



Bosch IoT Suite

Data protection notice

Data Protection Notice

Bosch.IO GmbH (hereinafter “Bosch.IO“ or “We“ or “Us”) welcomes you to our Bosch IoT Suite portal and internet pages (together also referred to as “Online Offers”). We thank you for your interest in our company and our products.

Important Notice for California residents: We have updated our Data Protection Notice to provide supplemental details regarding certain rights provided under the California Consumer Privacy Act (CCPA) for consumers in California. Please find here our [California Privacy Rights/Privacy Policy](#).

Bosch.IO 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 collected 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

Bosch.IO 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.IO GmbH
Ullsteinstrasse 128
12109 Berlin
Germany
privacy@bosch.io
+49 30 726112-0

Collection, processing and usage of personal data

Processed categories of data

The following categories of data are processed:

- Communication data (e.g. name, telephone, e-mail, address, IP address). E-Mail address is required to sign up. Other personal data, such as first name, last name, company name and address, phone number are optional for subscribing to free service plans. When subscribing to paid service plans, company information (e.g. name, location, city, tax id) is required for billing purposes.
- Contractual master data (e.g. contractual relationships, contractual or product interest). We collect information from marketplaces where free and paid service plans are ordered. In general, we collect: order information (start and end time of contract), product (service, service plan, instance name).
Depending on marketplace, we collect and process the following information:
 - AWS Marketplace: Pseudonymized company identifier, city, state, country and domain of email address of your AWS account.
 - Bosch IoT Marketplace: Pseudonymized company identifier, technical user identifier (Bosch ID).
- Contract accounting and payment data: company information (e.g. name, location, city, tax id), product and technical service usage (e.g. bandwidth, storage)

- Transaction data: Time of login, timestamp, viewed web page and your IP address when accessing the website. Your IP address is kept temporarily in webserver access logs for. For long-term traffic and visitor analysis, we only use masked IP addresses.

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 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: Fulfillment of contractual obligations. The following conditions apply: <https://bosch-iot-suite.com/legal/> (Portal Terms of Use, SaaS Terms and Conditions, SaaS Service Level Agreement, SaaS Data Processing Under Commission, Terms and Conditions for evaluating Gateway Software)
- Resolving service disruptions as well as for security reasons.
Legal basis: 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 basis: Consent / justified interest on our part in direct marketing if in accordance with data protection and competition law.
- Registration for usage of services offered on our website.
Legal basis: Justified interest on our part to execute the services and administration of justified interest of third parties and fulfillment of contractual obligations if relevant for the offered services.
- Safeguarding and defending our rights.
Legal basis: Justified interest on our part for safeguarding and defending our rights.

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, date of birth, email address*, if applicable, contact details on the account holder*) as well as further data on voluntary basis, if applicable. Mandatory information is marked with an *.

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 up to 90 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.

Log files are also used for analysis purposes (without the IP address or without the complete IP address) see module “Advertisements and/or market re-search (including web analysis, no customer surveys)”.

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 (e.g., Flash Player);
- 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

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 basis.

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

We involve external service providers with tasks such as contract management, payment handling, and data. 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 with the statutory provisions. Service providers may also be other Bosch group companies.

Transfer to recipients outside the EEA

When subscribing to one or more services of the Bosch IoT Suite, personal data (such as IP Address and E-Mail address) may be processed by other recipients outside the EEA according to the terms specified in our [SaaS Terms and Conditions and Data Processing Under Commission Agreement](#).

In such cases, prior to the transfer we ensure that either 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 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

General

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 user login and authorization information for single-sign on purposes. Such cookies will not be deleted when you leave the website.

Cookies and tracking mechanisms that are technically not required

We only use cookies and tracking mechanisms if you have given us your prior consent in each case. With the exception of the cookie that saves the current status of your privacy settings (selection cookie). This cookie is set based on legitimate interest.

Marketing cookies and tracking mechanisms

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 behavior:

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. This can also be done across multiple devices. 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.

Retargeting:

These tools create user profiles by means of advertising cookies or third-party advertising cookies so called “web beacons” (invisible graphics that are also called pixels or tracking pixels), or by means of comparable technologies. These are used for interest-based advertising and to control the frequency with which the user looks at certain advertisements. The relevant provider is the controller responsible for the processing of data in connection with the tool. The providers of the tools might disclose information also to third parties for the purposes mentioned above. Please note the data protection notices of the relevant provider in this context.

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.

Name: Google Analytics

Provider: Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

Function: Analysis of user behavior (page retrievals, number of visitors and visits, downloads), creation of pseudonymous user profiles based on cross-device information of logged-in Google users (cross-device tracking), enrichment of pseudonymous user data with target group-specific information provided by Google, retargeting, UX testing, conversion tracking and retargeting in conjunction with Google Ads

Name: Google Tag Manager

Provider: Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

Function: Administration of website tags via a user inter-face, integration of program codes on our websites

Name: Google Ads

Provider: Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

Function: Placement of advertisements, remarketing, conversion tracking

Further information is available at: <https://adssettings.google.com/authenticated>

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.

Management of your settings with regard to cookies and tracking mechanisms not required technically

When visiting our websites, you will be asked in a cookie layer whether you consent to our using of any Comfort cookies, marketing cookies or tracking mechanisms, respectively.

In our privacy settings, you may withdraw the consent with effect for the future or grant your consent at a later point in time.

YouTube

Our Online Offers use the YouTube video platform which is operated by YouTube, LLC, 901 Cherry Ave. San Bruno, CA 94066, USA („YouTube“). YouTube is a platform which allows the playback of audio and video files.

When you access a respective site of our Online Offers that contains an embedded YouTube player, this creates a connection to YouTube so that the video or audio file can be transmitted and played back. In doing so, data is transferred to YouTube as a data processor. We are not responsible for the processing of such data by YouTube.

Additional information on the scope and purpose of collected data, on further processing and usage of data by YouTube, on your rights and the privacy options available to be chosen by you, can be found in YouTube’s data protection notice.

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. The external links deposited on our sites can i.a. also refer to services like Twitter, LinkedIn, Facebook etc.

Newsletter

Newsletter with opt-in; Right of withdrawal

Within the scope of our Online Offers you can sign up for newsletters. We provide the so-called double opt-in option which means that we will only send you a newsletter via email 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, or in the administrative settings of the online offer. Alternatively, please contact us via the contact details provided in the Contact section.

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 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. 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 have the right to demand for 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 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 “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.

Login with SingleKey ID

You can log in using SingleKey ID.

SingleKey ID was developed by Bosch.IO GmbH for the Bosch Group to provide users with a universal login option on Bosch websites, stores, apps and services. Bosch.IO GmbH, Ullsteinstrasse 128, 12109 Berlin, Germany, is responsible for providing SingleKey ID.

The provider of SingleKey ID at Bosch.IO GmbH processes your data for the purposes of “Registration and Login with SingleKey ID” and “Overview and Maintenance of master data and applications with SingleKey ID” under joint responsibility with other application owners (see Joint Controllers section). For more information, please visit also the [SingleKey ID data protection notice](#).

To use SingleKey ID for log in, you need to register once. For this you will be redirected to a login mask of the provider. After successful authentication, the provider of SingleKey ID will transmit to Bosch IoT Suite the required personal data (e.g., e-mail address, telephone number, first name, last name, language, country). Your password will not be transmitted.

You can terminate your SingleKey ID user agreement at any time on the SingleKey ID website by deleting your account using the following [link](#).

Please note that by deleting your SingleKey ID you will lose access to all Bosch websites, stores, apps and services where you have logged in using SingleKey ID.

Joint controllers

Information on joint responsibility with regard to data subjects, according to Art. 26(2)(2) GDPR

Party 1: Bosch.IO GmbH, Ullsteinstrasse 128, 12109 Berlin, Germany

and

Party 2: All parties named in the list of parties

What is the basis for joint responsibility?

In connection with the provision of SingleKey ID as an exclusive single sign-on solution of the Bosch Group, the aforementioned parties will work closely together. This also concerns the processing of your personal data. The parties have jointly determined the order in which this data is processed in individual process steps. As such, they are jointly responsible for the protection of your personal data during the process stages described below (Art. 26 GDPR).

As a data subject according to GDPR, you have a right to the following information from the aforementioned parties.

For which process stages is there joint responsibility?

- Processing step: Registration and login with SingleKey ID
- Responsibility lies with: Bosch.IO GmbH

- Processing step: Overview and administration of master data and applications with SingleKey ID
- Responsibility lies with: Bosch.IO GmbH

What have the parties agreed?

In line with their joint responsibility for data protection, the aforementioned parties have agreed which of them is responsible for meeting specific obligations under GDPR. In particular, this concerns the exercise of the rights of data subjects (Art. 15–21 GDPR) and the fulfillment of the obligations regarding provision of information (Art. 13–14 GDPR).

This agreement is required because during the provision and operation of SingleKey ID and its functions, personal data is processed in various process steps and by various systems operated either by Bosch.IO GmbH or by all parties named in the list of parties.

What does this mean for you as data subject?

Although a joint responsibility exists, the parties shall fulfill the obligations under data protection law in accordance with their respective responsibilities for the individual processing activities as follows:

- In accordance with their joint responsibility, the parties shall provide the data subject with any information required under Art. 13 and 14 GDPR in a precise, transparent, intelligible, and easily accessible form, using clear and plain language. This information shall be provided free of charge. For this purpose, each party shall provide the other party with all the necessary information from its area of operation.
- The parties shall inform each other without delay of any legal positions asserted by you as data subject. They shall provide each other with all the information required to respond to requests for information.
- As data subject, you will, in principle, receive the information from Bosch.IO GmbH. Regardless of this internal agreement, you may also assert your rights, as data subject, directly against any party.

Who are the contracting parties?

All Bosch entities that have signed the Adherence Letter to the Joint Controller Agreement are referred to as contracting parties.

The current list of parties is published on the SingleKey ID website under <https://singlekey-id.com/en/data-protection-notice/>.

Every iteration of the list of parties and the date of potential changes can be requested directly from Bosch IO GmbH.

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.

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.

Changes to the Data Protection Notice

We reserve the right to change or update our security measures and privacy policy in order to adapt it to technical development, legal situation changes or changes needed by the service or data processing.

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/bkwebanon/report/clientInfo>

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 Bosch Group (C/ISP)
Robert Bosch GmbH
Postfach 30 02 20
70442 Stuttgart
GERMANY

or
send an email to DPO@bosch.com

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Bosch IoT Suite

<https://bosch-iot-suite.com/>
<https://www.bosch-digital.com/>

Imprint

Name and address

Bosch.IO GmbH
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Board of management

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Telephone number

+49 30 726112-0

E-mail address

info@bosch.io

Registrations

District Court Charlottenburg, HRB 148411 B

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