

Data protection information for the Home Connect app

The company Home Connect GmbH, with its registered office at Carl-Wery-Strasse 34, 81739 Munich, Germany (hereinafter "Home Connect" or "we") is responsible for the collection, processing and use of your personal data associated with the Home Connect app (hereinafter "App").

We collect, process and use your personal data in accordance with the applicable data privacy laws. The following information explains how we treat such data.

1. Types of personal data

In terms of App usage, Home Connect collects, processes and uses primarily the following types of personal data.

a. User master data

The data we collect and use when setting up a user account (registration) are as follows:

- Details that you provide during the registration process, such as:
 - first and last name,
 - email address (user ID),
 - the country in which you operate your household appliance(s),
 - password as access protection.

The details requested as part of the registration process may differ from country to country.

- Information which we collect and store during the registration process:
 - language setting of your mobile device,
 - consent to and recognition of the terms of use and acknowledgement of the data protection information,
 - status of the user account (activated/deactivated),
 - default app tracking setting (depending on the country selection, see item 6 below for more information).

b. Appliance master data

The data we collect and use concerning the connection between your household appliance and the user account are as follows:

- brand of the household appliance (e.g. Bosch or Siemens),
- serial number and, if applicable, manufacture date of the appliance (so-called E number (full model) and FD (production) number – you can also find these details on the device label),
- the unique identifier of the network adapter installed in the household appliance (so-called MAC address).

These data are allocated to your user account for each connected household appliance under the "Home Connect" function.

c. Appliance usage data

The data we collect and use in relation to the usage of the household appliance are as follows:

- selected basic settings, program selection and preferred program settings on the household appliance or via the App,
- appliance status data such as ambient conditions, condition of parts, changes in appliance status (e.g. different mode of operation, open or closed doors/front panel, temperature changes, fill levels) and appliance status messages (e.g. appliance is overheated, water tank is empty, etc.).
- Video and image data (e.g. refrigerators with built-in camera)

d. **App usage data**

App usage data are data generated by your interaction with the App, such as the features you use, click behaviour relevant to App controls, drop-down menu selections, on/off switch settings. See item 6 for more information.

2. **Intended uses**

We use the above-mentioned types of data

- to provide App features as well as the services offered via the App (1.a.-c.),
- to fix bugs (1.b. and c.),
- to improve the App's user friendliness (1.d.),
- to improve our range of products and services, especially with regard to programs which are not used and/or which are frequently used, besides other App and household appliance features (1.c. and d.), and
- for direct marketing purposes (1.a.-c.).

The legal bases for the intended data uses in the scope of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 are described in item 12 of this information.

3. **General storage periods**

Provided there are no statutory provisions to the contrary, the following general storage periods shall apply:

- User master data:** Deletion as soon as the user account is deleted.
- Appliance master data:** Removal of link to the user account upon removing the household appliance from the user account.
- Appliance usage data:** User-specific storage for a period of ten (10) days. Should the user have consented to permission marketing, user-specific storage for the duration of validity of such permission marketing.
- App usage data:** Storage in pseudonymised form to the extent that the "Enable usage-data tracking" function is activated. App usage data is stored for a maximum duration of 37 months from the date on which it was collected.

4. **Data processing management**

a. **Connectivity of your household appliance**

You can use the App to manage household appliance connectivity:

- If required, you can set up the connection to the Home Connect server in such a way that each household appliance is connected separately (menu item *Settings* → *Connectivity settings*). After doing this:
 - the appliance usage data (1.c.) will no longer be transmitted to the Home Connect server,
 - certain App features will no longer be available; in particular the household appliance can then not be operated outside the reach of the WiFi connection, even if an internet data link is set up.
- If required, you can switch off the WLAN connection for an individual household appliance (menu item *Settings* → *Connectivity settings*). After doing this:
 - the appliance usage data (1.c.) will no longer be transmitted to the Home Connect server,
 - the household appliance may only be operated from the appliance itself, not via the App.

b. User accounts and local App data

You can manage your user accounts via the App and delete locally stored App data.

- You can delete your user account ("*Settings*" → "*My account*" → "*Delete user account*"). After doing this:
 - the connection between your household appliance and your user account will be deleted,
 - your household appliance will no longer send any appliance usage data to the Home Connect server provided no other user accounts are linked to the household appliance (see item 1.b. above).
- Deleting the App also removes all locally stored user-specific data.

c. The household appliance's factory settings

You can reset your household appliance to its factory settings. After doing this:

- the household appliance will lose its connection to the Home Connect server due to the network settings being reset,
- the household appliance will no longer be linked to any previously associated user account (requires the household appliance to be connected to the Internet) and it will not be displayed in the App.

Please read your household appliance's user manual before restoring the factory settings.

5. Transmission or disclosure of your data to third parties

We work together with various service providers to create and run the App and provide the respective services. To the extent that we have bound these service providers to process data in line with strict instructions in their capacity as commissioned data processors, any data processing activities undertaken by such providers shall not require your consent.

The service providers we have commissioned to create and run the App:

- Service provider for hosting services
- Service provider for programming services
- Service provider for hotline services

We only transmit your data to other recipients where necessary to fulfil a contract with you, where we or the recipient has a legitimate interest in the disclosure of your data, or where you have given your consent to that transmission. These recipients include service providers and other companies within our corporate group. Furthermore, data may be transmitted to other recipients in the event that we are obliged to do so due to legal provisions or enforceable administrative or court orders.

Other recipients of your data are also other service providers whose offers and services (third-party services) can be used in connection with the App (see item 9).

6. Recording App usage

Data on App usage can be recorded by the App (see item 1.d. above). In this context, the Adobe Analytics service is used, which is offered by Adobe Systems Software Ireland Limited, 4-6 Riverwalk, Citywest Business Campus, Dublin 24, Republic of Ireland (hereinafter "Adobe").

If the "Enable usage-data tracking" function is activated, App usage data will be sent to and stored in an Adobe server in the UK. The App usage data enable you to analyse how you use the App (see item 1.d. above). IP anonymisation is activated for this App, which means that the IP address you use is truncated before being sent to the server. Adobe will use this information on behalf of Home Connect to evaluate how you use the App and to prepare reports on App activity for Home Connect. The IP address transmitted from your mobile device within the context of Adobe Analytics will not be merged with other data held by Adobe or Home Connect without your express consent.

You can control whether or not App usage data (incl. your IP address) is recorded and processed by Adobe by activating or deactivating the function "Enable usage-data tracking". Depending on the legal situation in your country, the "Enable usage-data tracking" function may be activated by default.

7. Error reports

We use HockeyApp (<http://www.hockeyapp.net>) to collect and send anonymous error reports if the App behaves in an unexpected way, especially if the App crashes. Our service providers and Home Connect shall receive error reports only with your explicit consent. We shall ask for your consent each time we wish to convey such information.

8. Data security

We deploy technical and organisational measures to protect your data, for example, from manipulation, loss and unauthorised third-party access. These measures include the use of encoding technologies, certificates, firewalls on the Home Connect server and password protection on the Home Connect App. The data security level of the Home Connect App has been tested and certified by TÜV Trust IT. We are constantly reviewing and improving our security measures in accordance with technological advancement.

9. Scope of application of the data protection information

This data protection information shall apply to the functions and services offered by Home Connect via the App, however it shall not apply to third-party services, even if Home Connect facilitates the use of such third-party services in the App (please also see the terms of use with regard to third-party services). The use of such third-party services is governed by the prevailing data protection provisions put in place by the third-party service provider and, if applicable, additional data protection information on our part which outline the distinctive features of these third-party services and shall only be relevant in this respect.

If you are referred to another service provider, Home Connect shall make reasonable and appropriate efforts to elucidate such referral (e.g. by embedding the service provider's content within the App using inline frames) if such referral is not clear. If you click on a link in the Home Connect App which calls up the app or website of another service provider, this is considered to be a clear referral.

If you, the user, are located within the area of application of the REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), please note that the use of third-party services may result in your personal data being processed in countries outside the area of application of the General Data Protection Regulation.

10. Changes to the data protection information

As the App continues to undergo development – among other things, through the implementation of new technologies or the introduction of new services – this data protection information may need to be adjusted accordingly. Home Connect shall reserve the right to amend or supplement this information as required. Home Connect will always update the data protection information in the App; you can therefore familiarise yourself with the latest version at any time.

11. Rights and contact information

If, despite our efforts to store data which is correct and up-to-date, your personal details are stored incorrectly, we shall correct such information upon your request. After giving us your consent for the collection, processing and use of your personal data, you may withdraw such consent at any time with effect for the future. Consent may generally be withdrawn using the respective App setting or otherwise through the contact information referred to in the App.

Your personal data will be deleted if you withdraw your consent to your data being stored, if your personal data is no longer needed to serve the purpose pursued by such storage or if such storage is inadmissible for other legal reasons. Please bear in mind that, for technical or organisational reasons, there may be an overlap between you withdrawing your consent and your data being used, e.g. in the case of a newsletter which has already been sent out. Data required for billing and accountancy purposes or which are subject to the legal duty to preserve records are not affected by this.

Should you have any questions on the topic of data protection or should you wish to exercise your rights to withdraw consent or to information, rectification, deletion or suspension, please contact us using the contact information provided in the App.

12. Additional information pursuant to the REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

a. Legal bases for intended data uses

We base the following data uses on

- the performance of a contract according article 6(1b) of Regulation (EU) 2016/679:
 - Provision of App features as well as the services offered via the App by processing the data categories listed in the items 1.a.-c.
 - Transfer of data categories listed in the items 1.a.-c. to service providers of third-party services which can be used in connection with the App (see item 9).
- legitimate interests according article 6(1f) of Regulation (EU) 2016/679:
 - Bug fixing by processing the data categories listed in the items 1.b. and c.
 - The Improvement of App's user friendliness by processing the data categories listed in the item 1.d.
 - The Improvement of our range of products and services, especially with regard to programs that are not used and/or that are frequently used, besides other App and household appliance features by processing the data categories listed in the items 1.c. and d.
- your consent according article 6(1a) of Regulation (EU) 2016/679:
 - Direct marketing purposes by processing the data categories listed in the items 1.a.-c.

b. Your rights

Your additional rights to item 11 are outlined below. To exercise your rights, please use the contact information provided at the end of this data protection information.

- **Your right to information about your data:** We will provide you with information about the data we hold about you on request.
- **Your right to correct and complete your data:** We will correct inaccurate information about you if you notify us accordingly. We will complete incomplete data if you notify us accordingly, provided this data is necessary for the intended purpose of processing your data.
- **Your right to delete your data:** We will delete the information we hold about you on request. However, some data will only be deleted subject to a defined period of retention, for example because we are required to retain the data by law in some cases, or because we require the data to fulfil our contractual obligations to you.

Please see also item 11.

- **Your right to have your data blocked:** In certain legally determined cases, we will block your data if you would like us to do so. Blocked data is only further processed to a very limited extent.
- **Your right to withdraw consent:** You can withdraw consent given for your data to be processed with effect for the future at any time. The legality of processing your data remains unaffected by this up to the point at which your consent is withdrawn.

Please see also item 11.

- **Your right to object to the processing of your data:** You can object to the processing of your data with effect for the future at any time, if we are processing your data on the basis of one of the legal justifications set out in article 6(1e or 1f) of Regulation (EU) 2016/679. In the event that you object we will cease processing your data, provided that there are no compelling and

legitimate grounds for further processing. The processing of your data for the purposes of direct marketing never constitutes compelling and legitimate grounds for us.

- **Your right to data portability:** At your request, we can make certain information available to you in a structured, commonly used and machine-readable format.
- **Your right to appeal to a regulatory authority:** You can lodge an appeal pertaining to data protection with a data protection authority. To do so, contact the data protection authority responsible for your place of residence or the data protection authority under whose jurisdiction we fall (named below).

Bavarian Data Protection Authority (BayLDA), <http://www.baylda.de>.

c. Transmission to recipients outside the EEA

If necessary, for the provision of App features as well as the services offered via the App, we also transmit personal data to recipients based outside of the EEA, in so-called third countries. In this case, we ensure – before any data is shared – that either an appropriate level of data protection is maintained by the recipient (e.g. on the basis of an adequacy decision made by the EU Commission for the respective country or the agreement of standard EU contractual clauses between the European Union and the recipient) or that you have given your consent to said sharing.

We are happy to provide you with an overview of the recipients in third countries and a copy of the specific provisions agreed to ensure an appropriate level of data protection. To request this, please use the contact information provided at the end of this data protection information.

Please see item 9 for transmission of personal data by usage of third-party services.

d. Contact details of the data protection officer

If you have any questions relating to data protection or exercising your rights, you can use the following contact information to get in touch with our data protection officer directly:

BSH Hausgeräte GmbH
Data Protection Officer
Carl-Wery-Str. 34
81739 Munich, Germany

Data-Protection-DE@bshg.com

Date of issue: March 2018