
**WEBSITE PRIVACY POLICY
WORCESTER BOSCH**

We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us in the event you have a complaint.

This policy applies to:

- (i) all those who visit our website, mobile applications, such as the My Worcester App, or who have had face to face contact with one of our employees;**
- (ii) business customers (including Worcester Bosch accredited installers and other installers); and**
- (iii) consumers (including homeowners)**

to that extent relevant to those individuals and except where the policy indicates otherwise.

Our 'Group' refers to the constituent companies of Robert Bosch GmbH.

1. WHO WE ARE

Bosch Thermotechnology Limited trading as the brands known as Worcester, Bosch Group and Bosch Commercial and Industrial Heating ("We") collect, use and are responsible for, certain personal information about you ("personal data"). We are a data controller under data protection law which includes the Data Protection Act 1998 and the General Data Protection Regulation 2016 as appropriate.

2. BOSCH RESPECTS YOUR PRIVACY

The protection of your privacy in the processing of your personal data is an important concern, which we pay special attention to during our business operations. We use ("process") your personal data collected during your visit to our website and when you provide your personal data to us in other ways, in a confidential manner and solely in accordance with the law including the General Data Protection Regulation ("GDPR").

3. THE PERSONAL DATA WE COLLECT AND USE

Information collected by us

If you are a consumer (including homeowners)

We may collect your personal data when you provide it to us through our website, if you write to us or telephone our offices or if you provide your details to us through a third party (including through a Worcester Bosch accredited installer or other professional installer). Your information may be provided to us in the following ways:

- if you contact us to register the guarantee for your boiler (or other product)

- if you contact our Customer Services Department, Technical Hotline, or other team at Worcester Bosch to make a request for a product service appointment, enquire about our products and services, including our service plans, or to provide feedback to us on our products and services;
- your details may be passed to us by the installer who installed your product

The personal data which we collect about you may include your name, postal address, your email address, contact telephone number, credit card details and details of any comments or feedback which you provide to us.

If you are a business customer

We may collect your personal data when you provide it to us through our website or 'My Worcester' app or when you purchase products or make enquiries about our products and services, enter a competition, register to use our website or join our installer reward scheme. We may collect this information directly through the website or app or if you provide your details over the telephone, or by post.

We may collect your name, billing address, delivery address details, your email address, date of birth, gender, contact telephone number, Gas Safe or other industry accreditation reference number, and details of any comments or feedback which you or a third party provides to us.

We may also require your credit card details. We will use this information to supply you with the products and services, such as training, to recover debt and to help us prevent fraud. We process credit card payments through *BT Buynet*

We may also collect and process records of any correspondence and communications with us and a record of transaction history and details of transactions conducted on our site or through our app is kept by us together with details of the fulfilment of any order. Cookies will collect a certain amount of data - we use the information within cookies to display re-marketing advertising on third party websites to consumers that did not complete a purchase

We may receive personal information about you from other sources such as stockists of our products, from consumers who register their products with us and from third parties who work with us in connection with our sites and services. We may also obtain your personal data through third parties such as the Gas Safe Register of if you or your employer or educational provider submits your details in connection with one of our training courses. Third-party service providers may, without limitation, be appointed to provide technical support, process your transactions and maintain your accounts or to run promotions or marketing campaigns. We may have access to any personal information provided to such vendors, service providers and third party e-commerce services.

We may monitor, record, store and use any telephone, email or other communication you provide in order to check any instructions given to us, for training purposes, for crime prevention and to improve the quality of our customer service.

What other information do we collect?

As you move around our site, subject to appropriate consents being obtained, we will collect information about your visit, such as which pages you visit, how often you visit and what links you click on.

This will include technical information such as Internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, operating system and platform and information about your visit such as the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number. To improve the services we provide, we also use Google Analytics to provide data for the above mentioned activity as well as general site performance and usage statistics. Please refer to our Cookie Policy

We may also receive information about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that personal data that it may be shared internally and combined with personal data collected on this site for the purposes set out in this policy, including helping us to build a profile of you to get to know you better, and so that we can personalise and enhance your customer experience with us.

4. HOW DO WE USE YOUR PERSONAL INFORMATION?

Information you give to us.

We will use this information:

- to carry out our obligations arising from any agreements entered into between you and us and to provide you with the information, products and services that you request from us;
- to carry out appropriate and necessary investigations and discharge our legal and regulatory obligations and duties, including to comply with anti-fraud and anti-money laundering requirements;
- to send you a welcome email to verify your account when you register with the site and other emails for the purposes of providing any services, products, competitions or promotions to you, including in relation to account management or system maintenance;
- to provide you with marketing information about other services or products we offer that are similar to those that you have already purchased, or services or products you have

consented to receiving on the site or; to notify you about changes to our services and/or products;

- build a profile of you, your preferences and your habits in order to personalise and enhance your customer experience; to provide customer support; and/or
- to ensure that content from the site is presented in the most effective manner for you and for your computer.

We may use the personal data we collect about you on an anonymised basis to create statistics and anonymised information which we then share with third parties including ad networks, search engines and analytics providers.

Please note we will not use any financial or credit card information for any purpose other than to discharge our legal / regulatory duties and to process payments paid by you for our products and services or due to you by agreement (e.g. refunds).

Information we collect about you.

We will use this information:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to carry out appropriate and necessary investigations and discharge our legal and regulatory obligations and duties, including to comply with anti-fraud and anti-money laundering requirements, and (where applicable) to safeguard our staff and other customers / users in respect of unlawful, disruptive or objectionable behaviour on our premises or on our website;
- to improve our website to ensure that content is presented in the most effective manner for you and for your computer;
- to enhance our website experience to ensure you receive a personalised and continuously improving customer service;
- to allow you to participate in interactive features of our website, when you choose to do so;
- as part of our efforts to keep our website safe and secure;
- to deliver (whether directly or indirectly via third parties) effective and personalised marketing material and content of Bosch Thermotechnology Limited and where you have consented, other companies within our Group and to assist us in the improvement and optimisation of advertising, marketing material and content, our services and the sites;

- o to measure, understand or monitor the effectiveness of advertising, promotions, marketing material and content and any joint initiatives with our affiliates, suppliers, partners, subcontractors and other selected third parties;
- o build a profile of you, your preferences and your habits;
- o to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you where permitted; and/or
- o to make suggestions and recommendations to you and other users of our site or services about goods or services that may interest you or them.

Information we receive from other sources.

We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

5. USING YOUR INFORMATION IN ACCORDANCE WITH DATA PROTECTION LAWS

Data protection laws require that we meet certain conditions before we are allowed to use your data in the manner described in this privacy policy. We take our responsibilities under data protection laws extremely seriously, including meeting these conditions. To use your personal data, we will rely on the following conditions, depending on the activities we are carrying out:

- Compliance with legal obligations: As an entity established under the laws of England and Wales, Bosch Thermotechnology Limited is obliged to comply with UK laws and guidance provided by UK regulatory bodies. In particular, we will need to process your personal data to verify your identity, establish your age, verify your source of funds for anti-money laundering and fraud purposes, and to establish whether you have been barred from any stores which stock our products or from using our site due to objectionable behaviour. We are also legally obliged to process your personal data in accordance with gas safety regulations. You will not be able to object to processing or ask for the deletion of your personal information insofar as it falls under this category.
- Necessary for the entry into / performance of a contract: When you enter into a transaction with us, a contract between you and us will have been entered into. In order for us to fulfil our obligations under such contract (e.g. to allow you to purchase goods from us), we will need to collect and process your personal data. Failure to provide the requisite personal information on sign-up and financial information on entering into the transaction or objecting to this type of processing / exercising your deletion rights will unfortunately mean we cannot provide our goods / services to you.

- Consent: We may send you marketing messages by email, text message or telephone about us and our products and offers where you have not unsubscribed and where you have purchased products or other services from us. We may also send you information by post on the products and services which we provide which we believe may be of interest to you. We provide easy ways to stop our marketing, and you can opt out at any time by updating your preferences on our Opt-in page (link) or selecting the 'unsubscribe' (link) on any email we send you

If you are not a customer of ours but you have provided us with consent to use your details for marketing purposes, then we may also contact you about our products and services.

If you have confirmed that you would like to hear from us about other the products and services of other companies in the Bosch Group then we will use your details to contact you with marketing information about such products and services.

If you have confirmed that you would like to hear directly from other members of our Group about such party's products and services then we will share your details with such third party so they can contact you about their products and services

In each of the situations above, you have the right to withdraw your consent at any time and can object to processing of this nature. Where you consent to us sending you marketing information, we will treat this as lasting for 12 months unless we tell you otherwise at the time.

- Legitimate interests: To use your personal data for any other purpose described in this privacy policy, we will rely on a condition known as "legitimate interests". It is in our legitimate interests to collect your personal data as it provides us with the information that we need to provide our services to you more effectively. This requires us to carry out a balancing test of our interests in using your personal data (for example, in order to provide you with the information, products and services that you request from us), against the interests you have as a citizen and the rights you have under data protection laws (for example, to not have your data sold to third party marketing companies without your knowledge, or not store your personal data in insecure or unstable countries or regions). The outcome of this balancing test will determine whether we can use your personal data in the ways described in this privacy policy. We will always act reasonably and give full and proper consideration to your interests in carrying out this balancing test.

6. **HOW LONG WE KEEP YOUR INFORMATION FOR**

When your data is no longer required for the purposes listed above, we will delete it within the periods set out below:

Marketing consents will be refreshed/deleted after 12 months (60 Months for Commercial & Industrial projects) or can be withdrawn at any time (see Clause 5);

Marketing emails and other communications where possible will typically be deleted after 24 months

Any other information will typically be deleted within 15 years from the date of our last positive interaction with you. This data is archived where customers are inactive for a period of 12 months. In some circumstances, some of your data will be deleted in much shorter timescales, where possible (e.g. copies of marketing emails and other communications). We keep your personal information for 15 years, to enable us to retain the information we may require for legal and regulatory purposes.

7. **MARKETING**

We want to keep you informed about all our products, promotions and news, and where you have indicated you are happy to receive marketing by email, SMS or phone we will keep in touch with the latest news. We may also send you relevant information on products and services which we think may be of interest to you - you can easily opt out of this at any time by contacting as indicated below.

If you are an existing customer, we will contact you by e-mail, SMS, post or phone with information about products and services similar to those which you have already purchased from us.

If you have not made a purchase from us, and where we permit other companies in the Bosch Group to use your data, we (or they) will contact you with marketing if you have consented to this.

We may also send updates and marketing from the other companies in our Group about their products, promotions and news to you on their behalf where you have consented to this.

If you prefer not to continue to receive promotional or marketing information from us or from the other companies in our Group, please use the unsubscribe function in the information we send you or alternatively write to our Data Security Officer using the contact details in section 15.

8. **DISCLOSURES**

We may disclose your personal data to any member of our Group (being our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006).

We will only share your personal information with other members of our Group for marketing purposes where you have expressly opted-in/consented to the disclosure of your personal data for these purposes.

We will only disclose your information to:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you; e.g. service providers who operate elements of our site service

and process personal data on our behalf. These may include businesses who provide technology services such as hosting for our servers and email distribution, and business partners who provide delivery fulfilment services. We may also disclose your personal data to our supply and delivery partners for the purpose of processing and fulfilling your order. Where such disclosures are made, this will be under contractual arrangements with us and carried out in accordance with the requirements of data protection law.

- members of our Group and third party suppliers and service providers for the purposes listed under *How do we use your personal information?* above;
- third party suppliers and service providers to the extent they assist our Group with its legal / regulatory obligations e.g. providers of services in respect of anti-money laundering, fraud, verification etc.;
- selected third parties so that they can contact you with details of the services that they provide, where you have expressly opted-in/consented to the disclosure of your personal data for these purposes;
- analytics and search engine providers that assist us in the improvement and optimisation of our site and other selected third parties such as DPR; and
- your employer, educational institution (e.g. school, college or university), email or internet provider, parents (if you are under the age of 18) or law enforcement agencies, or other appropriate third parties, where we consider your behaviour to be unlawful, offensive, inappropriate or objectionable in one of our training facilities;

We will disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- in the event of any insolvency situation (e.g. the administration or liquidation) of Bosch Thermotechnology Limited or any of its Group;
- if Bosch Thermotechnology Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- to protect the rights, property or safety of us, our staff, our customers, or others. This includes exchanging information with other companies and organisations (including without limitation, other third parties, your employer, educational institution, email or internet provider, your parents (if you are under the age of 18) and law enforcement agencies) for the purposes of staff and customer safety, crime prevention, fraud protection and credit risk reduction; and

- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation or regulatory requirements or in order to enforce or apply our terms of use and other agreements, or otherwise for the prevention or detection of fraud or crime.
- In assessing your request for goods or services, we may use your personal data for the purposes of the prevention and detection of fraud. One of the purposes for which we may disclose your address and postcode details is to check against the IMRG Security Alert or any other Fraud Prevention Scheme. At all times where we disclose your personal data it will remain secure.

9. **WHERE WE STORE YOUR PERSONAL DATA**

The personal data that we collect from you is stored on secure information technology systems located in the EEA which are operated by us or on our behalf by third parties. Some data processing in relation to web and email services and delivery of any products ordered by you is carried out on our behalf by a third party. Where Google Analytics are used, the data may be stored outside of the EEA. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this privacy policy and data protection law.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our site; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

10. **PROTECTING YOUR INFORMATION**

Our site uses up-to-date industry procedures to protect your personal information. We also protect the security of your data during transmission using Secure Sockets Layer (SSL) encryption software. We may vary this in the future if we feel you will benefit from greater security whilst using our site.

We have appropriate security measures in place in our physical facilities to protect against the loss, misuse or alteration of information that we have collected from you via our site. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Cookies

Our site uses cookies, as almost all websites do, to help provide you with the best experience we can. For more information, please see our Cookies Policy ([link](#))

11. **THIRD PARTY SERVICES**

Bosch websites may contain links to third-party websites operated by providers that are not associated with us. After you click the link, we no longer have any influence over the collection,

storage, or processing of any personal data transmitted by clicking the link (such as IP address or URL of the page that contains the link), as the behaviour of third parties is, by nature, beyond our control.

Please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

12. **YOUR RIGHTS**

You have a number of rights under data protection law in relation to the way we process your personal data, although these are not absolute and in some instances, we may be unable to accept your request, in which case we will respond to you to explain why. These are set out **below**. You may contact us using the details on our site (or by contacting us directly – details **below**) to exercise any of these rights and we will respond to any request received from you within one month from the date of the request.

NUMBER	DESCRIPTION OF RIGHT
Right 1	A right to access personal data held by us about you.
Right 2	A right to require us to rectify any inaccurate personal data held by us about you.
Right 3	A right to require us to erase personal data held by us about you. This right will only apply where (for example): we no longer need to use the personal data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your personal data based on your consent; or where you object to the way we process your data (in line with Right 6 below).
Right 4	In certain circumstances, a right to restrict our processing of personal data held by us about you. This right will only apply where (for example): you dispute the accuracy of the personal data held by us; or where you would have the right to require us to erase the personal data but would prefer that

our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose we collected it for, but we require the data for the purposes of dealing with legal claims.

Right 5 In certain circumstances, a right to receive personal data, which you have provided to us, in a structured, commonly used and machine readable format. This right will only apply where the processing is based on consent or a contract (see above) and the processing is carried out by automated means. You also have the right to require us to transfer this personal data to another organisation, at your request.

Right 6 A right to object to our processing of personal data held by us about you where the processing of such data is necessary for the purposes of our legitimate interests, unless we are able to demonstrate, on balance, legitimate grounds for continuing to process personal data which override your rights or which are for the establishment, exercise or defence of legal claims.

Right 7 A right for you not to be subject to a decision based solely on an automated process, including profiling, which produces legal effects concerning you or similarly significantly affect you.

Right 8 A right to withdraw your consent, where we are relying on it to use your personal data (for example, to provide you with marketing information about our services or products).

13. **UPDATING YOUR INFORMATION**

If you believe your details are incorrect you can amend your details by contacting us at the address provided below.

14. **CHANGES TO OUR PRIVACY POLICY**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

This policy was last reviewed and updated: May 2018

15. **CONTACT**

If you have any questions, comments or requests regarding this Privacy Policy, we will be happy to answer them. Please contact

**Data Protection Officer
Robert Bosch UK Holdings Ltd.
Broadwater Park
North Orbital Road
Denham
UB9 5HJ**

or

DSO@uk.bosch.com

Please address any questions, comments and requests regarding our data processing practices to us in this way in the first instance.

Please remember to include your name, address and postcode along with any correspondence reference you may have

If you have any concerns regarding our processing of your personal data, or are not satisfied with our handling of any request by you in relation to your rights, you also have the right to make a complaint to the Information Commissioner's Office. Their address is:

**First Contact Team
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF**