

# Data Protection Notice

The Bosch.IO Support platform (hereinafter “Bosch.IO” or “We” or “Us”) welcomes you to our internet pages and mobile applications (together also referred to as “Online Offers”). We thank you for your interest in our company and our products.

## Bosch.IO respects your privacy

The protection of your privacy throughout the course of processing personal data as well as the security of all business data are important concerns to us. We process personal data that was gathered during your visit of our Online Offers confidentially and only in accordance with statutory regulations.

Data protection and information security are included in our corporate policy.

## Controller

Bosch.IO is the controller responsible for the processing of your data; exceptions are outlined in this data protection notice.

Our contact details are as follows:

**Bosch.IO GmbH**  
Ullsteinstrasse 128  
12109 Berlin  
GERMANY

Mail: [privacy@bosch.io](mailto:privacy@bosch.io)  
Phone: +49 30 726112-0

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# Collection, processing, and usage of personal data

## Processed categories of data

The following categories of data are processed:

- Communication data (e.g., name, telephone, email, address, IP address)
- Contractual master data (e.g., contractual relationships, contractual or product interest)
- Client history
- Planning and regulation data

## Principles

Personal data consists of all information related to an identified or identifiable natural person, this includes, e.g., names, addresses, phone numbers, email addresses, contractual master data, contract accounting and payment data, which is an expression of a person's identity.

We collect, process and use personal data (including IP addresses) only when there is either a statutory legal basis to do so or if you have given your consent to the processing or use of personal data concerning this matter, e.g., by means of registration.

## Processing purposes and legal basis

We as well as the service providers commissioned by us; process your personal data for the following processing purposes:

- Provision of these online offers (Legal basis: fulfilment of contractual obligations. The following conditions apply: [https://assets.bosch.io/tos\\_en.pdf](https://assets.bosch.io/tos_en.pdf)).
  - Resolving service disruptions as well as for security reasons. (Legal basis: fulfilment of our legal obligations within the scope of data security and legitimate interest in resolving service disruptions as well as in the protection of our offers).
  - Self-promotion and promotion by others as well as market research and reach analysis done within the scope statutorily permitted or based on consent (Legal basis: Consent / legitimate interest on our part in direct marketing if in accordance with data protection and competition law).
  - Product or customer surveys by postal mail (Legal basis: Legitimate interest in the improvement of products / services).
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- Product or customer surveys performed via email and/or telephone subject to your prior express consent. (Legal basis: Consent).
- Safeguarding and defending our rights. (Legal basis: Legitimate interest on our part for safeguarding and defending our rights).

## Registration

If you wish to use or get access to benefits requiring to enter into the fulfilment of a contract, we request your registration. With your registration we collect personal data necessary for entering into the fulfilment of the contract (e.g. first name, last name, date of birth, email address, if applicable, details on the preferred payment method or on the account holder) as well as further data on voluntary basis, if applicable. Mandatory information is marked with an \*.

## Log files

Each time you use the internet, your browser is transmitting certain information which we store in so-called log files.

We store log files to determine service disruptions and for security reasons (e.g., to investigate attack attempts) for a period of one month and delete them afterwards. Log files which need to be maintained for evidence purposes are excluded from deletion until the respective incident is resolved and may, on a case-by-case basis, be passed on to investigating authorities.

In log files, the following information is saved:

- IP address (internet protocol address) of the terminal device used to access the Online Offer;
  - Internet address of the website from which the Online Offer is accessed (so-called URL of origin or referrer URL);
  - Name of the service provider which was used to access the Online Offer;
  - Name of the files or information accessed;
  - Date and time as well as duration of recalling the data;
  - Amount of data transferred;
  - Operating system and information on the internet browser used, including add-ons installed (e.g., Flash Player);
  - http status code (e.g., “Request successful” or “File requested not found”).
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## Children

This online offer is not meant for children under 16 years of age.

## Data transfer to other controllers

Principally, your personal data is forwarded to other controllers only if required for the fulfilment of a contractual obligation, or if we ourselves, or a third party, have a legitimate interest in the data transfer, or if you have given your consent. Particulars on the legal basis and the recipients or categories of recipients can be found in the section – **Processing purposes and legal basis**.

Additionally, data may be transferred to other controllers when we are obliged to do so due to statutory regulations or enforceable administrative or judicial orders.

## Service providers (general)

We involve external service providers with tasks such as sales and marketing services, contract management, payment handling, programming, data hosting and hotline services. We have chosen those service providers carefully and monitor them on a regular basis, especially regarding their diligent handling of and protection of the data that they store. All service providers are obliged to maintain confidentiality and to comply with the statutory provisions. Service providers may also be other Bosch group companies.

## Transfer to recipients outside the EEA

We might transfer personal data to recipients located outside the EEA into so-called third countries. In such cases, prior to the transfer we ensure that either the data recipient provides an appropriate level of data protection (e.g., due to a decision of adequacy by the European Commission for the respective country or due to the agreement based on so-called EU model clauses with the recipient) or that you have consented to the transfer. You are entitled to receive an overview of third country recipients and a copy of the specifically agreed to provisions securing an appropriate level of data protection. For this purpose, please use the statements made in the Contact section.

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## Duration of storage, retention periods

Principally, we store your data for as long as it is necessary to render our Online Offers and connected services or for as long as we have a legitimate interest in storing the data (e.g., we might still have a legitimate interest in postal mail marketing after fulfilment of our contractual obligations). In all other cases we delete your personal data with the exception of data we are obliged to store for the fulfilment of legal obligations (e.g., due to retention periods under the tax and commercial codes we are obliged to have documents such as contracts and invoices available for a certain period of time)

## Usage of Cookies

In the context of our online service, cookies and tracking mechanisms may be used. Cookies are small text files that may be stored on your device when visiting our online service. Tracking is possible using different technologies. In particular, we process information using pixel technology and/or during log file analysis.

## Categories

We distinguish between cookies that are mandatorily required for the technical functions of the online service and such cookies and tracking mechanisms that are not mandatorily required for the technical function of the online service.

It is generally possible to use the online service without any cookies that serve non-technical purposes.

## Technically required cookies

By technically required cookies we mean cookies without those the technical provision of the online service cannot be ensured. These include e.g. cookies that store data to ensure smooth reproduction of video or audio footage.

Such cookies will be deleted when you leave the website.

## Management of cookies and tracking mechanisms

You can manage your cookie and tracking mechanism settings in the browser and/or our privacy settings.

Note: The settings you have made refer only to the browser used in each case.

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## Deactivation of all cookies

If you wish to deactivate all cookies, please deactivate cookies in your browser settings. Please note that this may affect the functionality of the website.

## External Links

Our Online Offers may contain links to internet pages of third parties, in particular providers who are not related to us. Upon clicking on the link, we have no influence on the collecting, processing and use of personal data possibly transmitted by clicking on the link to the third party (such as the IP address or the URL of the site on which the link is located) as the conduct of third parties is naturally beyond our control. We do not assume responsibility for the processing of personal data by third parties.

## Security

Our employees and the companies providing services on our behalf, are obliged to confidentiality and to compliance with the applicable data protection laws.

We take all necessary technical and organizational measures to ensure an appropriate level of security and to protect your data that are administrated by us especially from the risks of unintended or unlawful destruction, manipulation, loss, change or unauthorized disclosure or unauthorized access. Our security measures are, pursuant to technological progress, constantly being improved.

## User Rights

To enforce your rights, please use the details provided in the Contact section. In doing so, please ensure that an unambiguous identification of your person is possible.

## Right to information and access

You have the right to obtain confirmation from us about whether or not your personal data is being processed, and, if this is the case, access to your personal data.

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## Right to correction and deletion

You have the right to obtain the rectification of inaccurate personal data. As far as statutory requirements are fulfilled, you have the right to obtain the completion or deletion of your data.

This does not apply to data which is necessary for billing or accounting purposes or which is subject to a statutory retention period. If access to such data is not required, however, its processing is restricted (see the following).

## Restriction of processing

As far as statutory requirements are fulfilled you have the right to demand for restriction of the processing of your data.

## Data portability

As far as statutory requirements are fulfilled you may request to receive data that you have provided to us in a structured, commonly used and machine-readable format or – if technically feasible – that we transfer those data to a third party.

## Objection to direct marketing

Additionally, you may object to the processing of your personal data for direct marketing purposes at any time. Please take into account that due to organizational reasons, there might be an overlap between your objection and the usage of your data within the scope of a campaign which is already running.

## Objection to data processing based on the legal basis of “legitimate interest”

In addition, you have the right to object to the processing of your personal data at any time, insofar as this is based on “legitimate interest”. We will then terminate the processing of your data, unless we demonstrate compelling legitimate grounds according to legal requirements which override your rights.

## Withdrawal of consent

In case you consented to the processing of your data, you have the right to revoke this consent at any time with effect for the future. The lawfulness of data processing prior to your withdrawal remains unchanged.

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## Right to lodge complaint with supervisory authority

You have the right to lodge a complaint with a supervisory authority. You can appeal to the supervisory authority which is responsible for your place of residence or your state of residency or to the supervisory authority responsible for us. This is:

### **Berliner Beauftragte für Datenschutz und Informationsfreiheit**

Friedrichstr. 219  
Visitors: Puttkamerstr. 16 – 18 (5. Etage)  
10969 Berlin  
Germany  
Phone: +49 30 13889-0  
Fax: + 49 30 2155050  
Email: [mailbox@datenschutz-berlin.de](mailto:mailbox@datenschutz-berlin.de)

## Changes to the Data Protection Notice

We reserve the right to change our security and data protection measures. In such cases, we will amend our data protection notice accordingly. Please, therefore, notice the current version of our data protection notice, as this is subject to changes.

## Contact

If you wish to contact us, please find us at the address stated in the "Controller" section.

To assert your rights and to notify data protection incidents please use the following link: <https://www.bkms-system.net/bosch-dataprotection>

For suggestions and complaints regarding the processing of your personal data we recommend that you contact our data protection officer:

### **Data Protection Officer Information Security and Privacy (C/ISP)**

Robert Bosch GmbH  
P.O. Box 30 02 20  
70442 Stuttgart, GERMANY  
or  
mailto: [DPO@bosch.com](mailto:DPO@bosch.com)

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## Information to be provided to data subjects in accordance with Art. 13

### GDPR – Joint controllers

#### What is the reason for the joint controllership?

Within the “Bosch.IO Support Platform” offering, the above named parties shall cooperate closely. This also applies to the processing of your personal data. The parties have jointly determined the order in which this data will be processed at each stage of the process. They are therefore considered joint controllers for the protection of your personal data within the process stages described below (Art. 26 DSGVO).

As a data subject within the meaning of the GDPR, you are entitled to the following information from the parties.

#### What did the parties agree upon?

As part of their joint controllership under data protection law, the above-mentioned parties have agreed which of them will fulfil the respective obligations under the GDPR. This applies in particular to the exercise of the rights of the data subjects (Art. 15 - 21 GDPR) and the fulfilment of the information duties pursuant to Art. 13 and 14 GDPR.

This agreement is necessary because the “Bosch.IO Support Platform” offering processes personal data in different process sections and systems operated by IO.

The implementation of the data protection obligations shall be carried out for the individual components of the processing activity according to the following model:

Processing Activity	Fulfilment of duties by
Registration	Bosch.IO und the parties
Support Ticket Processing	The parties
De-Registration	Bosch.IO
Fulfilment of individual privacy rights regarding the “Bosch.IO Support Platform”	Bosch.IO
Request Feedback via E-Mail	Bosch.IO and the parties

## What does this mean for you as a data subject?

Even if there is a joint controllership, the parties fulfil the data protection obligations according to their respective responsibilities for the individual processing activities as follows:

- Within the joint controllership both parties are responsible for the processing of personal data in the processing activities named above.
- Both parties shall make the information required under Articles 13 and 14 GDPR available to the data subjects in a precise, transparent, comprehensible and easily accessible form in clear and simple language and free of charge. Each party shall provide the other party with all necessary information from its sphere of activity.
- The parties shall inform each other immediately of any legal positions asserted by you as a data subject. They shall provide each other with all information necessary to respond to requests for information.
- As a data subject, you will always receive the information from IO. Irrespective of this internal regulation, you can assert your rights against any party directly.

## List of Parties

Name	Adresse
<b>Bosch.IO GmbH</b>	Bosch.IO GmbH Ullsteinstraße 128 12109 Berlin GERMANY
<b>Robert Bosch GmbH</b>	Robert Bosch GmbH Postfach 10 60 50 70049 Stuttgart GERMANY

**Effective date: 2022.11.21**

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