

# Data Protection Notice

Bosch Thermotechnology UK Ltd (hereinafter "Worcester Bosch" 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.

## Worcester Bosch respects your data protection

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.

## Controller

Worcester Bosch 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 Thermotechnology Ltd., Cotswold Way, Warndon, Worcester, WR4 9SW, UNITED KINGDOM, Tel.: +44 330 123 9339

## Processing of personal 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 process 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.

### Processed categories of data

The following categories of data are processed:

- Communication data (e.g. name, telephone, e-mail, address)
- Contractual master data (e.g. contractual relationships, contractual or pro-duct interest, Kundennummer)
- Client history

- Contract accounting and payment data
- Planning and regulation data
- Transaction data
- Training- and qualification history
- Product and installation information (e.g. installation address, serial number, type of device, date of installation),
- Technical and connection data (e.g. IP address, data of the internet connection)
- Login credentials (e.g. id, username)
- Settings (e.g. language, time zone)
- Storage
- Messages
- Information regarding your GDPR data subject request (e.g. type of request, information regarding your identity and/or communication details)

## **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 this Online Offer (Legal basis: Art. 6 para. 1 subpara. 1 lit. b GDPR, fulfillment of contractual obligations).
- Invoicing in accordance with our contractual terms (Legal basis: Art. 6 para. 1 subpara. 1 lit. b GDPR, fulfillment of contractual obligation).
- Credit assessment prior to the fulfillment of contractual obligations and invoicing (Legal basis: Art. 6 para 1 subpara. 1 lit. f DS-GVO, our legitimate interest in avoiding loss of receivables).
- Sale of claims (Legal basis: Art. 6 para 1 subpara. 1 lit. f DS-GVO, our legitimate interest in an efficient claims management).
- Resolving service disruptions as well as for security reasons. (Legal basis: Art. 6 para. 1 subpara. 1 lit. f GDPR, fulfillment 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 your expressed consent (Legal basis: Art. 6 para. 1 subpara. 1 lit. a, lit. f GDPR, consent or legitimate interest on our

part in direct marketing if in accordance with data protection and competition law. To the extent required by law, contact for marketing purposes shall only be made subject to your prior consent).

- Product or customer surveys by postal mail (Legal basis: Art. 6 para. 1 subpara. 1 lit. f GDPR, legitimate 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.
- Product or customer surveys performed via email and/or telephone subject to your prior express consent. (Legal basis: Art. 6 para. 1 subpara. 1 lit. a GDPR, consent). 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.
- Conducting discount campaigns in accordance with respective terms and conditions for discount campaigns. (Legal basis: Art. 6 para. 1 subpara. 1 lit. b GDPR, fulfillment of contractual obligations).
- Sending an email or SMS/MMS newsletter subject to the recipient's consent (Legal basis: Art. 6 para. 1 subpara. 1 lit. a GDPR, consent).
- Safeguarding and defending our rights. (Legal basis: Art. 6 para. 1 subpara. 1 lit. f GDPR, legitimate interest on our part for safeguarding and defending our rights).
- To fulfill our duty of product surveillance and for product safety. (Legal basis: art. 6 para. 1 subpara. 1 lit. f GDPR, our legitimate interest to warrant the safety of our products).
- To safeguard our rights in connection with warranty and product registration questions. (Legal basis: our legitimate interest according to art. 6 para. 1 subpara. 1 lit. f GDPR).
- To provide the core functionality of products connected with the Internet. (Legal basis: art. 6 para. 1. subpara. 1 lit. b GDPR).
- To analyze the distribution of our products and to provide individualized information and offers related to the product. (Legal basis: art. 6 para. 1 subpara. 1 lit. f GDPR, our legitimate interest to perform direct marketing in connection with profiling)
- Collection, planning and conducting of customer services. (Legal basis: art. 6 para. 1 subpara. 1 lit. b GDPR, contract)
- for quality tests and quality improvement purposes. (Legal basis: art. 6 para. 1 subpara. 1 lit. f GDPR, our legitimate interest to improve our products and services)

## **Obligation to Provide Personal Data**

Please note, in the event, that a contract was concluded between you and us, you are obliged to provide us with those personal data, which are required for the conclusion, enforcement,

termination of the contract as well as for the fulfilment of contractual obligations connected with the contract or of those we are legally obliged to process. Without the provision of these data, we will not be able to conclude, execute or terminate a contract.

In the event, the data processing is required neither by law nor for the conclusion, execution or termination of a contractual relationship or the fulfilment of contractual obligations, the provision of your data is optional. Please note, some functions of our Online Offers or our services cannot be used, if you do not provide us with the usage required personal data.

## **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 Three (3) months 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 accessing device;
- 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 transmission;
- 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 not found”).
- Size of transmitted data;

## **Children**

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

## **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 and the recipients or categories of recipients can be found in the Section -Processing, purposes and legal bases. 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.

### **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 to the statutory provisions. Service providers may also be other Bosch group companies.

### **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 please note (payment service providers are data controllers) the data protection notice or privacy policy of the respective payment service provider.

### **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.

### **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 fulfillment 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 fulfillment 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).

## **Discount campaigns**

In case you participate in one of our 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 discount campaigns can be found in the respective terms of participation.

## **External links**

Our Online Offers may contain links to third party internet pages – by 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.

### **Right to correction and deletion:**

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

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 based on the legal basis of “legitimate interest”:**

You have the right to object to data processing by us on grounds relating to your particular situation, 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 as well as herewith related profiling at any time ("Objection to direct marketing"). 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.

### **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.

### **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.

### **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:

The Information Commissioner's Office  
Water Lane, Wycliffe House  
Wilmslow - Cheshire SK9 5AF  
Tel. +44 1625 545 700  
email: [casework@ico.org.uk](mailto:casework@ico.org.uk)  
Website: <https://ico.org.uk>

## **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.

## **Exercise of your rights and contact information**

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

To assert your rights or to report a data protection breach please follow this [link](#).

You can contact us as well under:

[privacy.ttg@bosch.com](mailto:privacy.ttg@bosch.com)

Data Protection Officer:

Data Protection Officer, Information security and Data security (C/ISP), Robert Bosch GmbH, Postcode 30 02 20 in 70442 Stuttgart, Germany.