

Functional Policy Statement: Global Data Subject Rights

Effective Date – 23.Jan.2023. Last Updated – 24.Jun.2024

OUR POLICY COMMITMENT

At Dun & Bradstreet (D&B), we are committed to respecting the data and digital rights of individual persons in both their personal and professional capacities. We believe that transparency and data quality are fundamental to the trust we wish to build and preserve in connection with our role as a leading business-decisioning data and analytics provider. We strive to honor data subject rights in accordance with well-established public policy principles for individual participation related to data processing and protection, our ethical principles of *Respect* and *Responsibility* set forth in our [Code of Conduct and Ethics](#), rights enshrined in applicable laws, and the value we place on the protection of human rights and civil liberties. We aim to provide individual persons about whom we process data with transparent and accessible opportunities to know what data D&B processes about them, to correct inaccuracies, to object to and/or opt-out of non-essential data processing, and to delete data about them in accordance with applicable laws that is not essential for core compliance, financial, and risk decisioning solutions and other services we provide or the effective and compliant operations of our business.

This Policy Statement describes our baseline principles and operating standards for honoring the data subject rights of individual persons consistent with our commitment to transparency and data ethics, and in accordance with applicable laws. This Policy provides a framework for compliance and effective risk management under privacy, data protection, defamation and other laws, rules, and regulations globally that relate to data subject rights, individual participation, and the decisional privacy rights of individuals. This Policy sets the floor for our approach to data subject rights at D&B. Where an applicable law, rule, regulation, or contractual obligation requires a higher standard, we will follow the requirements of that law, rule, regulation, or contract. Except where applicable laws extend the data rights of individual persons to legal entities, this Policy does not apply to legal entities, however, D&B will use the principles and standards of this Policy to inform its decisions in cases of requests regarding data about legal entities in accordance with applicable laws.

PRINCIPLES AND OPERATING STANDARDS

The following eleven Principles and Operating Standards guide the way we work to meet our Policy Commitment.

1. **Right to Know:** Individual persons have the right to know whether D&B processes personal data about them, for what purposes, and other information as required by law. In accordance with the *Data Transparency* principle of the [Data Compliance and Ethics Policy](#) and the *Personal Data Transparency* principle of the [Privacy and Personal Data Protection Policy](#), D&B addresses this right through our privacy and data protection notices and our transparency statements. Upon valid request from a verified individual or that individual's authorized representative, D&B shall inform the individual of whether it processes personal data about that individual, the categories of personal data processed, the categories of sources of personal data from which the personal data is collected, the categories of recipients to whom the personal data is closed, and meaningful information about the processing itself, such as a description of the logic involved in automated decision-making, or when the processing involves a sale of personal data, cross-border transfer, online behavioral advertising, scores, rankings, or profiling; and where applicable, the retention period for such data, the legal basis for the data processing, and other applicable rights and disclosures.
2. **Right of Access:** Individual persons have the right to access the specific personal data D&B processes about them and other information as required by law. Upon valid request from a verified individual or that individual's authorized representative, D&B shall provide a copy, or a list, of the specific data elements processed by D&B about the individual along with any other relevant rights or disclosures required by applicable law. If D&B receives repeated requests for access to identical personal data in D&B's records, where permitted by applicable law, D&B may charge a reasonable fee to cover the expense of fulfilling multiple requests for the same data.
3. **Right of Correction:** Individual persons have the right to correct, update, amend and/or supplement inaccurate personal data that D&B processes about them. The extent to which data may be corrected, updated, amended, or supplemented shall be determined in accordance with the context, form and state of the specific data elements, the purposes for which they are processed by or on behalf of D&B, and the laws applicable to such personal data. Upon confirmation of a valid request from a verified individual or that individual's representative, including sufficient evidence regarding the inaccuracy of the relevant data, D&B will determine whether and how to honor the request in accordance with applicable laws, and will inform the requestor of its determination and any actions taken.
4. **Right of Deletion:** Where D&B does not have a legitimate business need to process data about an individual person, or where the rights or risk of harm to an individual person outweigh D&B's



business need, such individuals have the right to deletion of the data D&B processes about them in accordance with applicable law. If D&B receives a deletion request while an applicable retention period is in effect, D&B will not honor that request unless, based on the nature of the request, D&B determines that the risk to the individual requestor outweighs D&B's need to retain the data. Where D&B no longer has a legal basis for processing personal data, such as in cases where processing is based on consent and the individual has withdrawn his or her consent, D&B will delete such data in accordance with applicable laws. D&B will not honor deletion requests where deletion would affect the integrity and quality of the solutions and services we provide, the effective and compliant operations of our business, important public interests, or our rights or the rights of others, such as freedom of expression. Where D&B does not honor a deletion request, D&B may consider suppression of data in accordance with the principles of the Right to Object and/or the Right to Restrictions in this Policy or anonymization of the data.

5. **Right to Object:** D&B provides direct communications to individuals in accordance with applicable laws. Individual persons have the right to object to D&B processing personal data about them and to receiving marketing and certain other commercial communications from D&B. Except where required by law, D&B will honor objection and opt-out requests where doing so would not affect the integrity and quality of the solutions and services we provide, the effective and compliant operations of our business, important public interests, or our rights or the rights of others, such as freedom of expression.
 - a. **Right to Opt-Out of Commercial Communications:** D&B will honor opt-out requests from individual persons related to marketing and other forms of promotional, advertising, or commercial communications. D&B will apply such requests to the information in its systems to which it reasonably can associate such a request, such as an opt-out to a specific email address or to the name of a person at a specific address. Except where required by law, D&B will not apply an opt-out to any form of commercial communication that is transactional in nature, that is related to the delivery of its products, solutions, or services, or that D&B has determined is essential for legal or compliance purposes.
 - b. **Right to Opt-Out of Data Sale:** Where required by law, D&B will honor specific requests of individual persons to opt-out of the sale of personal data about them, including information that identifies them in the products and solutions that D&B licenses to its customers and that is not otherwise publicly available. D&B will honor opt-outs of online data sharing presented through cookie settings, browser settings, and similar technical preference signals in accordance with applicable laws. Except where required by law, D&B will not attempt to link online preference signals to personal data in its



commercial systems supporting its products and solutions nor in its internal workforce management systems.

- c. **Right to Opt-Out of Data Sharing with Third Parties for Online Advertising:** If D&B shares data with Third Parties, where permitted by applicable law, for cross-context behavioral advertising or other forms of targeted advertising, D&B will provide and/or utilize readily accessible online mechanisms to enable individuals to opt-out of such data sharing. D&B will honor opt-outs of online data sharing presented through cookie settings, browser settings, and similar technical preference signals in accordance with applicable laws.
 - d. **Right to Withdraw Consent:** If D&B processes data about individuals based on their consent, D&B shall provide transparent and accessible mechanisms for withdrawal of consent that are as easy to use as the method for providing consent. D&B will prospectively honor withdrawal of consent to data processing presented through cookie settings, browser settings, and similar technical preference signals in accordance with applicable laws.
6. **Right to Restrictions:** Individual persons have the right to request that D&B restrict how it processes personal data, including any sensitive data, about them. For purposes of this Policy, sensitive data includes data categorized as sensitive, special categories, or data otherwise subject to special protections or prohibitions under applicable laws. If D&B receives a request for a restriction or limitation on its use of personal data, D&B will honor such restrictions in accordance with applicable laws and otherwise based on an evaluation of the rights or risk of harm to the individual person against D&B's legitimate business need for the data.
 7. **Right to Data Portability:** Individual persons have the right to request that data they provide to D&B in connection with their individual use of a D&B automated product or service, such as a direct data upload, be returned or otherwise made available to them in a structured, machine-readable format. Where required by applicable law, D&B also will honor a request from an authorized individual person to transfer such data to a third party designated by that individual. This right does not apply to D&B customer requests for data that they have provided pursuant to a services or licensing agreement with D&B. Such requests shall be handled in accordance with the terms of the applicable services or licensing agreement with D&B. This right does not apply to data about individuals that D&B has obtained from data suppliers or other third-party sources.
 8. **Non-Retaliation:** Consistent with our [Code of Conduct and Ethics](#), D&B will not retaliate nor discriminate, nor tolerate any retaliation or discrimination, against any individual who exercises rights provided by D&B under this Policy or applicable law. If an individual exercises rights provided by D&B under this Policy or applicable laws, D&B will not deny access to its



commercial solutions and services, charge different prices or rates for its commercial solutions or services, or provide a different quality of its commercial services or solutions to that individual unless the difference in price or quality is reasonably related to the value of the data related to that individual and such price or quality difference is permitted by applicable law. If a job applicant, current or former employee, other workforce member, or plan beneficiary exercises rights in good faith provided by D&B under this Policy or applicable laws, D&B will not tolerate any form of reprisal, harassment, intimidation, threats, coercion, discrimination, or retaliation against that individual.

9. **Third Parties:** Consistent with our *Code of Conduct for Third Parties*, Dun & Bradstreet expects third parties with which we engage to process data about individual persons to be transparent about their practices and to honor data subject rights consistent with the nature of their engagements with Dun & Bradstreet.
10. **Response Timelines:** Unless a shorter timeframe is required by law or a regulatory or legal obligation applicable to D&B, or an extension is needed and permitted in accordance with applicable laws, D&B will honor requests received pursuant to this Policy as soon as practicable and within one month of receipt.
11. **Multiple Requests:** Except where required by law or a legal or regulatory obligation applicable to D&B, D&B will not honor multiple or repeated requests from the same individual to exercise the same right more than once every three months. If the data D&B holds about an individual has changed or the risks to the individual have changed, however, D&B will honor multiple or repeated requests during the three-month window provided that such requests are not excessive or otherwise unreasonable.

QUESTIONS AND CONCERNS

Questions or concerns regarding this Policy Statement should be directed to Dun & Bradstreet Global Compliance & Ethics at complianceofficer@dnb.com.

