

# Privacy Policy

Robert Bosch GmbH (hereinafter "Bosch" or "we" or "us") respects your privacy.

The protection of your privacy when processing personal data, as well as the security of all business data, is an important concern, which we consider with our business processes. We process personal data confidentially and always in line with statutory provisions.

Data protection and information security are part of our corporate policy.

## Responsible

Bosch is responsible for the processing of the data submitted to us; exceptions are set forth in this privacy notice.

Our contact information is as follows: Robert Bosch GmbH, AA-AS/NE4, Franz-Oechsle-Straße 4, 73207 Plochingen, Germany. E-mail: mailbox.diagnostics@de.bosch.com

## Collection, processing and use of personal data

### Processed data categories

The following data categories are processed:

- Your customer login credentials to the licencing portal (your customer number at Bosch and the respective password)
- Contract master data (contractual relationship, interest in product and/or contract)
- System information of the diagnostic device (e.g. hardware equipment, operating system, device detection)
- Usage data of this licence software (e.g. history information of completed download and installation procedures)

## Basic principles

Personal data includes all information that is related to an identifiable or unidentifiable natural person, i.e. for example, names, addresses, phone numbers, e-mail addresses, data related to contracts, bookings and settlements, which express a person's identity.

We collect, process and use personal data (incl. IP addresses) only if there is statutory basis to do so, or if you have given your consent regarding this matter.

## **Purpose of processing and legal bases**

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

- Display of an overview of your licensed products and contracts to facilitate your selection of software to be downloaded

(legal basis: fulfilment of contract)

- Management and load distribution of download processes, improvement of licence software and our connected services

(legal basis: fulfilment of contract).

- Identification of interferences and due to safety reasons

(legal bases: fulfilment of our legal obligations regarding data protection and justified interest in eliminating interferences and in safeguarding our offers).

- Protecting and defending our rights

(legal basis: justified interest on our part to enforce and defend our rights).

## **Log files**

Every time data is transmitted via the Internet, certain information is transferred automatically and stored by us in so-called log files.

We store the log files for a certain amount of time to identify interferences and due to safety reasons (e.g. to solve hacking attacks) and are then deleted. Log files that must be stored for proof are exempt from being deleted until the respective incident has been clarified entirely and can be passed on to investigation services in individual cases.

The following information is stored in the log files:

- IP address (internet protocol address) of the end device from which the online offer was accessed;
- name of called-up files and/or information;
- date and time as well as duration of the visit;
- transmitted amount of data;
- operating system and information reg. the used Internet browser incl. installed add-ons (e.g. for the Flash Player);
- http status code (e.g. "Request successful" or ""requested file not found").

## **Data disclosure**

## **Data disclosure to other responsible persons**

We only disclose your personal data to other responsible persons if this is necessary to fulfil the contract, if we or the third party has a justified interest in the disclosure, or if you have given your consent to the disclosure. Find details reg. the legal bases in the section "Purpose of processing and legal bases". "Third parties" may also include other companies of Bosch Group. If data is transmitted to third parties based on a justified interest, it is explained in this privacy notice.

Furthermore, data may be disclosed to other responsible persons if we are obliged to do so due to statutory provisions or enforceable regulatory and/or judicial orders.

## **Service providers (general)**

We contract external service providers for contractual management, programming, data hosting and hotline services. We have selected these service providers carefully and monitor them on a regular basis, especially with view to their carefully handling and securing data saved there. We oblige all service providers working to maintain secrecy and comply with statutory provisions. "Service providers" may also include other companies of Bosch Group.

## **Disclosure to recipients outside of the EEA**

We can also disclose personal data to recipients that are located outside of the EEA, in so-called third-countries. In this case, we verify beforehand that the recipient either makes use of an appropriate data protection level (e.g. due to an adequacy decision by the EU Commission for the respective country or the agreement of so-called standard contractual clauses by the European Union with the recipient), or that your consent reg. the disclosure is available.

You may request from us an overview of the third country recipients and a copy of the agreed regulations reg. the safeguarding of an appropriate data privacy level. To do so, please use the information set forth in the "Contact" section.

## **Duration of data storage; retention periods**

As a rule, we save your data for as long as it is necessary to fulfil the contract, resp., we have a legitimate interest in further saving this data (e.g. we still might have a legitimate interest in postal marketing after the expiration of the contract).

In all other cases, we delete your personal data, unless we must keep saving it to fulfil legal obligations (e.g. tax and commercial law retention periods oblige us to maintain documents, such as contracts and invoices, for a certain period).

The following applies in particular:

- We delete your customer login credentials to the licencing portal at the latest after ....
- We delete system information of the diagnostic device as well as user data of this licence software at least 1 year after the contract has been terminated.

## Safety

Our employees and the service companies commissioned by us are obliged to maintain secrecy and comply with the provisions of the applicable data protection acts.

We implement all necessary technical and organisational measures to guarantee an appropriate level of protection, and to protect your data managed by us especially against risks regarding unintentional or illegal destruction, manipulation, loss, modification or unauthorised disclosure and/or access. Our security measures are continually being improved according to the technological development.

## User rights

To enforce your rights, please use the information set forth in the "Contact" section. Please make sure that we can clearly identify you.

- **Right to information:**  
You are entitled to receive information from us reg. the processing of your data. To do so, you may enforce a right to information reg. your personal information processed by us.
- **Right of rectification and deletion:**  
You may request from us the rectification of wrongful data, and completion, resp., deletion of your data, provided that the respective statutory prerequisites are fulfilled. This does not apply to data that is necessary for billing and accounting purposes or is subject to the statutory retention period. However, if accessing this data is not necessary, its processing will be limited (see below).
- **Limitation to data processing:**  
You may request from us to limit the processing of your data, provided that the statutory prerequisites are fulfilled.
- **Objection to data processing:**  
You also have the right to object to us processing your data at any time. We will then cease processing your data, unless we are able to prove in line with legal provision that there are compelling legitimate reasons for the continuation of processing your data, which would overrule your rights.
- **Objection against direct marketing:**  
You are furthermore entitled at any time to object against the processing of your personal data for marketing purposes ("Objection to marketing"). Please note that due to organisational reasons, your cancellation and the use of your data within the

framework of an already ongoing campaign may overlap.

- **Objection to data processing on legal basis of "justified interest:**  
You also have the right to object to us processing your data at any time provided that this is subject to the legal basis of justified interest. We will then cease processing your data, unless we are able to prove in line with legal provision that there are compelling legitimate reasons for the continuation of processing your data, which would overrule your rights.
- **Consent to revoke:**  
If you have given your consent to process your data, you may revoke this consent at any time with effect for the future. The legitimacy of processing your data will stay unaffected until the revocation.
- **Data portability:**  
You are furthermore entitled to receive data provided to us in a structured, common and machine-readable format, resp., to request having the data sent to a third party if this is technically feasible.
- **Right to file complaint with a supervisory authority:**  
You have the right to file complaint with a data protection authority. To do so, you may contact the data protection authority responsible for your place of residence, resp. your state, or the data protection authority responsible for us. This is:

The Federal Commissioner for Data Protection and Freedom of Information

Street address: Königstrasse 10a, 70173 Stuttgart, Germany

Postal address: PO Box 10 29 32, 70025 Stuttgart, Germany

Phone: +49 711 615541 0

Fax: +49 711 615541 15

E-mail: [poststelle@lfdi.bwl.de](mailto:poststelle@lfdi.bwl.de)

## **Change to this Privacy Policy**

We reserve the right to change our safety and data protection measures if this is necessary due to technical developments. In these cases, we will also adapt our privacy policies. Therefore, please always observe our latest version of our privacy policy.

## **Contact**

To get in contact with us, please use the address provided in the "Responsible" section.

To enforce your rights as well as for suggestions and complaints regarding the processing of your personal data as well as for revoking your consent, we recommend contacting our Group Data Protection Officer:

Mr  
Matthias Goebel  
Group Data Protection Officer  
Data security and data protection Bosch-Group (C/ISP)  
Robert Bosch GmbH  
Kronenstraße 22  
70173 Stuttgart  
Germany

E-mail: [Abteilungsbriefkasten.cisp@de.bosch.com](mailto:Abteilungsbriefkasten.cisp@de.bosch.com)

**As at: 2018-05-01**