

# Data Protection Notice

eAcademy UK (hereinafter "eAcademy UK" 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.

## eAcademy UK 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

eAcademy UK 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 (844) 892 3000

## 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
- 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)
- System data (e.g. events, errors, online data, sensor values, service forecasts)
- Login credentials (e.g. id, username)
- Settings (e.g. language, time zone)
- Product registration data (e.g. details of installer, date of registration)
- Device identifier (e.g. serial numbers, device ID)
- Contacts
- Calendar entries
- Storage
- Audio records
- Messages
- Call log
- 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 these Online Offers (Legal basis: Art. 6 para. 1 subpara. 1 lit. f GDPR, legitimate interest on our part in direct marketing but only to the extent permitted by data protection and unfair competition law).
- Invoicing in accordance with our contractual terms (Legal basis: Art. 6 para. 1 subpara. 1 lit. b GDPR, fulfillment of contractual obligation).
- 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).
- 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)

## 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 183 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:

## 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.

### **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).

# Usage of Cookies

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

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

Tracking is possible using different technologies. In particular, we process information using pixel technology and/or during log file analysis.

## 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.

It is generally possible to use the online service without any cookies that serve non-technical purposes.

## 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 store data to ensure smooth reproduction of video or audio footage.

Such cookies will be deleted when you leave the website.

## Cookies and tracking mechanisms that are technically not required

We only use such cookies and tracking mechanisms if you have given us your prior consent in each case. We distinguish between two sub-categories with regard to these cookies and tracking mechanisms:

### Marketing cookies and tracking mechanisms

#### General

By using marketing cookies and tracking mechanisms we and our partners are able to show you offerings based on your interests, resulting from an analysis of your user behaviour:

- **Statistics:** By using statistical tools, we measure e.g. the number of your page views.
- **Conversion tracking:** Our conversion tracking partners place a cookie on your computer ("conversion cookie") if you accessed our website via an advertisement of the respective partner. Normally these cookies are no longer valid after 30 days. If you visit certain pages of our website and the cookie has not yet expired, we and the relevant conversion partner can recognize that a certain user clicked on the advertisement and thereby was redirected to our website. The information obtained by means of the conversion cookie serves the purpose of compiling conversion statistics

and recording the total number of users who clicked on the respective advertisement and were redirected to a website with a conversion tracking tag.

Please note that using the tools might include transfer of your data to recipients outside of the EEA where there is no adequate level of data protection pursuant to the GDPR (e.g. the USA). For more details in this respect please refer to the following description of the individual marketing tools.

## **Management of cookies and tracking mechanisms**

You can manage your cookie and tracking mechanism settings in the browser and/or our privacy settings.

Note: The settings you have made refer only to the browser used in each case.

## **Deactivation of all cookies**

If you wish to deactivate all cookies, please deactivate cookies in your browser settings. Please note that this may affect the functionality of the website.

## **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 administered 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, Informationssicherheit und Datenschutz (C/ISP), Robert Bosch GmbH, Postfach 30 02 20 in 70442 Stuttgart, Germany.