raffle, we will provide the **organiser / sponsoring partner** with your name and email address.
- If you order goods from us, we will transmit your name, postal address, e-mail address or telephone number to the contracted **forwarding company** for the delivery of the goods and the provision of shipment information.
- If you dispute the charge for a value-added service, we may provide your contact and identification data to the relevant **value-added service provider**.
- If you pay for a service with Swisscom Pay, we may provide your mobile number to the **relevant provider** for billing purposes.
- If we are allowed to give your name at your old residential address after you move house, the **next tenant** as well as **other providers of fixed network connections** and their distribution partners will be able to see your name in order to facilitate the creation of a new connection.
- If we pass on your e-mail address and your mobile phone number to a **marketing platform** in encrypted form (SHA-256 hashing), we can display Swisscom offers to you in a more targeted manner on the websites and in the app of the platform in question and on the websites of the platform partners (e.g. Google adverts on a third-party website). You can find more information above under "Swisscom offers on third-party platforms".

Address updating partners

Through our group company "Swisscom Directories Ltd", we participate in an address updating network. It does not sell or trade addresses, but rather pursues the purpose of optimising address quality for the companies involved. In addition, we conduct address searches as a service for business customers.

Examples:

- If your address changes, e.g. after notification of a move, we will report the updated address data to "**Swisscom Directories Ltd**". It transmits your address data exclusively to those **companies from the address network** that confirm that they have a customer relationship with you.
- If, for example, an invoice that **Swisscom** sends to you on behalf of a medical practice cannot be delivered, we will compare the recipient information with Swisscom's customer data. If we discover, for example, that an old address has been used, we will inform the relevant **medical practice** of the current address so they can update the data.

To the settings:

swisscom.ch/myswisscom-adressaktualisierung

To the settings for Wingo, Coop Mobile, M-Budget Mobile:

mywingo.wingo.ch // myaccount.coopmobile.ch // selfcare.m-budget.migros.ch



What kind of data is involved?

Usage data

How and when you use our products, services and online offerings (MySwisscom, TV offerings, websites, apps, etc.) and what individual settings you make (language, functionalities, TV channel configuration, Wi-Fi operating hours)

Connection data

Data from your use of telephony and internet services

Purpose of processing

Contract performance and execution

We use your data to ensure the conclusion, performance, termination, renewal and enforcement of your contracts, to invoice services and to detect, prevent and eliminate misuse of our products, services or infrastructure.

In particular, we use

- your **language settings** on websites and apps to show you content in the right language.
- Information about the **apps** you **use** to identify the cause of a reported error.
- the **evolution of the use** of our services for the expansion of our mobile and broadband networks.
- your **usage data** from “blue TV” to display functions that are suitable for you and personal programme recommendations (depending on the settings in “blue TV”).
- your **connection data** (date, time, duration, telephone number and countries to which a call is transmitted) to charge for our telephony service.
- the allocation of your **storage space** on myCloud to draw your attention to storage shortages in good time.

Third-party services

We use your data to enable you to purchase third-party services via your Swisscom bill or prepaid balance, and to give you the option of using the functions of social media platforms (e.g. Facebook, YouTube, LinkedIn etc.) on our website.

In particular, we use

- the **date, time, SMS value-added service number used** and **number** of SMS messages sent and received for billing purposes if you purchase SMS value-added services.
- the **090x numbers** called as well as the date, time and duration of these calls for billing purposes.
- the **transactions** relating to third-party services (e.g. purchases of apps or blue Cinema tickets) so you can pay for them with Swisscom Pay.

Product development and improvement

We use your information to improve, develop or expand our services, products, their usability and our support for them.



In particular, we use

- your **browsing habits** in My Swisscom to make useful information more easily accessible.
- the number of **telephone minutes, data volume** used and **roaming regions** of customer groups to price our products attractively.
- your **choice** and **intensity of use** of the contact channel to tailor our support services to customer needs.
- the **file formats** used on myCloud, in order to optimise its functionalities.

Fulfilment of legal obligations

We use your data to comply with our legal obligations (e.g. under telecommunications law)

In particular, we collect

- your **connection and usage data** for telephony, internet and value-added services (e.g. telephone number dialled, duration of the call or data volume used) and store it for 6 months to comply with our statutory disclosure obligations upon a corresponding official request.
- your **connection and usage data** to provide you with information about your use of telephony and internet services as well as value-added services for as long as the option of contesting an invoice exists.

Offers from Swisscom

We use your data to provide you with general offers on our services and products or offers that are tailored to you based on the compilation and evaluation of your data ("profiling").

In particular, we use

- your **data concerning the use of TV services** from the blue product range to show you relevant and personalised suggestions from the Free TV or Video On Demand services.
- the **duration and intensity** of your use of mobile data to display subscriptions and options relevant to you in the ordering process.
- information about which **countries** you are calling, in order to provide you with suitable roaming offers.
- the **intensity** and **frequency** of your use of our Swisscom apps and online services (e.g. My Swisscom) in order to identify suitable contact channels for our marketing offers.
- your **searches on our website** (like "how much storage space with blue TV?") to show you a suitable offer on swisscom.ch, taking your customer profile into account.

To the settings:

swisscom.ch/myswisscom-swisscomangebote

To the settings for Wingo, Coop Mobile, M-Budget Mobile:

mywingo.wingo.ch // myaccount.coopmobile.ch // selfcare.m-budget.migros.ch

Origin of the data

We collect data about you

- if we, for example, record where you watch blue TV, which channels and programmes you prefer, or whether you are controlling your Swisscom TV Box with the TV Voice Control or your remote control.
- if we store the destination numbers you call, the times at which you call them, how long the calls last, which numbers you send SMS to or which IP addresses and apps you access.

Third parties provide us with your data

- if you use a blue TV product from blue Entertainment Ltd, e.g. rent a film, we receive your corresponding usage data.



Recipients of the data

Swisscom Group companies

- that are engaged as contractors for the provision of our services, the provision and maintenance of our products, as well as distribution and marketing.
- that receive your data and use it on their own responsibility or in shared responsibility with us.
- from which you obtain additional services through us.

Examples:

- If you use services of the Swisscom Group company “**blue Entertainment Ltd**” (“blue+”) (e.g. on-demand films and sporting events, blue+ subscriptions), we may transmit data concerning the duration and type of TV use to blue+. This enables blue+ to display or deliver tailored content regarding the blue+ offering (e.g. sports or video on demand offers, VOD) to its customers. You can choose your corresponding settings.

To the settings:

swisscom.ch/myswisscom-swisscomangebote

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Federal and Cantonal Prosecution Authorities

Examples:

- Based on a corresponding official order, we are legally required to transmit data about your use of telecommunications services, such as telephony and the internet, to the **competent authority**.
- Upon a corresponding official order, we are legally required to enable the **competent authority** to monitor your communications (particularly listening in on telephone conversations) in real time.
- Upon a corresponding official order, we are legally required to hand over to the **competent authority** information such as e-mails read, myCloud files or other content and usage data that are not (or no longer) subject to telecommunications secrecy.

Service providers, distribution partners and other third parties

Companies outside the Swisscom Group:

- that are engaged as contractors for the provision of our services, the provision and maintenance of our products, as well as distribution and marketing.
- that receive your data and use it on their own responsibility or in shared responsibility with us.
- from which you obtain additional services through us.
- whose social media plugins are incorporated into our website. Social media plugins allow you for instance to share certain content from our website via social media channels or to display certain content on our websites (e.g. YouTube videos). If you enable a plugin of this type by clicking on the provider's icon, certain personal information concerning you will be transmitted to the operator of the social media platform (e.g. Facebook, YouTube, LinkedIn) so that it is able to track your usage of online content.

Examples:

- In order to provide services, we also rely on cloud services. Such a **cloud provider** (e.g. Amazon Web Services) may have access to your usage data as part of operating and maintenance services.
- If you purchase additional third-party services via Swisscom (e.g. Selecta), we will transfer to these **third-party providers** the usage data necessary for providing the service and, if applicable, for collection (unless this is done by Swisscom).
- If you dispute the invoicing of an SMS value-added service, we may inform the relevant **value-added service provider** of the date, time, SMS value-added service number used and number of SMS messages charged.
- If you dispute the charge for a 090x service, we may notify the relevant **value-added service provider** of the date, time, 090x numbers called and the duration of those calls.



Research partners

Companies outside the Swisscom Group with which we collaborate for statistical analysis and the development or improvement of products, user behaviour or the potential applications of new technological developments.

Examples:

- The independent **media research foundation “Mediapulse”** or **Mediapulse AG** receives pseudonymised media usage data for the purpose of compiling statistics on the development of usage of scientific or political broadcasts.

To the settings:

swisscom.ch/myswisscom-mediapulse

To the settings for Wingo, Coop Mobile, M-Budget Mobile:

mywingo.wingo.ch // myaccount.coopmobile.ch // selfcare.m-budget.migros.ch



What kind of data is involved?

- Technical information (e.g. type, brands, software versions, device IDs, settings, connection type and connection quality between Swisscom devices and personal devices) about your **Swisscom devices** (e.g. Swisscom router, Internet booster, Swisscom TV-Box)
- Standard technical parameters (e.g. smartphone device number IMEI, MAC address, host name) regarding your **personal devices** (e.g. smartphones or PC)
- Information about your browser **type and settings**, view formats, bandwidths used, connection type, speed and quality, and
- Information on **address elements** such as telephone numbers or IP addresses

Purpose of processing

Contract performance and execution

We use your data to ensure the conclusion, performance, termination, renewal and enforcement of your contracts, to invoice services and to detect, prevent and eliminate misuse of our products, services or infrastructure.

In particular, we use

- your **phone number** when we set up a phone connection for you.
- Data regarding the **connection quality** in our mobile network to optimise our network capacity.
- **technical data** from connected Swisscom devices, such as a router or TV-Box, in order to set them up automatically via remote access, check their functionality and update their software.

In addition, we use

- data to **analyse** your **home network** to identify connection quality or speed deficiencies, troubleshoot issues, or recommend adjustments to you.

To the settings:

swisscom.ch/myswisscom-produktentwicklung

To the settings for Wingo, Coop Mobile, M-Budget Mobile:

mywingo.wingo.ch // myaccount.coopmobile.ch // selfcare.m-budget.migros.ch

Product development and improvement

We use your information to improve, develop or expand our services, products, their usability and our support for them.

In particular, we use

- **technical data** from your **mobile devices** connected to the Swisscom network regarding product development.

In addition we use

- data regarding the **stability** and other **features** of your **home network**, such as the number of connected devices, to improve our services and the performance of our products.
- data regarding the **type and features** of personal devices connected to your home network, for product development purposes.

**To the settings:**

swisscom.ch/myswisscom-produktentwicklung

To the settings for Wingo, Coop Mobile, M-Budget Mobile:

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Third-party services

We use your data to enable you to purchase third-party services via your Swisscom bill or prepaid balance

In particular, we use

- your **mobile number** for billing if you purchase SMS value-added services.
- your **mobile or landline number** for billing if you call 090x numbers.
- your **mobile phone number** for identification and, in certain cases, for billing purposes if you purchase products and services from third-party providers and pay for them with Swisscom Pay.

Fulfilment of legal obligations

We use your data to comply with our legal obligations (e.g. under telecommunications law)

In particular, we collect

- **technical usage data** for **telephony** and the **internet** (e.g. device number or IP address) and store them for 6 months so that we can comply with our statutory disclosure obligations upon request.
- various **technical data** necessary to produce anonymised official telecommunications statistics.

Offers from Swisscom

We use your data to provide you with general offers on our services and products or offers that are tailored to you based on the compilation and evaluation of your data ("profiling").

In particular, we use

- your technical data for the **smartphone** you are using to inform you about new products or suitable accessories.
- your technical data on your **internet connection speed** to provide you with offers for more powerful devices or current special offers on Internet services.
- the model of your **Swisscom TV-Box** to provide you with offers for newer receivers.

To the settings:

swisscom.ch/myswisscom-swisscomangebote

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Origin of the data

We collect data about you

In particular, we evaluate the causes of mobile network disturbances, such as failed call attempts or dropped connections, or check the connection quality within your home network on your router.

Third parties provide us with your data

- if, for example, we buy device-related measurements of network quality from providers of speed tests.

Recipients of the data

Swisscom Group companies

- that are engaged as contractors for the provision of our services, the provision and maintenance of our products, as well as distribution and marketing.
- that receive your data and use it on their own responsibility or in shared responsibility with us.
- from which you obtain additional services through us.

Examples:

- "**cablex Ltd**" field sales staff can retrieve technical information such as the serial number of your connection if they fix connection problems at your home.
- We may provide the type of your TV Box and TV set to "**Blue Entertainment Ltd**" so that it can optimally design its service.

Authorities

Offices, courts and other authorities with criminal or police functions.

Examples:

Based on a corresponding official order, we are legally required to transmit technical data on telephony, internet and e-mail to the **competent authority**.

Service providers, distribution partners and other third parties

Companies outside the Swisscom Group

- that are engaged as contractors for the provision of our services, the provision and maintenance of our products, as well as distribution and marketing.
- that receive your data and use it on their own responsibility or in shared responsibility with us.
- from which you obtain additional services through us.

Examples:

- If you make calls abroad, your IMSI (International Mobile Subscriber Identity), telephone number and device number are processed by our local **roaming partners**.
- Our **maintenance service providers** access Swisscom infrastructure and Swisscom devices to support us in troubleshooting and can see, for example, our customers' IP addresses or connection information.
- **Support service providers** who support us in servicing customers on the hotline need information as to which device or software version you are using.
- In order to investigate unlawful use of services, the **service providers** we use for this may access certain login data and session data such as IP address and device information.
- We may provide our **software service provider** with standard technical parameters, such as host name and brand, as well as technical information on connection type and quality such as lost packets and the signal strength of your personal devices. We do this to improve the quality of the solution we use for the optimisation of Wi-Fi quality and the detection of device types.



What kind of data is involved?

Account information, credit card details, prepaid balance, payment history, financial solvency, revenue, creditworthiness data or purchasing power

Purpose of processing

Contract performance and execution

We use your data to ensure the conclusion, performance, termination, renewal and enforcement of your contracts, to invoice services and to detect, prevent and eliminate misuse of our products, services or infrastructure.

In particular, we use

- your **account details** for refunds or credits.
- the information about your **prepaid balance** to check whether you are eligible to receive our services.
- your **billing data** as well as your **payment history** for the collection of our invoices.
- your solvency score for deciding whether to conclude a mobile subscription contract.

Automated individual decision: Decisions about concluding new contracts are made automatically when we check your solvency. In other words, they are not determined by our employees, but by algorithms based on stored rules. If you are unable to conclude a contract with us due to such an automated individual decision, we will inform you of your rights when we notify you of this decision.

Third-party services

We use your data to enable you to purchase third-party services via your Swisscom bill or prepaid balance.

In particular, we use

- your **credit data** if you purchase products and services from third parties and pay for them with Swisscom Pay
- The information about your **prepaid balance** to check whether you are eligible to obtain services from third parties

Product development and improvement

We use your information to improve, develop or expand our services, products, their usability and our support for them.

In particular, we use

- your **revenues** from our mobile products for the design of new prepaid and roaming tariffs.
- your **revenues** from our services, such as My Service, to design our support offers.

Fulfilment of legal obligations

We use your data to comply with our legal obligations (e.g. under the Swiss Code of Obligations or the Anti Money Laundering Act)

In particular, we collect

- **payment information** (e.g. payment type, account number) to fulfil our archiving obligations.
- your **revenues** from products and services that you purchase from **third parties** and charge to the Swisscom invoice or prepaid balance in order to verify compliance with the Anti-Money Laundering Act.



Offers from Swisscom

We use your data to provide you with general offers on our services and products or offers that are tailored to you based on the compilation and evaluation of your data ("profiling").

In particular, we use

- your **revenues** in the prepaid segment to provide you with suitable offers for mobile subscriptions.
- the frequency and amounts of **increases in your prepaid credit** to inform you of convenient terms.
- the **amounts charged to you for calls abroad**, in order to offer you suitable flat rates.

To the settings:

swisscom.ch/myswisscom-swisscomangebote

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Origin of the data

You provide us with data

if, for example, you provide us with your account information for the automatic payment of our invoices via direct debit.

We collect data about you

if, for example, we analyse revenue performance using your Swisscom invoices.

Third parties provide us with your data

if, for example, we obtain an extract from the debt enforcement register to collect payments for our activities or obtain data from credit reporting agencies to assess your financial solvency.

Recipients of the data

Authorities

Offices, courts and other authorities with criminal, police, regulatory or judicial functions

Examples:

- If so instructed by authorities and supervisory bodies, we are legally required to provide the competent authority with financial data and information for the payment of invoices (e.g. bank details, account number).
- To enforce our claims, we disclose information about your revenue and the outstanding invoice amount to **debt enforcement offices or courts**.

Service providers, distribution partners and other third parties

Companies outside the Swisscom Group

- that are engaged as contractors for the provision of our services, the provision and maintenance of our products, as well as distribution and marketing.
- that receive your data and use it on their own responsibility or in shared responsibility with us.
- from which you receive additional services via us.
- with which Swisscom exchanges information regarding the fraudulent or abusive use of telecommunications services with the intention of detecting, preventing or eliminating such use.



Examples:

- If you are behind in paying invoices, we may send information about the outstanding invoice amount to a **collection service provider**.
- If the **invoice** is sent by one of Swisscom's service providers, the invoice data will be visible to it.
- If you do not pay the invoice on time for a value-added service purchased, the **value-added service provider** may be informed of the outstanding invoice amount.



What kind of data is involved?

Information obtained from Bluetooth, Wi-Fi or GPS signals, IP address or mobile phone network about where **you are** or the corresponding device is at a particular time or where you are **going**

Purpose of processing

Contract performance and execution

We use your data to ensure the conclusion, performance, termination, renewal and enforcement of your contracts, to invoice services and to detect, prevent and eliminate misuse of our products, services or infrastructure.

In particular, we use

- your **location data** from the mobile network so that emergency services can locate you when necessary.
- your **IP address** in order to check the usage rights for content on blue TV from abroad.
- the **frequency** of the antenna locations utilised, in order to inform you about shutdowns.
- the **GPS signal** of randomly selected mobile phone users (< 1%) to optimise our mobile phone network.

Fulfilment of legal obligations

We use your data to comply with our legal obligations (e.g. under telecommunications law).

In particular, we collect

- as required by law your **location information** in connection with your use of the mobile network, which must be provided by order of the authorities in any criminal proceedings.
- the **technical contact** of your smartphone with a foreign mobile network (roaming), in order to inform you of the tariffs applicable there.

Analysis of anonymised location data

We use your data to obtain statistical and analytical information on flows of people (data products) using anonymised data from mobile phone traffic.

In particular, we use

- **anonymised location data** combined, where appropriate, with further anonymised data on persons moving in a specific area, such as age or residential area, for traffic flow analysis on behalf of town planners or transport operators.

To the settings:

swisscom.ch/myswisscom-standortdaten

To the settings for Wingo, Coop Mobile, M-Budget Mobile:

mywingo.wingo.ch // myaccount.coopmobile.ch // selfcare.m-budget.migros.ch



Origin of the data

We collect data about you

if, for example, we use your IP address or your smartphone to determine your current location or direction of movement.

Recipients of the data

Federal or cantonal prosecution authorities

Examples:

Based on a corresponding official order, we are legally required to transmit location data from the use of the mobile network to the **competent authority**, be this for purposes of criminal prosecution or searching for missing persons.

Service providers, distribution partners and other third parties

Companies outside the Swisscom Group

- that are engaged as contractors for the provision of our services, the provision and maintenance of our products, as well as distribution and marketing.
- that receive your data and use it on their own responsibility or in shared responsibility with us.
- from which you obtain additional services through us.

Examples:

- Our **maintenance service providers** access the Swisscom infrastructure to support us in troubleshooting and can at the same time view pseudonymised location data of customers and the quality of the connection.
- We use **cloud services**, e.g. from Amazon Web Services Inc., to store and analyse location data.



What kind of data is involved?

Conversations and chats

such as recording your conversations with the Swisscom hotline and chatbots, as well as your communication and interaction with us via social media

Voice control

such as audio recordings from the voice control of the Swisscom hotline or the operation of the TV Voice Control

Transcription

Written, machine-readable recording of your voice control of the hotline/operation of the TV Voice Control and conversations with the Swisscom hotline as texts

Recorded images

Such as video footage and recorded images in our shops and video surveillance of our buildings and facilities.

Purpose of processing

Contract performance and execution

We use your data to ensure the conclusion, performance, termination, renewal and enforcement of your contracts, to invoice services and to detect, prevent and eliminate misuse of our products, services or infrastructure.

In particular, we use

- your **voice commands** on the **hotline** or your **chat input** to automatically connect you to suitable consultants or to answer your requests, such as an invoice query, automatically.
- your **statements** in hotline conversations and chats to automatically display essential information to the advisors during the exchange with you.
- your **voice commands** to the **TV Voice Control** (depending on the settings in “blue TV”) to activate the desired functions on “blue TV”.
- your **photograph** if you visit our **shops** and have granted us consent to take your photo in order to make it easier for our employees to recognise and serve you.
- **recorded images or video footage** for **identification** purposes if you conclude a contract online.

Product development and improvement

We use your information to improve, develop or expand our services, products, their usability and our support for them.

In particular, we use

- the **content** of your **chats** to improve or further develop the automated processing by our chatbot.
- the **recording** of your **calls** and the **evaluation** of your **conversation** on the **Swisscom hotline** to ensure the quality of service and the training of our employees.
- your **voice commands** on the **hotline** or the **TV Voice Control** to make relevant search commands even easier to access or to improve speech recognition itself.
- individual **voice recordings** of your commands on the **hotline** or the **TV Voice Control** to have them transcribed by humans and to improve the speech recognition system.



To the settings:

swisscom.ch/myswisscom-produktentwicklung

To the settings for Wingo, Coop Mobile, M-Budget Mobile:

mywingo.wingo.ch // myaccount.coopmobile.ch // selfcare.m-budget.migros.ch

Security of our shops, buildings and facilities

We use surveillance cameras in our shops and in our buildings and facilities for the purpose of for instance preventing or investigating theft, burglary, damage to property and contamination.



Offers from Swisscom

We use your data to provide you with general offers on our services and products or offers that are tailored to you based on the compilation and evaluation of your data ("profiling")

In particular, we use

- the **recording** of your **calls** and the **evaluation** of your **conversation** on the **Swisscom hotline** to offer you suitable offers or solutions.
- the **content** of the **chat** to show you suitable offers on the website.

To the settings:

swisscom.ch/myswisscom-swisscomangebote

To the settings for Wingo, Coop Mobile, M-Budget Mobile:

mywingo.wingo.ch // myaccount.coopmobile.ch // selfcare.m-budget.migros.ch

Origin of the data

You provide us with data

if, for example, you communicate with our chatbot.

We collect data about you

if, for example, we record your conversations with the hotline as machine-readable text.

Recipients of the data

Authorities

Courts and other authorities with criminal functions

Examples:

- Based on a corresponding official order, we are legally required to hand over existing conversation recordings and chat histories to the **competent authority**.

Service providers, distribution partners and other third parties

Companies outside the Swisscom Group

- that are engaged as contractors for the provision of our services, the provision and maintenance of our products, as well as distribution and marketing.
- that receive your data and use it on their own responsibility or in shared responsibility with us.
- from which you obtain additional services through us.

Examples:

- When calls are made to the hotline, we may transmit your voice commands to the **voice recognition service of a service provider** (e.g. Microsoft) to trigger the desired control.
- We use **cloud services**, e.g. from Amazon Web Services Inc., to store and evaluate voice recordings or chats.
- You can contact us via various **third-party communication platforms**, e.g. Facebook, YouTube, LinkedIn, WhatsApp, Apple Business Chat or Google Business Messages. If you use these solutions, the Terms of Use and Privacy Policies in effect between you and the **third-party providers** will also apply. In the case of some third-party providers, you should assume that they will view the content of the chats. In addition, a provider may collect other data from you (e.g. user behaviour) and use such data along with other data already available to it (e.g. for marketing purposes or for the purpose of personalising platform content).



- We use a variety of tools, such as Genesys, Khoros and AppFollow, to assign your requests to the right support center and to coordinate our social media interactions with you. The **tool providers** may have access to exchanges with you as part of **maintenance services**.
- We provide our **software service provider** with recordings of your voice control of the TV Voice Control to improve the quality of the speech recognition solution we use.

To the settings:

swisscom.ch/myswisscom-produktentwicklung

To the settings for Wingo, Coop Mobile, M-Budget Mobile:

mywingo.wingo.ch // myaccount.coopmobile.ch // selfcare.m-budget.migros.ch



Your data may also be processed abroad, in particular if we engage service providers and distribution partners for the provision of our services, the provision and maintenance of our products, as well as distribution and marketing. The processing of your data may take place worldwide but will occur primarily in countries of the European Economic Area, Kosovo and the USA.

Examples:

- Connection data is processed in all countries in which you use Swisscom telecommunications services as well as in countries in which your conversation partners are located.
- Data exchanged over the Internet may be transferred abroad even if both the sender and the recipient are located in Switzerland.
- The data processed in order to provide Swisscom offers may be stored on the servers of **advertising service providers** abroad (e.g. in the **USA**) and processed there for designing our marketing campaigns.
- Calls to our **hotline** may be processed by support service providers abroad (e.g. in **Kosovo**). In the process, their employees will be given access to your data if necessary.
- **DevOps Centers** that are part of the Swisscom Group may view applications containing contact details and other information about you when providing development and operational services from the **Netherlands and Latvia**.
- To ensure efficient operation, applications can be operated on **cloud platforms**. Under certain circumstances, cloud providers may obtain access to your data from **abroad**, subject to the application of foreign law.

If the processing occurs in countries whose legislation does not provide an adequate level of data protection, the protection of your data is ensured by taking the measures prescribed by law, such as the conclusion of contractual agreements (standard contractual clauses of the European Commission, which are available here https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj) as well as appropriate technical and organisational measures.



We only use and store your data for as long as it is necessary or technically required to achieve the purposes for which it was collected, to comply with statutory retention periods and for our legitimate interests in documentation. After that, your data is deleted or anonymised.

Examples:

- To comply with our financial reporting and retention obligations, e.g. we generally keep your invoices for **10 years** even after your payment.
- To comply with our obligations under the Federal Act on the Surveillance of Postal and Telecommunications Traffic (SPTA), we retain your connection data for **six months**.
- Following your termination of the contract, we will retain your master and contract data for **two years** in order to make it easier for you to resume the customer relationship and to inform you of new offers.
- If there are still outstanding claims, or if misuse is suspected, we will retain your orders, notices of termination or instructions to us even after the termination of the agreements for **as long as necessary** to enforce legal claims.
- If certain data cannot be separated from other data, it will remain stored until the entire **data record is deleted** (e.g. by overwriting backup copies).
- Usage data is retained for the period **relevant** to the intended product development (e.g. two years in the case of TV services)
- Voice recordings containing personal information about you are retained for as long as necessary to provide the service, to improve and further develop the speech and intent recognition system, but for **no more than five years**.
- Photographs that we take of you with your consent in our shops are **deleted at the end of the day** on which you visited our shop.



To protect your data against unauthorised or unlawful processing and to secure it against loss, unintentional alteration, unwanted disclosure, or unauthorised access, we take technical and organisational measures, such as

- **encrypting** and **pseudonymising** certain data.
- creating **backups**.
- **logging** accesses and implementing technical **access restrictions**.
- issuing binding data processing **instructions** to our employees.
- undertaking protection and **confidentiality agreements** with our service providers as well as the corresponding controls.

The content of your communications with third parties will only be recorded if we are ordered to do so by a competent authority based on a corresponding decree.

We only access the contents of your personal devices, e.g. in the event of malfunctions, with your express consent and only as necessary for troubleshooting.

Unless a special form of professional secrecy (e.g. medical confidentiality) or banking secrecy applies in the specific case, we are not subject to any professional confidentiality. If you believe any of your data is subject to a duty of confidentiality, please let us know so we can review your matter of concern.



Customer

You can choose **individual settings** regarding our usage or your data, e.g.

- Offers from Swisscom
- processing of your data for product development, improvement and research purposes
- processing your data for the purpose of analysing flows of people

You also have certain **rights**, such as

- the right to information regarding the data processed about you
- the right to deletion of your data
- the right to correction of your data
- the right to the disclosure of certain data

To take advantage of these options, log into **My Swisscom** at swisscom.ch/myswisscom-privacy or contact us. Your rights may be subject to legal prerequisites and certain restrictions.

We use **cookies** and other tracking technologies on our websites. You can adjust your settings at swisscom.ch/cookies and change them at any time.

As a Wingo, Coop Mobile and M-Budget Mobile customer

You can choose **individual settings** regarding our usage of your data and can exercise certain **rights**. Log in to the customer center to make use of these options or contact us. If you do not find a setting for certain mentioned data usage, it doesn't take place in connection with the service you have obtained.

- mywingo.wingo.ch
- myaccount.coopmobile.ch
- selfcare.m-budget.migros.ch

Non-customer

Even if you are not (or are no longer) our customer, you still have certain **rights**, such as

- the right to information regarding the data processed about you
- the right to deletion of your data
- the right to correction of your data

To exercise these rights, please use one of the templates on our website swisscom.ch/privacy or contact us. Your rights may be subject to legal prerequisites and certain restrictions.

- Template Request for information:
<https://cms.swisscom.com/content/dam/assets/b2c/products/datenschutz/auskunftsbegehrenen.pdf>
- Template Request for correction:
<https://cms.swisscom.com/content/dam/assets/b2c/products/datenschutz/berichtigungsbegehrenen.pdf>
- Template Request for deletion:
https://cms.swisscom.com/content/dam/assets/b2c/products/datenschutz/loeschbegehren_en.pdf

If you were previously one of our customers, as long as the contract was not terminated more than 3 months ago you can also log in via **My Swisscom** at swisscom.ch/myswisscom-privacy and download any of your data still available at this point in time.

We use **cookies** and other tracking technologies on our websites. You can adjust your settings at swisscom.ch/cookies and change them at any time.



If the EU General Data Protection Regulation (GDPR) is applicable, depending on the purpose, the use of your data takes place on the following **legal basis**: Necessity for the **conclusion or performance of a contract**¹, for the **fulfilment of legal obligations**², on the basis of your **consent**³ or due to a **legitimate interest**⁴.

We have a legitimate interest principally in the use of the respective data types for the purposes mentioned above. This includes the provision of third-party services to you, the development and improvement of our products and the submission of offers as well as the analysis of traffic flows based on anonymised data. We also have a legitimate interest in forwarding the data to the respective recipients mentioned.

¹ according to point (b) of Article 6(1) GDPR

² according to points (c) and (f) of Article 6(1) GDPR; point (g) of Article 9(2) GDPR

³ according to point (a) of Article 6(1) GDPR and point (a) of Article 9(2) GDPR

⁴ according to point (f) of Article 6(1) GDPR

If your rights are violated, you can assert them either by bringing an **action before the competent court** or by filing a **complaint with the competent data protection authority**.

- Contact details data protection authority in Switzerland: Federal Data Protection and Information Commissioner <http://www.edoeb.admin.ch>
- Contact details data protection authorities in the European Economic Area: https://edpb.europa.eu/about-edpb/about-edpb/members_en



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

- By using the contact form: swisscom.ch/contact
- By telephone: 0800 800 800
- By post: Swisscom (Switzerland) Ltd, Contact Center; CH-3050 Bern

If you use services from the Wingo, M-Budget or Coop Mobile range of products and services, you may contact us as follows:

– **Wingo**

By using the contact form: wingo.ch/de/kontakt

By telephone: 0900 94 93 92 (CHF 1.50/min for the first 10 minutes; all subsequent minutes are free of charge) By post: Wingo, Contact Center, CH-3050 Bern

– **Coop Mobile:**

By using the contact form: coopmobile.ch/de/kontakt By telephone: 0800 746 746

By post: Coop Mobile, Contact Center, 3050 Bern

– **M-Budget Mobile:**

By using the contact form: shop.m-budget.migros.ch/de By telephone: 0800 151 728

By post: M-Budget, Contact Center, CH-3050 Bern

You may contact the **data protection officer or data protection advisor** of Swisscom Ltd and Swisscom (Switzerland) Ltd as follows:

- By email: datenschutz@swisscom.com
- By Post: Swisscom (Switzerland) Ltd, Data Protection Officer Swisscom Ltd and Swisscom (Switzerland) Ltd, P.O. Box, 3050 Bern

Our Data Protection Representative in the European Union may be contacted by supervisory authorities and data subjects on all issues relating to EU data protection law as follows:

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

We may amend our Privacy Policy at any time. The most up-to-date version can be found on our website at

www.swisscom.ch/privacy.