



Decide with Confidence

# Customer Anonymity – Guiding Principles

## *Background*

To D&B, customer confidentiality is a key element of the business. Our customers place their trust in D&B protecting their anonymity. The anonymity of the customers has been fairly easy to protect as long as D&B has conducted its business within the borders of one country. However, with increasing globalisation and cross border trade, the need to move information between countries has also increased. Today, information on more than 190 million businesses world-wide can be accessed through the services of D&B and partners.

D&B provide customers with information which enable them to make sound business decisions. This information can sometimes contain data on living persons. To protect the integrity of these persons there is legislation in place that determine what data a data controller can collect and to what extent the data can be processed. This legislation varies somewhat from country to country. The cross border transfer of information can lead to situations where D&B in one country is legally forced to meet the rights of the data subject but D&B in another country is not. How should we act in situations like these?

## *Guiding principles*

- D&B work to ensure customer anonymity, but we can not guarantee it.
- Legislation may force D&B to breach customer anonymity. For instance to be able to comply with the applicable data protection legislation in the country in which the business entity (the data subject) resides.
- If requested by another D&B office, the identity of a certain subscriber/customer should be revealed without undue delay.
- The requestor shall include as much information as possible regarding the ordered credit report. This can include the IRG-tag (if available), date for order, Data subject D-U-N-S NR and name, sub-nr. etc.
- The requestor shall state the legal grounds for requesting the end user information. The reason for this is so that the D&B office receiving the request can provide this information to the customer/end user if deemed necessary.
- If you receive a request for revealing a customer's identity, you shall assume that the requestor has the appropriate reasons for making the request. If any doubt arises, ask the requestor to verify the legal grounds.
- If deemed necessary, D&B shall contact the subscriber/customer and explain the reasons for revealing their identity to another D&B office and to the data subject.