

## Data privacy statement for the Bosch Secure Truck Parking Portal

Bosch Service Solutions GmbH (hereinafter "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.

### 1. Bosch 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.

### 2. Controller

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 Service Solutions GmbH, Lahnstraße 34-40, 60326 Frankfurt, Germany, e-mail: [info.bso@de.bosch.com](mailto:info.bso@de.bosch.com), Phone +44 151 2373200

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

#### 3.1. 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.

#### 3.2. Processed categories of data

The following categories of data are processed:

- Contract data
- Reservation and parking information, as well as identification media (e.g. license plate)
- Contract and parking history
- User and communication data (e.g. name, phone, e-mail, address, contact partner)
- Billing and payment information
- Information (from third parties, such as information services or from public directories)



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### **3.3. Processing purposes and legal bases**

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

- To answer user inquiries (Legal basis: Fulfillment of contractual obligations and fulfillment of measure precedent to the contract)
- To provide this Online Offer and to fulfill the contract on the basis of our contract [terms and conditions](#), including billing and, where appropriate, [Credit assessments](#). Billing can also include the sale of receivables. (Legal basis: Fulfillment of contractual obligations and respectively our justified interest in an efficient claims management as regards the credit assessments and sale of claims)
- Resolving service disruptions as well as for security reasons (Legal bases: Fulfillment of our legal obligations within the scope of data security, and justified 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 bases: Consent/justified 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: Justified interest in the improvement of products / services)
- Product or customer surveys performed via email and/or telephone subject to your prior express consent. (Legal basis: 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 raffles or discount campaigns in accordance with respective terms and conditions for raffles or discount campaigns. (Legal basis: Fulfillment of contractual obligations)
- Distribution of a newsletter with the consent of the recipient by e-mail (Legal basis: )
- Sending an email newsletter subject to the recipient's consent (Legal basis: Consent)
- Safeguarding and defending our rights (Legal basis: Justified interest on our part for safeguarding and defending our rights)

### **3.4. 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, address, telephone number, e-mail 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 \*.



### **3.5. Log files for website usage**

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

We save log files for a short period of time to determine service disruptions and for security reasons (e.g. to investigate attack attempts) 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, in particular 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").

### **3.6. Portal actions log files**

Log information is stored in so-called log files whenever the portal and the services and functions are made available.

The log files will be used by us solely to document use (log files, whose further retention is necessary for documentation purposes are exempted from the deletion up to the final clarification of the respective incident and can be passed on to investigating authorities in individual cases).

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

- Time of login
- Logged user
- Creation, implementation and alteration of parking processes with date and time
- Changes to authorizations with date and time
- Changes to user and customer data with date and time

### **3.7. Children**

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

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

#### **Claims management**

We reserve the right to have claims collected by external service providers.

Additionally, we have a legitimate interest in selling claims to third parties and in transferring data necessary for the collection of the claim to the respective buyer of the claim. During claim collection, claim buyers act in their own name and are themselves responsible for processing the data. In this respect, the data protection notices of the respective claim buyer apply.

### **3.9. 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.

Current recipients in third countries:

Robert Bosch Engineering and Business Solutions Private Limited, Bangalore, India

### **3.10. 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 justified interest in storing the data (e.g. we might still have a justified 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).

## **4. Credit assessments**

We may carry out a credit assessment if your parking transactions exceed a certain monthly volume.

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:

CRIF Bürgel GmbH, Radlkofenstraße 2, 81373 Munich, Germany



## **5. 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.

## **6. Use of cookies**

### **6.1. General information**

Cookies are small text files that are saved on your computer when an Online Offer is accessed. In case you access this Online Offer another time, your browser sends the cookies' content back to the respective seller and, thus, allows the re-identification 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.

### **6.2. Deactivation and deletion of cookies**

When you visit our Internet pages, you will be asked in a cookie-layer pop-up whether you want to allow the cookies placed by us, and to continue using our Online Offers.

However, you can delete all cookies via your browser at any time. For this purpose, please refer to the help functions of your browser. However, this can also mean that certain functions will no longer be available to you.

In addition, the following website allows the use of cookies to be administered and disabled by third parties:

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

This website is not operated by us, so we are not responsible and have no influence on its content or availability.

### **6.3. Overview of the cookies used by us**

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

#### **Absolutely necessary cookies**

Certain cookies are necessary to provide our Online Offers in a secure manner. This category includes:

- cookies that identify or authenticate our users;
- cookies that temporarily save certain input of the user (e.g. the content of an online form);
- cookies that store certain user preferences (e.g. save search or language settings for the session).

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## 7. Google Maps

We use Google Maps API from Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043, USA ("Google") to visualize geographical information. When Google Maps is used, information may be processed about your use of the relevant functions. These servers may be located outside the EU. For more information about data processing by Google, please refer to Google's Privacy Policy at the following link <http://www.google.com/privacypolicy.html>

## 8. reCAPTCHA

We use the reCAPTCHA service from Google for selected input fields for security reasons. With reCAPTCHA these inputs are verified to ensure that they have been made by humans and not automated by so-called bots. Your IP address and any other data required for this review will be transferred to Google's servers. These servers may be located outside the EU. For the transferred data, Google's privacy policy applies, which can be viewed under the following link <https://www.google.com/intl/en/policies/privacy/>.

## 9. Newsletter

Within the scope of our Online Offers you can sign up for newsletters. We shall make this subject to your consent, for example in the context of your registration. We only send you a newsletter via e-mail after you have used the sent login data to log into the portal or after you have explicitly confirmed the activation of the newsletter service to us by clicking on the link in a notification.

In case you wish to no longer receive newsletters, you can terminate the subscription at any time by withdrawing your consent. You can withdraw your consent to email newsletters by clicking on the link which is sent in the respective newsletter mail. Alternatively, please contact us via the contact details provided in the [Contact](#) section.

## 10. 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 supervision. We do not assume responsibility for the processing of personal data by third parties.

## 11. 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.



## **12. 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 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 at any time, insofar as this is based on a justified interest. We will then terminate the processing of your data, unless we demonstrate compelling legitimate grounds according to legal requirements which override your rights.



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**Withdrawal of consent:**

In case you consented to the processing of your data, you have the right to revoke this consent with immediate effect. The legality of data processing prior to your revocation 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 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 of residency or to the supervisory authority responsible for us. This is:

State Commissioner for Data Protection and Freedom of Information Baden-Württemberg

Address:

Königstrasse 10a  
70173 Stuttgart, GERMANY

Postal address:

P.O. Box 10 29 32  
70025 Stuttgart, GERMANY

Phone: +49 711 615541-0

Fax: +49 711 615541-15

Email: [poststelle@lfdi.bwl.de](mailto:poststelle@lfdi.bwl.de)

**13. 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, notice the current version of our data protection notice, as this is subject to change.

**14. Contact**

If you wish to contact us, please find us at the address stated in the "[Controller](#)" section.

To assert your data subject requests and notification of data protection incidents please use following link: <https://www.bkms-system.net/bosch-datenschutz>

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



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Mr.  
Matthias Goebel  
Group Data Protection Office  
Information Security and Data Protection for the Bosch Group (C/ISP)  
Robert Bosch GmbH  
Kronenstrasse 22  
70173 Stuttgart, GERMANY

or

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

As at: 24<sup>th</sup> May 2018