

# **Data Protection Notice (OpenDXM GlobalX)**

The Bosch Group (hereinafter "BOSCH" or "We" or "Us") welcomes you to our internet pages (also referred to as "Online Offers"). We thank you for your interest in our company and our products.

# **Terminology**

DA data exchange

Odette-Partner External DA partners that do not use the application

Internet-User External DA partners that use the application

External DA-Partner Odette-Partner + Internet-User.

Internal DA-Partner Bosch-internal users of the application.

DA-Partner external + internal DA-Partners.

# **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 are important concerns to us. We process personal data that you have given us to use our Online Offers confidentially and only in accordance with statutory regulations.

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

#### Controller

The legal entity of the Bosch Group with which you exchange data is the controller responsible for the processing of your data. Robert Bosch GmbH processes the data on behalf of the respective Bosch legal entity. Exceptions are outlined in this data protection notice.

Our contact details are as follows:

Robert Bosch GmbH Robert-Bosch-Platz 1 70839 Gerlingen-Schillerhöhe GERMANY

# Collection, processing and usage of personal data

# Processed categories of data

The following categories of data are processed:

Communication data:

name, first name, business phone number, business email address, company name, department, company location)

For Internet-Users in addition: User-ID

For Odette-Partners in addition: Address code



#### **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 bases

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 for Odette-Partners: Justified interest on our part to address you and to be able to send data to you as long as this occurs in accordance with data protection and competition law).
  - (Legal basis for Internet-Users: Fulfillment of contractual obligations).
- ▶ Operation of the data exchange platform OpenDXM for identification, selection and notification of the sender / recipient. Where:
  - Internal DA-Partners can see all DA-partners and select them as recipients.
  - Internet-User can only see internal DA-partners and select them as recipients.
  - (Legal basis: Fulfillment of contractual obligations).
- Resolving service disruptions as well as for security reasons.
   (Legal basis: 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).
- Safeguarding and defending our rights.
   (Legal basis: Legitimate interest on our part for safeguarding and defending our rights).

# Registration (only for Internet-Users)

With your registration via your BOSCH business partner we collect personal data necessary for entering into the fulfillment of the contract (first name, last name, email address) as well as further data on voluntary basis, if applicable (company name, company location, department, business phone number). Mandatory information is marked with an \*.

# Registration (only for Odette-Partners)

For registration, we collect personal data (last name, first name, email address, routing address, and company name) from the data transfer jobs or from address lists sent to us for labeling senders / receivers of data transfer jobs.



#### Log Files (only for Internet-Users)

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 maximum of 30 days 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;
- ▶ http status code (e.g., "Request successful" or "File requested not found")

#### 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 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 and the recipients or categories of recipients can be found in the section – <u>Processing purposes and legal bases</u>. 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 programming, hotline services and error analysis. 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 can see or 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 either that the data recipient provides an appropriate level of data protection 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- 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 the data transfer transaction 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 product liability we are obliged to have documents such as engineering data and their transfer available for a certain period of time).

# **Usage of Cookies**

In the context of our online service, cookies may be used.

Cookies are small text files that may be stored on your device when visiting our online service.

### 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.

In this Online Offer, we only use technically required cookies.

# 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 identify or authenticate our users.

Such cookies will be deleted when you leave 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 <u>Contact</u> 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. 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 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 a "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.

#### 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:

State Commissioner for Data Protection and Freedom of Information

Address:

Lautenschlagerstraße 20 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

### **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 change.

#### 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

## **Effective date:**

2021.07.19