

Data Protection Notice for Online-Offers

(CD 2900 - 008) | Version – R0

1. Data Protection Notice

Robert Bosch Engineering and Business Solutions Private Limited (hereby referred as RBEI) welcomes you to our Phantom Energy Monitoring Cloud applications (also referred to as “Online service”). We thank you for your interest in our company and our products.

2. RBEI 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 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.

3. Controller

The customer of Phantom Energy Monitoring Solution is the controller of data and RBEI is the entity (processor) responsible for the processing of your data and; exceptions are outlined in this data protection notice.

Our contact details are as follows:

Phantom support team | Email ID: support.phantom@boschiot.zohodesk.com

Robert Bosch Engineering and Business Solutions Private Limited - (CIN: U72400KA1997PTC023164) | 123, Industrial Layout, Hosur Road, Koramangala | Bengaluru 560095 | INDIA | www.bosch-india-software.com

4. Collection, processing and usage of personal data

4.1. Processed categories of data (as approved in ISDS)

The following categories of data are processed:

- Communication data (e.g. Name, telephone/mobile number, e-mail)
- Miscellaneous: User's email id works as the User ID for Phantom Energy Monitoring Solution. When a User is deleted, all the personal data is removed except the Email ID that is used to depict the historical actions taken by that user in that account.

4.2. Principles

Personal data consists of all information related to an identified or identifiable natural person, this includes, e.g. names, phone numbers, email addresses, which is an expression of a person's identity.

We collect, process and use personal data 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.

4.3. Processing purposes and legal basis

We as well as the service providers commissioned by us; process your personal data for the following processing purposes:

4.3.1: Provision of Phantom Energy Monitoring Cloud application including alerts and reports to configured users and User authentication related services

(Legal basis: Legitimate interest on our part in order to provide our Phantom Energy Monitoring Cloud application comprehensively).

4.3.2: 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).

4.3.3: Safeguarding and defending our rights.

(Legal basis: Legitimate interest on our part for safeguarding and defending our rights).

5. 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 6 months 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).

In log files, the following information is saved:

- IP address (internet protocol address) of the terminal device 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; kind of data eg: request parameters
- Operating system and information on the internet browser used, including add-ons installed (e.g., Flash Player);
- Kind of resources
- http status code (e.g., "Request successful" or "File requested not found").

6. Service Provider (general)

We involve external service providers with tasks such as sales and marketing services, 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 with the statutory provisions. Service providers may also be other Bosch group companies.

7: Processing outside the EEA

We might process personal data outside the EEA in so-called third countries. In such cases, prior to the transfer we ensure that the data recipient provides an appropriate level of data protection.

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.

8: Duration of storage, retention periods

Principally, we store your data for as long as it is necessary to render our Online services and connected services. 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) or services to the customer/business.

9: Credit assessments

Credit assessments

We have a legitimate interest in performing the credit assessments set forth in this section for the purpose to protect ourselves from bad debts or investments. We might commission companies performing mathematical and statistical analysis to assess the risk of payment default and deliver, within the scope of what is allowed under law, information on the probability of payment defaults. For the assessment, address data may be used, but not exclusively.

In case the result of a credit assessment does not satisfy our requirements, we reserve the right to ask for an assured payment method (e.g. credit card) or to refuse to enter into a contract.

A credit assessment is based on automated decision-making. If you disagree with the result, you may submit your point of view in writing to be reviewed by a responsible person. In addition, you are entitled to find out about the essential reasons supporting the decision of the respective service provider.

We have commissioned the following service providers with credit assessments:

5.1: Unified Credit Solutions Pvt Ltd

Dharamdas Shastri Marg, Rajinder Nagar, New Delhi, Delhi 110060

5.2: Mira Inform Private Limited

605, Palmspring, Above Croma, Link Road, Malad (West), Mumbai – 400064. India

10: Cookies

Usage of Cookies

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

10.1:

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.

10.1.1:

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 session information for retaining the user session in web application.

Such cookies will be deleted when you leave the website.

10.2: **Cookie management**

Management of cookies

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.

10.2.1: **Deactivation of all cookies**

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.

11: 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.

12: 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 may request to receive data that you have provided to us in a structured, commonly used and machine-readable format.

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 "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.

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.

13: 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. The contact is as follows:

DPO.India@in.bosch.com

Data Protection Officer Bosch India
Post Box No 3000 Hosur Road, Aduodi,
Bengaluru, Karnataka – 560 030 - India

14: 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.

15: 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: [2021.02.24]