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## 1. Data Protection Notice

Robert Bosch GmbH (hereinafter "Bosch", "We" or "Us") is delighted about your visit to our internet pages and mobile applications (together also referred to as "Online Offers") and about your interest in our company and our products.

## 2. Robert Bosch GmbH respects your privacy

The protection of your privacy throughout the course of processing personal data as well as the security of all business data is an important concern 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.

## 3. Controller

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

Our contact details are as follows:

Robert Bosch GmbH Robert-Bosch-Straße 200 31139 Hildesheim

Board of management: Dr. Volkmar Denner, Dr. Stefan Asenkerschbaumer, Dr. Rolf Bulander, Dr. Stefan Hartung, Dr. Markus Heyn, Dr. Dirk Hoheisel, Christoph Kübel, Uwe Raschke, Dr. Werner Struth, Peter Tyroller

Chairman of the supervisory board: Franz Fehrenbach Registration court: Amtsgericht Stuttgart HRB 14000 VAT identification number: DE811128135 Your contact at Bosch: +49 (0)5121 49 5720 reparatur@de.bosch.com

## 4. Collection, processing and usage of personal data

## 4.1 Processed categories of data

The following categories of data are processed:

- Communication data (e.g. name, telephone, e-mail, address, IP address)
- Contractual master data (e.g. contractual relationships, contractual or product interest)
- Client history
- Contract accounting and payment data
- Transaction data
- Provision of information (from third parties, e.g. credit reference agencies or from public directories)

## **4.2 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 you have given your consent to the processing or use of personal data concerning this matter, e.g. by means of registration. The following data may be collected during registration:

- Address (which may include: street and house number, city, state, country code/country)
- Business Address (which may include: street and house number, city, state, country code/country)
- Company name and data
- Phone number (Home / Cellular / Business)
- Dealer ID and number
- Serial number
- Email address (Personal/Business)
- Fax number
- First, middle and last name
- IP Address
- Login name / username
- MAC Address
- Owner group number
- Password (Salt Format)
- Payment Transaction ID
- Preferred Language
- Password Recovery Question(s)
- Password Recovery Answer(s)
- OEM Customer Key
- Owner Group ID
- Admin Comments of customers
- User Preference
  - Attention
  - Opt out of receiving newsletters
  - Date of opt out of receiving newsletters
  - Opt out of third party newsletters
  - Date of opt out of third party newsletters
- Archive privacy policy acceptance and version number
- Active privacy policy acceptance and version number
- Subscription start and end date
- Name on Debit/Credit card
- Last for digits of Debit/Credit card
- Debt/Card expiration month and year
- Billing name
- Billing Address (which may include: street and house number, city, state, country code/country)
- Vehicle Identification Number (VIN)
- Time Zone
- Business Address (which may include: street and house number, city, state, country code/country)

- Billing phone number (Home/ Cellular / Business)
- Billing Fax number
- Shipping name
- Shipping Address (which may include: street and house number, city, state, country code/country)
- Shipping phone number (Home / Cellular / Business)
- Shipping Notes
- Order Authorization Transaction ID and code
- Shipping Tracking Number
- Tax Identifier and type
- License Key
- Software ID

## 4.3 Processing purposes and legal basis

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

#### 4.3.1 Online store with credit assessment

Provision of these Online Offers and fulfillment of contractual obligations under our contractual terms including invoicing and prior credit assessment. Invoicing may include the sale of claims.

(Legal bases: Fulfillment of contractual obligation respectively our justified interest in an efficient claims management and in avoiding claim defaults as regards the sale of claims and the credit assessment.

## **4.3.2** Providing Technical Support and Customer Service (Legal bases: Fulfillment of contractual obligations).

#### 4.3.3 Chat Board function

Answering user requests within the scope of a Chat Board.

(Legal basis: Fulfillment of contractual obligations or justified interest in the improvement of products / services).

# 4.3.4 Resolving service disruptions as well as for security reasons. (Legal basis: Fulfillment of our legal obligations within the scope of data security and justified interest in re-solving service disruptions as well as in the protection of our offers).

## 4.3.5 Advertisements and/or market research (including web analysis, not customer surveys)

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 / justified interest on our part in direct marketing if in accordance with data protection and competition law)

#### 4.3.6 Customer Surveys

Send product or customer surveys by postal mail

(Legal basis: Justified interest in the improvement of products / services). Note: In case we involve a market research institute for the purpose of surveys, it shall only act based on our instructions and follow our directives.

Send Product or customer surveys performed via email and/or telephone subject to your prior express consent. (Legal basis: Consent). Note: In case we assign a market research institute for the purpose of surveys, this institute will only act based on our Assignment, and will follow our directives.

#### 4.3.7 Raffles

Conducting raffles or discount campaigns in accordance with respective terms and conditions for raffles or discount campaigns. (Legal basis: Fulfillment of contractual obligations).

## 4.3.8 Newsletter (Email, SMS/MMS)

Sending an email or SMS/MMS newsletter subject to the recipient's consent. (Legal basis: Consent). Section 15.1. Newsletter with opt-in; Right of withdrawal.

## 4.3.9 Community

Operation of an online community for signed-in members for the purpose of [please amend purpose of community] (Legal basis: Fulfillment of contractual obligations).

### 4.3.10 Safeguarding and defending our rights.

(Legal basis: Justified interest on our part for safeguarding and defending our rights).

## 4.4 Registration

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

## 4.5 Log files

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

We save log files for a short time solely to determine disturbances and for security reasons (e.g., to clarify attack attempts) and then we delete them afterwards. Log files which need to be maintained for evidence purposes are excluded from deletion until the respective incident has been completely resolved and may, on a case-by-case basis, be passed on to investigating authorities.

Log files are also used for analysis purposes (without the IP address or without the complete IP address). Also see Section 12. Web Analysis.

In log files, the following information in particular is being saved:

- IP address (internet protocol address) of the terminal device used to access the Online Offers:
- Internet address of the website from which the Online Offer has been accessed (so-called URL of origin or referrer URL);
- Name of the service provider which is used to access the Online Offers;
- Name of the files or information accessed;
- Date and time as well as duration of retrieval:
- Amount of data transferred;
- Operating system and information on the internet browser used including addons;
- Installed (e.g., Flash Player);
- o Http status code (e.g., "Request successful" or "File requested not found").

#### 4.6 Children

This Online Offer is not for children under 16 years of age.

#### 5. Data transfer Data transfer to other controllers.

Principally, your personal data is forwarded to other controllers only if required for the fulfillment 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 can be found in the Section 4.3. Processing purposes and legal basis. Third parties may also be other companies of the Bosch group. When data is transferred to third parties based on a justified interest, this is explained in this data protection notice.

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.

## **5.2 Service providers**

We have commissioned external service providers with tasks such as sales and marketing services, contract management, payment handling, programming, services data hosting and hotline services. We have chosen these service providers carefully and review them regularly, especially regarding their diligent handling of and protection of the data that they have saved. All service providers are obliged to maintain confidentiality and to abide by the statutory provisions. Service providers may also be other Bosch group companies.

## **5.3 Payment service providers**

We involve external payment service providers.

Depending on the type of payment method you choose during the ordering process, we transfer the data used for the processing of payments (e.g. bank account or credit card data) to the financial institution charged with the payment or to payment service providers commissioned by us. Sometimes, payment service providers also collect and process such data as controllers. In that case (payment service providers are data controllers) the data protection notice or privacy policy of the respective payment service provider applies.

#### **5.4 Parcel announcements**

To announce your parcels, we transfer your email address and phone number within the scope of the fulfillment of the contract to:

General Logistics Systems Germany GmbH & Co. OHG Robert-Koch-Str. 46 55129 Mainz-Hechtsheim

Germany as well as DHL Paket GmbH Charles-de-Gaulle-Straße 20 53113 Bonn

Germany

This company processes data as a data controller.

## 6. Transfer to recipients outside the EEA

We can also transfer personal data to recipients located outside the EEA in so-called third countries. In such cases, we ensure prior to the transfer either that 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 Section 20. Contact.

## 7. Duration of storage; retention periods

Principally, we store your data for as long as it is necessary to render our Online Offers and the services connected to them or for as long as we have a justified interest in storing the data (e.g., we might still have a justified interest in postal mail marketing upon fulfillment of a contract). In all other cases we delete your personal data with the exception of data we must store to fulfill legal obligations (e.g., we are obliged due to

retention periods under the tax and commercial codes to have documents such as contracts and invoices available for a certain period of time).

## 8. Credit assessments

We have a justified interest in performing the credit assessments set forth in this section for the purpose to protect ourselves from bad debts or investments. We might commission companies performing mathematical and statistical analysis to assess the risk of payment default and deliver, within the scope of what is allowed under law, information on the probability of payment defaults. For the assessment, address data may be used, but not exclusively.

In case the result of a credit assessment does not satisfy our requirements, we reserve the right to ask for an assured payment method (e.g. credit card) or to refuse to enter into a contract.

A credit assessment is based on automated decision-making. If you disagree with the result, you may submit your point of view in writing to be reviewed by a case handler. In addition, you are entitled to find out about the essential reasons supporting the decision of the respective service provider.

We have commissioned the following service providers with credit assessments:

Creditsafe,
 Creditsafe, Schreiberhauer Straße 30, 10317 Berlin

## 9. Raffles or discount campaigns

In case you participate in one of our raffles or discount campaigns, we use your data to inform you about any prize won and for the purpose of advertising our products to the extent allowed by law or as far as you have consented. Information on raffles or discount campaigns can be found in the respective terms of participation.

## 10. Cookie usage

#### 10.1 General

Cookies are small text files that are being saved on your computer when an Online Offer is visited. In case you access this Online Offer another time, your browser sends the cookies' content back to the respective offer or/and, thus, allows the reidentification of the terminal device. Reading the cookies allows us to design our Online Offers optimally for you and makes it easier for you to use them.

### 10.2 Deactivation and deletion of cookies

When you visit our internet pages you will be asked in a cookie layer pop up whether you wish to allow the cookies which are being set on our page or you want to deactivate them in the settings.

In case you decide to block cookies, an opt-out cookie is set in your browser. This cookie exclusively serves the purpose of assigning your objection. Deactivating cookies may disable individual functions of our internet pages. Please note that an opt-out cookie may, for technical reasons, only be set for the browser that was used to set it.

In case you delete cookies or use a different browser or a different terminal device, you must opt out again. The preference setting does not apply to cookies that are being set during your visits on third party internet pages by other providers.

Your browser allows you to delete all cookies at all times. To do so, please consult your browser's help functions. This might, however, lead to individual functions no longer being available.

In addition, you are able to manage and deactivate the use of third party cookies on the following web page:

http://www.youronlinechoices.com/uk/your-ad-choices.

As we do not operate this website, we are not responsible and we are unable to influence content and availability.

## 11. Overview of Cookies Used by us

In this section, please find an overview of cookies we use.

#### 11.1 Absolutely necessary cookies

Certain cookies are necessary so we can securely render our Online Offers. This category includes, e.g.:

- Cookies that identify or authenticate our users;
- Cookies that authorize a user (roles and features)
- Cookies that temporarily save certain user input (e.g., content of a shopping cart or of an online form);
- Cookies that store certain user preferences (e.g., search country or language settings); Cookies that store data to ensure a trouble-fee playback of video or audio content.

## 11.2 Analytical cookies

We use analytical cookies to record the usage behavior (e.g., ad banners clicked, search queries put in) of our users and to evaluate it statistically.

#### 11.3 Convenience Cookies

Cookies that store social media preferences.

#### 11.4 Statistics Cookies

- Cookies that remember statistical data like number of this etc.;
- Cookies that are used to increase the data quality of the statistics functions;
- Cookies that are used for anonymization of statistical data.

## 11.5 Targeting Cookies

 Cookies that help to tailor information and advertising to your interests based on e.g. the content you have visited before.

## 12. Web analysis

We need statistical information about the usage of our Online Offers to design them to be more user-friendly, to perform range measurements, and to perform market research.

For this purpose, we use the web analysis tools described in this section.

The usage profiles created by these tools using analysis cookies or by evaluating log files do not contain personal data. The tools either do not use user IP addresses at all or shorten them immediately after gathering them.

The tools offer process data only as processors subject to our directives and not for their own purposes.

In the following, please find information on each tool offer or/and how you are able to object to the collection and processing of data through the tool.

Be advised that with regard to tools which use opt out cookies, the opt-out function is related to a device or browser and is thus valid for the terminal device or browser used at this time. In case you use several terminal devices or browsers you must opt out on every device and with every browser used.

Beyond this, you can generally avoid the forming of usage profiles by generally deactivating cookie usage; for this please refer to the Section 10.2. Deactivate and delete cookies.

## 12.1 WebTrends

WebTrends is provided by WebTrends Inc., 851 SW 6th Ave., Suite 1600, Portland, Oregon 97206, USA. You may object to the collection or processing of your data by using the opt-out possibility by clicking the following link:

https://ondemand.webtrends.com/support/optout.asp

## **12.2 Google Analytics**

Google Analytics is provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). We use Google Analytics with the additional function offered by Google to anonymize IP addresses. While doing so, Google already shortens IPs within the EU in most cases but only does so for exceptional cases in the United States, and in both regions it only saves shortened IP's. You may object to the collection or processing of your data by using the following link to download and install a browser plugin:

http://tools.google.com/dlpage/gaoptout?hl=en.

## 13. Social Sign In (Login via social network)

We offer you the possibility to sign into our Online Offers by so-called social sign in such as Facebook Connect and Twitter.

To register, you are forwarded to the respective social network's page where you can sign on with your data. This means that your account with the respective network is linked to our service. In doing so, information from your public profile, your email address and the identification tags of your network friends, as well as, if applicable, further data is transmitted to us through the social network.

In turn, the social network used for the registration receives your login status, browser information and your IP address. The social network's provider or its server may be located outside the EU or the EEA (e.g. in the United States).

If you do not wish data transfer taking place between us and the social network services, log in via our own log in services instead of social log in services.

## 14. YouTube

Our Online Offers use the YouTube video platform which is operated by YouTube, LLC, 901 Cherry Ave. San Bruno, CA 94066, USA ("YouTube"). YouTube is a platform which allows the playback of audio and video files.

When you access a respective site of our Online Offers that contains an embedded YouTube player, this creates a connection to YouTube so that the video or audio file can be transmitted and played back. In doing so, data is transferred to YouTube as a data processor. We are not responsible for the processing of such data by YouTube.

Additional information on the scope and purpose of collected data, on further processing and usage of data by YouTube, on your rights and the privacy options available to be chosen by you, can be found in YouTube's data protection notice.

## 15. Newsletter

## 15.1 Newsletter with opt-in; Right of withdrawal

Within the scope of our Online Offers you are able to sign up for newsletters. To do so, we use the so -called double opt-in procedure which means that we will only send you a newsletter via email, mobile messenger (such as, e.g., WhatsApp), SMS or push notification after you have explicitly confirmed the activation of the newsletter service to us by clicking the link in a notification. In case you wish to no longer receive newsletters at a later date, you can terminate the subscription at any time by withdrawing your consent. You can withdraw your consent to email newsletters by clicking the link which is sent in the respective Online Offer email, as the case may be. You can also withdraw your consent by logging to website and navigating to my profile section. This occurs in the administrative settings. Alternatively, please contact us using the contact details provided in Section 20. Contact.

### 16. External links

Our Online Offers may contain links to third party internet pages – by providers who are not related to us. Upon clicking the link, we have no influence on collecting, processing and using personal data possibly transmitted by clicking 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 behavior of third parties is naturally outside our supervision. We do not assume responsibility for the processing of such personal data by third parties.

## 17. 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.

## 18. User rights

To enforce your rights, please use the details provided in section 20. Contact. 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.

**Right to correction and deletion**: You have the right to obtain the rectification of inaccurate personal data concerning yourself without undue delay from us. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

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:** You have the right to demand for – as far as statutory requirements are fulfilled – restriction of the processing of your data.

**Objection to data processing:** You have the right to object to data processing by us at any time. We will no longer process the personal data unless we demonstrate compliance with legal requirements to provide provable reasons for the further processing which are beyond your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

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

Withdrawal of consent: In case you consented to the processing of your data, you have the right to object this consent with immediate effect. The legality of data processing prior to your revocation remains unchanged.

## **18.1** Data portability

You are entitled to receive data that you have provided to us in a structured, commonly used and machine-readable format or – if technically feasible – to demand that we transfer those data to a third party.

## **18.2** Right of 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 or to the supervisory authority responsible for us. This is:

The state Commissioner for data protection in Lower Saxony

Barbara Thiel

Address:
Prinzenstraße 5
30159 Hannover

P.O. Box: 2 21 30002 Hannover Tel.: 05 11/120-45 00 FAX: 05 11/120-45 99

Email: poststelle@lfd.niedersachsen.de

## 19. Changes to the Data Protection Notice

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

## 20. Contact

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

To assert your rights and for suggestions and complaints regarding the processing of your personal data as well as for the withdrawal of your consent, we recommend that you contact our group commissioner for data protection:

Mr. Matthias Goebel Group Commissioner for Data Protection Information Security and Privacy Bosch Group (C/ISP) Robert Bosch GmbH Kronenstrasse 20 70173 Stuttgart

or

mailto:Abteilungsbriefkasten.cisp@de.bosch.com.

## 21. Effective date: **2018.05.01** Version **1.0**