
Dun & Bradstreet (New Zealand) Limited

***Assurance Report under Clause 9
of the Credit Reporting Privacy Code
for the year ending 30 June 2017***

Dated 29 September 2017



Decide with Confidence

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1. Introduction

- 1.1. Clause 9 of the Credit Reporting Privacy Code 2004 (**Code**) requires credit reporters to prepare and submit to the Office of the Privacy Commissioner (**OPC**) each year an Assurance Report (**Report**) that reflects the requirements of Schedule 6 of the Code. (For ease of reference, copies of Clause 9 and Schedule 6 are attached as Appendix 1.)
- 1.2. In summary, the Report must:
- (a) explain the process of review and reporting; and
 - (b) provide assurances about the following operational aspects of the credit reporter's business as it relates to the Code:
 - (i) that the credit reporter has in place and gives effect to policies, procedures, controls and subscriber agreements that comply with the Code;
 - (ii) that the credit reporter monitors its compliance with and in fact does comply with those policies, procedures, controls and subscriber agreements; and
 - (iii) that where breaches of the policies were identified or notified, prompt remedial action was taken.
- 1.3. A fourth element under 1. 2(b) requires that where a deficiency is identified in the previous year's report, the credit reporter (where appropriate) took prompt remedial action.
- 1.4. The relevant dates for the Report are:
- (a) it is to cover the year ended 30 June each year; and
 - (b) it is to be submitted on or before three months after the end of that year.
- 1.5. Dun & Bradstreet (New Zealand) Limited (**D&B**) established a Review Committee (**Committee**) including an independent person (clause 9 and Schedule 6(1)(b) of the Code) to prepare the Report.
- 1.6. This is the sixth year that D&B has provided a Report. A link to the Reports of previous years is [here](#).
- 1.7. What follows is D&B's Report for the year ended 30 June 2016 for submission on or before 30 September 2017.

2. Process of review and reporting: Schedule 6, clause 1

2.1 The report must include:

- (a) a statement identifying the members of the Committee, including the independent person;
- (b) information about the independent person's expertise, including confirmation that the independent person is not an employee, director, or owner of the credit reporter; and
- (c) a summary of the systematic review process and the methodology followed by the reviewer;

2.2 The Committee and the independent person

- **Ian Kaplan**, Director, Bureau Operations – D&B employee based in Melbourne
- **Katerina Paras**, General Counsel – D&B employee based in Melbourne
- **Yvonne Muller (independent person)**, Barrister and Solicitor in sole practice (also Editor and Content Manager, College of Law New Zealand), Auckland. More information about Yvonne Muller's expertise and independence is in Appendix 2. Yvonne is not an employee, director, or owner of D&B.

2.3 Summary of the review process

- (a) How D&B approaches the review:
 - (i) while the review needs to be comprehensive, the Report should be pitched at a high level and set out statements of assurances for the OPC to take as a baseline for D&B's compliance; and
 - (ii) it is therefore unnecessary for the Report to include copies of policies, procedures, controls and so on; but
 - (iii) copies of those policies must be reviewed and as far as is possible, actual compliance with them must be confirmed; and
 - (iv) copies of those policies and any other supporting documentation are in a readily retrievable form so the OPC can see them if it wants to.
- (b) The Report breaks down the requirements of the Report into their individual components, identifies the department within D&B with ultimate responsibility for currency and accuracy of the supporting documentation relating to that component, and gives the title of the document(s) containing the policy, procedure or control, and outlines the independent person's assessment of the policy and D&B's compliance with it.
- (c) The Committee points out that although as far as possible the elements of the Code have been separated out, not all documentation or commentary is mutually exclusive. Some double-up and repetition has proved unavoidable, but we have tried to avoid this as much as we can.

3. Summary of Assurances

Schedule 6 clause 2: Assurances relating to policies, procedures, controls & subscriber agreements	
(a) Does D&B have policies in place that give effect to the requirements of the Code?	Yes
(b) Do D&B's internal procedures & controls give effect to the policies & requirements of the Code?	Yes
(c) Does D&B provide information and training to staff to ensure compliance with the policies, procedures and controls?	Yes
(d) Do D&B's subscriber agreements comply with Schedule 3 and are they in place before disclosing credit information?	Yes
Schedule 6 clause 3: Assurances relating to monitoring of policies, procedures, controls and subscriber agreements	
(a) Does D&B follow its own policies, procedures & controls?	Yes
(b) Is the information held by D&B protected by reasonable security safeguards?	Yes
(c) Does D&B process information privacy requests in accordance with rules 6 and 7?	Yes
(d) Does D&B take such measures as are reasonably practicable to avoid incorrect matching of information?	Yes
(e) Is the information held by D&B subject to reasonable checks to ensure that it is accurate, up to date, complete and not misleading?	Yes
(f) Is D&B's reporting and retention of credit information in accordance with rule 9 and schedule 1?	Yes
(g) Does D&B process direct marketing lists in accordance with rule 10(1C)?	Not applicable
(h) Does D&B process suppression, release or cancellation requests in accordance with Schedule 7?	Yes
(i) Does D&B process complaints in accordance with clause 8?	Yes
(j) Is D&B's website displaying accurate information that gave effect to rules 6(4)(b), 7(4)(b), clause 8(3A) and clause 8. 1 of Schedule 7?	Yes
(k) Are D&B's subscribers complying with agreements and controls?	As far as D&B can ascertain, yes

Schedule 6 clause 4: Assurances relating to action taken on deficiencies identified	
(a) Did D&B, where, during its systematic reviews, monitoring activities or as a result of a complaint, <ul style="list-style-type: none"> • identify any breaches of an agreement, policy, procedure, control, or requirement of the code, • investigate that breach and, where appropriate, take prompt remedial action? 	Yes
(b) Did D&B, where a deficiency was identified in the previous year's report, take, where appropriate, prompt remedial action?	Not applicable. None identified.
(c) Can D&B provide an assurance it has complied with clause 6.1(b) of Schedule 8?	Yes

4. 2016-17 Focus points

4.1 In an email in June 2017 from the OPC to D&B, the OPC asked the following questions and raised the following issues about the assurance report and D&B's credit reporting processes. D&B's responses are set out below.

Question 1: What methods do you use to communicate to individuals their right to request a free credit report? This could include for example, the advice your contact centre provides to people who want to request their credit report, or how this information is presented on your website.

- On the D&B website homepage, www.dnb.co.nz, there is a prominently displayed link to further information on obtaining a credit report. This link then provides information on the different options available, including the free option. This second page links directly to www.checkyourcredit.co.nz, D&B's consumer access portal.
- Individuals contacting D&B's Public Access Centre, whether by phone or email, are advised of the different credit file options available, including the option of a free report.
- Credit Simple, a company within the Dun & Bradstreet group, offers a free and comprehensive service via www.creditsimple.co.nz, whereby consumers can instantly and for free access their credit information held by D&B whenever they wish. The information is provided in real time, thus there is no waiting period after the credit information is requested. The Credit Simple service is also advised to individuals when they enquire about access to free credit reports.

Question 2: What processes or policies do you have in place to ensure there is accuracy, consistency and alignment across the industry in the reporting of credit information? This may include for example, how internal or external guidance documents like the RCANZ data standards are used or incorporated in your processes and what steps you take to ensure that these comply with the CRPC.

- D&B is an active member of the Retail Credit Association of New Zealand (**RCANZ**). D&B uses this forum to discuss credit reporting issues, and seek industry opinion and understand industry practice where potentially contentious issues arise.
- D&B has embedded the RCANZ data standards for Comprehensive Credit Reporting (**CCR**) into its own systems and framework, and promotes the use thereof with its customers. Further, D&B offers a service whereby customer data files are transformed to RCANZ standards prior to loading the data to D&B's databases.
- D&B consults as required with external lawyers specialising in privacy law to ensure any proposed new products or processes are compliant with the CRPC.
- D&B engages with other credit reporters where questions of compliance, industry practice, or specific customer practices require broader consideration. This is done either directly with the relevant credit reporters, or in the relevant RCANZ forum.

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- D&B works with its customers to ensure, as far as possible, that credit reporting practices are consistent with broader industry practice, as well as compliant with the CRPC. While D&B does not provide legal advice to its customers, D&B does make suggestions to promote aligned practices.

Question 3: Could you highlight any improvements you have made to your processes or procedures over the course of the review period?

- D&B has consolidated its Public Access Centres for New Zealand and Australia under centralised management, to realise operational efficiencies and benefits from standardised processes, while observing the relevant regulatory requirements for each country.
- D&B continues to invest significantly in optimising data quality and integrity, thus realising incremental improvements in data completeness and integrity.
- D&B's Information Security Program was established to enhance D&B's information security in order to ensure it continues to meet or exceed current industry best practice.
- A recent independent review of D&B's privacy compliance environment was performed by KPMG. While this review focussed on D&B's Australian credit reporting operations, some of the findings are relevant to D&B's New Zealand operations given the centralisation of D&B's management over both geographies. The review concluded that D&B management and personnel have a strong understanding of D&B's privacy activities that are designed to manage D&B's compliance with privacy requirements, there is a strong top-down culture regarding the importance of applying D&B's Privacy Framework effectively and managing D&B's ongoing privacy compliance obligations, and recognition that D&B is proactive in engaging in initiatives to strengthen the Privacy Framework. The review also identified opportunities for improvement, and D&B will address these over the next twelve months.

Question 4: In addition to setting out the background of the independent person, could you also explain the role the independent person plays in your review process and how they contribute to it?

Our independent person, Yvonne Muller, leads D&B's Assurance Report process. Her involvement gives D&B confidence in its processes around the Report. Yvonne ensures that all aspects of the Report are dealt with not only in relation to the Report itself, but also and substantively in terms of D&B's internal policies and procedures. Yvonne is instrumental in ensuring the Report is completed and delivered on time.

5. Schedule 6 clause 2: Assurances relating to policies, procedures, controls & subscriber agreements

Requirement		Owner	Details	Assurance and Assessment
a	Does D&B have policies in place that give effect to the requirements of the Code?	Corp	D&B Code of Conduct D&B Privacy Training (mandatory)	Yes. D&B has an interlocking set of policies and procedures dealing with staff conduct including conduct and obligations in relation to privacy.
		IT	Network access announcement	A Privacy and IT Security statement is delivered every time an employee accesses the D&B network as a reminder of their obligations.
		HR	Employment Contracts/Deeds	Stipulates the need to comply with all requirements of D&B's privacy generally and other policies and procedures.
		PAC	Public Access Centre (PAC) Procedures Matrix (Matrix)	The PAC Matrix is focussed on allowing consumers access to their credit reports. The Matrix sets out detailed procedures for credit bureau employees to receive and process requests for access to personal information, correction updating of that information, and its suppression, release and cancellation.
b	Do D&B's internal procedures & controls give effect to the policies & requirements of the Code?	PAC	PAC Matrix	Yes. The PAC Matrix identifies not only procedures, but also the risks involved in not following those procedures. The possible consequences for the individual whose information is being handled, and for the employee who fails to follow the procedures, are clearly spelled out.
c	Does D&B provide information and training to staff to ensure compliance with the policies, procedures and controls?	PAC/HR	Details of training records kept. <ul style="list-style-type: none"> • MyStreme • ISO Quality 	Yes. Employees go through an intensive induction process and on-going training which is recorded and stored on the employee's personnel file. Both the induction and the training stress the need for employees to protect the personal information held by D&B. These processes clearly set out the requirements of the Code and what employees must do to ensure they are meeting those requirements. Employees are required to acknowledge receipt, reading and understanding of the key policies and procedures both generally through their employment agreement at the initial hiring stage, and particularly in regard to the electronic usage policy. Employees who breach the policy, having acknowledged their understanding of this or other policies, may be summarily dismissed.

Requirement	Owner	Details	Assurance and Assessment
d	Do D&B's subscriber agreements comply with Schedule 3 and are they in place before disclosing credit information?	Corp Master Agreement with credit reporting services product module	<p>Yes.</p> <p>D&B's standard terms and conditions and its credit reporting offering together comprise a subscriber agreement between D&B and its customers. These documents were initially drafted to be compliant with the Code and are updated as the Code changes.</p> <p>Customers can only become subscribers by signing up to these documents; and only after a review of the Customers' terms and conditions and how they align and relate to Schedule 3 are the Customers allowed access to credit information. The Code compliance aspects of these documents are non-negotiable.</p>

6. Schedule 6 clause 3: Assurances relating to monitoring of policies, procedures, controls and subscriber agreements

Requirement	Owner	Details	Assurance and Assessment
a Does D&B follow its own policies, procedures & controls?	Corp	Internal and external quality audits	<p>Yes.</p> <p>D&B considers privacy to be its business. It is in the company's commercial interests to follow its own policies. Because of the nature of D&B's business, both debt collection and credit reporting, D&B maintains a continuous review policy. All staff are monitored through a combination of electronic means (how they are using D&B e-resources) and in person (it is the role of team leaders to oversee performance including how staff deal with consumers and their personal information, and that staff comply with all statutory and regulatory requirements).</p> <p>In March and June 2017, SAI Global conducted ISO re-certification audits on D&B to determine whether D&B continued to meet ISO 9001:2008 standards in respect of the provision of business services (financial, credit and general) including (among other business elements) information, risk management, and credit reporting. D&B's registration as an ISO-compliant organisation was continued. The March audit reviewed the Customer Complaint Handling System including the Complaints Register (for year to 31 March 2017) and found it to be sufficiently detailed and appropriately managed, with no responses overdue; noted the existence of the Complaints Handling Committee, established to record, manage and report on customer complaints; and commented on the PAC Complaint Handling procedure's useful flow diagram.</p> <p>The ISO-certification process and D&B's continued registration under it is independent confirmation that D&B's processes relating to the identified elements and controls meet the relevant statutory and regulatory requirements.</p>

Requirement	Owner	Details	Assurance and Assessment
<p>b Is the information held by D&B protected by reasonable security safeguards?</p>	<p>IT/Corp</p>	<p>IT information security policies</p>	<p>Yes.</p> <p>D&B provides services to and handles comprehensive information for both private and public sectors. D&B values customers' data and understands the importance of cyber security and privacy requirements.</p> <p>Security of information is integral to D&B's business. To this end, D&B has aligned its security framework and policies to ISO 27001 and implements technology and information security controls to protect assets and data from loss, misuse, unauthorised access, disclosure, alteration, and destruction.</p> <p>D&B complies with the Quality Standard AS/NZS ISO9001:2008 to form a critical basis of our Quality Assurance System. D&B also maintains various policies, conducts companywide security and privacy awareness training annually, which is mandatory for all employees.</p> <p>In addition, various technical security controls are in place to manage and protect data including, but not limited to, firewall and network segmentation, Web Application Firewall (WAF), Network-based Intrusion Prevention System (IPS), Network Data Loss Prevention (DLP), Anti-virus/Anti-Malware with Advanced Threat Protection (ATP), and Endpoint Protection Anti-virus/Anti-Malware software with daily signature update across workstations and servers.</p> <p>D&B has an Information Security Steering Committee, an IT Change Management Process, and a Security Incident Management Process and register.</p> <p>In addition, and as noted in para 4.1 above, D&B has established an Information Security Program to enhance D&B's information security to ensure it continues to meet or exceed current industry best practice.</p>

Requirement		Owner	Details	Assurance and Assessment
c	Does D&B process information privacy requests in accordance with rules 6 (Access to Credit Information) and 7 (Correction of Credit Information)?	PAC/ Customer Integration	PAC Matrix	<p>Yes.</p> <p>The PAC Matrix provides detailed procedures for employees to follow when processing access to and correction of credit information. This includes online or manually received applications, standard and fast track service requests, dealing with the results/outcomes of an application, and resolving results including amendment requests whether, faxed, mailed, or emailed.</p> <p>These procedures are followed by employees, and registers are maintained of requests and outcomes. Adherence to the procedures is monitored by D&B and reviewed as part of its Quality Management System.</p>
d	(d) Does D&B take such measures as are reasonably practicable to avoid incorrect matching of information?	PAC, Business Development	PAC Matrix	<p>Yes.</p> <p>D&B recognises that one of the key components of the success of its consumer credit bureau rests on ensuring that the personal information contained in credit reports is accurate, up-to date, complete, and not misleading. D&B has significant processes and procedures in place to ensure this is the case.</p>
e	(e) Is the information held by D&B subject to reasonable checks to ensure that it is accurate, up to date, complete and not misleading?			
f	Is D&B's reporting and retention of credit information in accordance with rule 9 (Retention of Credit Information) and Schedule 1 (Maximum Reporting Periods)?	Corp, IT	IT systems software	<p>Yes.</p> <p>D&B's IT systems automatically "lapse" (purge) credit records according to the type of credit information being held. D&B has an automatic archive routine set on information collected to meet the retention periods as outlined in Schedule 1.</p>
g	Does D&B process direct marketing lists in accordance with rule 10(1C)?	N/A	N/A	N/A – D&B does not deal with direct marketing lists.
h	Does D&B process suppression, release or cancellation requests in accordance with Schedule 7 (Suppression of Credit Information)?	PAC	PAC Matrix	<p>Yes.</p> <p>The PAC Matrix has detailed procedures for dealing with suppression requests.</p>

Requirement		Owner	Details	Assurance and Assessment
i	Does D&B process complaints in accordance with clause 8 (Complaints of breach of code)?	PAC	Complaints Handling Procedure PAC Matrix	<p>Yes.</p> <p>D&B has a comprehensive complaints management system with standards that meet the statutory limits both for acknowledging and substantively responding to complainants. The D&B website sets out clear directions for lodging a complaint including e-forms that may be completed online or posted. D&B maintains a complaints register to identify the company division in which the complaint logically lies and the nature of the complaint. The D&B Complaints Handling Committee reviews and analyses all complaints regularly to identify and rectify any systemic and recurring problems.</p>
j	Is D&B's website displaying accurate information that gave effect to rules 6(4)(b), 7(4)(b), clause 8(3A) and clause 8.1 of Schedule 7?	Corp	Compliance/Audit	<p>Yes.</p> <p>D&B's website is here (http://dnb.co.nz/).</p>
k	Are D&B's subscribers complying with agreements and controls?	Corp	Compliance/Audit	<p>Yes.</p> <p>During the Report period, D&B continually reviewed the consent and control mechanisms of all its Customers with whom D&B has a subscriber agreement. To the best of D&B's knowledge and based on D&B's review of Customer documentation, all were compliant with agreements and controls.</p>

7. Schedule 6 clause 4: Assurances relating to action taken on deficiencies identified

Requirement		Owner	Details	Assurance and Assessment
a	Did D&B, where, during its systematic reviews, monitoring activities or as a result of a complaint, identify any breaches of an agreement, policy, procedure, control, or requirement of the code, investigate that breach and where appropriate, take prompt remedial action?	PAC	D&B Complaints Handling	<p>Yes.</p> <p>The D&B Complaints Handling Committee reviews and analyses all complaints regularly to identify and rectify any systemic and recurring problems. This is a topic specifically reviewed as part of the ISO Audit Review process, as well as in the course of this 2017 Assurance Report. In both cases (this Report and the 2017 ISO Audit Review), the systems were found to be working well.</p>
b	Did D&B, where a deficiency was identified in the previous year's report, take, where appropriate, prompt remedial action?	N/A	N/A	No deficiencies were identified in the 2016 Report.
c	Can D&B provide an assurance that it has complied with Schedule 8?	<p>Yes.</p> <p>In relation to comprehensive credit reporting, D&B's is reasonably assured that its subscribers have notified their customers that their data may be passed to credit reporters (including D&B). The terms relating to CCR, including the notification requirement, are part of D&B's standard terms and conditions and its relevant product offerings agreements.</p>		

8. Appendices

Appendix 1 Clause 9 and Schedule 6 of the Credit Reporting Privacy Code 2004

Clause 9 – Credit reporter must provide assurance report

- (1) A credit reporter must submit to the Commissioner annually an assurance report prepared in accordance with the requirements of Schedule 6.
- (2) The report must be prepared by either:
 - (a) an independent person having expertise in undertaking a systematic review, such as a trained auditor; or
 - (b) a review committee, established by the credit reporter, that includes an independent person with expertise in relation to matters of compliance with this code.
- (3) The report must:
 - (a) cover the year to 30 June; and
 - (b) be submitted to the Commissioner within 3 months of the end of the year.

Schedule 6 – Assurance Report

(Rules 5 and 8 and clause 9)

Clause 9 requires a credit reporter to provide the Commissioner with a report, prepared with the involvement of an independent person, which is to reflect the outcome of the credit reporter's systematic reviews undertaken under rules 5(2)(h) and 8(3)(f) and monitoring activities undertaken under rules 5(2)(e) and 8(3)(c) and to provide other assurances in relation to code compliance, as set out below.

Process of review and reporting

1. The report must include:
 - (a) a summary of the systematic review process and the methodology followed by the reviewer;
 - (b) where the report was prepared by a review committee, a statement identifying the members of that committee, including the independent person;
 - (c) information about the independent person's expertise; and
 - (d) confirmation that the independent person is not an employee, director, or owner of the credit reporter.

Assurances relating to policies, procedures, controls and subscriber agreements

2. The report must provide a reasonable assurance that, in relation to the applicable period, the credit reporter:
 - (a) had policies in place that give effect to the requirements of the code;
 - (b) had internal procedures and controls in place to give effect to the policies and requirements of the code;
 - (c) provided information and training to its staff to ensure compliance with the policies, procedures and controls; and
 - (d) ensured that subscriber agreements that complied with Schedule 3 were in place before disclosing credit information.

Assurances relating to monitoring of policies, procedures, controls and subscriber agreements

3. The report must provide a reasonable assurance that, in relation to the applicable period, the credit reporter undertook monitoring activities to ensure reasonable compliance with the code, including that:
 - (a) the credit reporter followed its own policies, procedures and controls;
 - (b) the information held by the credit reporter was protected by reasonable security safeguards;
 - (c) the credit reporter processed information privacy requests in accordance with rules 6 and 7;
 - (d) the credit reporter took such measures as were reasonably practicable to avoid the incorrect matching of information held by the credit reporter;
 - (e) the information held by the credit reporter was subject to reasonable checks to ensure that it was accurate, up to date, complete, relevant and not misleading;
 - (f) the credit reporter's reporting and retention of credit information was in accordance with rule 9 and Schedule 1;
 - (g) the credit reporter processed direct marketing lists in accordance with rule 10(1C);
 - (h) the credit reporter processed suppression, release or cancellation requests in accordance with Schedule 7;
 - (i) the credit reporter processed complaints in accordance with clause 8;
 - (j) the credit reporter's website displayed accurate information that gave effect to rules 6(4)(b), 7(4)(b), clause 8(3A) and clause 8.1 of Schedule 7; and
 - (k) subscribers complied with agreements and controls.

Assurances relating to action taken on deficiencies identified

4. The report must provide a reasonable assurance that, in relation to the applicable period:
 - (a) where, during its systematic reviews, monitoring activities or as a result of a complaint, the credit reporter identified a breach of an agreement, policy, procedure, control, or requirement of the code, the credit reporter investigated that breach and, where appropriate, took prompt remedial action; and
 - (b) where a deficiency was identified in the previous year's report, the credit reporter, where appropriate, took prompt remedial action.

Appendix 2

Paragraph 2.2: Additional Information about the independent person's expertise and independence

Ms Muller has never trained staff in, nor been engaged to assist at any stage with implementing, privacy policies or compliance programmes. She has not been involved in drafting or developing privacy policies for the last six years. Compliance implementation and training is managed by D&B's compliance team. For privacy matters, Yvonne does not report locally. Instead she reports to Katerina Paras, General Counsel in Dun & Bradstreet (Australia) Pty Ltd, who is responsible for compliance in Australia and New Zealand. A negative audit review by Yvonne or a discovery by her of shortfalls or inadequacies relating to privacy and in particular for the requirements of this Report would not impact on the terms of Yvonne's engagement by D&B as its independent person.