

# Data Protection Notice

## Data protection policy of KEENFINITY GmbH

KEENFINITY GmbH (hereinafter " KEENFINITY " or "We" or "Us") is delighted about your visit to our internet pages and mobile applications (together also referred to as "Online Offers") and about your interest in our company and our products.

### 1. KEENFINITY 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 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.

### 2. Controller

KEENFINITY is the controller responsible for the processing of your data; exceptions are outlined in this data protection notice.

Our contact details are as follows:

KEENFINITY GmbH  
Fritz-Schäffer-Straße 9  
81737 München  
GERMANY

Email: [Dataprotection.Keenfinity@de.bosch.com](mailto:Dataprotection.Keenfinity@de.bosch.com)

Phone: +49 89 6290-0

### 3. Collection, processing and usage of personal data

#### 3.1. Processed categories of data

The following categories of data are processed:

- Communication data (e.g. name, telephone, e-mail, address, IP address)
- Contractual master data (e.g. contractual relationships, contractual or product interest)
- Client history
- Contract accounting and payment data
- Geolocation

### 3.2. 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 you have given your consent to the processing or use of personal data concerning this matter, e.g. by means of registration.

### 3.3. Processing purposes and legal bases

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

- Provision of these Online Offers including contact form to contact us for the products and services offered by us for the purpose of the fulfillment of a contract.  
(Legal basis: Justified interest on our part in direct marketing as long as this occurs in accordance with data protection and competition law; as well as the fulfillment of contractual obligations).
- Provision of these Online Offers and fulfillment of contractual obligation's under our contractual terms including invoicing and prior credit assessment. Invoicing may include the sale of claims.  
(Legal bases: Fulfillment of contractual obligation respectively our justified interest in an efficient claims management and in avoiding claim defaults as regards the sale of claims and the credit assessment).
- Resolving service disruptions as well as for security reasons.  
(Legal bases: Fulfillment of our legal obligations within the scope of data security and justified interest in resolving disruptions/disturbances and in the security of our offers).
- Self-promotion and promotion by others, as well as market research and reach analysis within the scope statutorily permitted or based on consent.  
(Legal bases: Consent / justified interest on our part in direct marketing as long as this occurs in accordance with data protection and competition law).
- Sending an email or SMS/MMS newsletter with the recipient's consent.  
(Legal basis: Consent).
- Safeguarding and defending our rights.  
(Legal basis: Justified interest on our part for safeguarding and defending our rights).
- Geolocation: In this process, IP addresses are shortened to the last octet before being used in any analysis of user behavior. Your IP address is also only used in its shortened form when establishing an approximate geolocation. Here, the country of origin is determined and this data is then stored. (Provided legal basis: legitimate interests, as long as they are in accordance with the standards determined by data protection laws and competition regulations)

### 3.4. 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, email address, if applicable, details on the preferred payment method or on the account holder) as well as further data on voluntary basis, if applicable. Mandatory information is marked with an \*.

### 3.5. Log files

Each time you use the internet, your browser is transmitting certain information which we store in so-called log files.

We save log files for a short period of time to determine service disruptions and for security reasons (e.g., to investigate attack at-tempts) and delete them after-wards. 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). Also see module web analysis.

In log files, in particular the following information is saved:

- IP address (internet proto-col address) of the terminal device which is being 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 in-formation on the internet browser used, including add-ons installed (e.g., Flash Player);
- http status code (e.g., “Re-quest successful” or “File requested not found”).

### 3.6. Children

This Online Offer is not meant for children under 16 years of age.

### **3.7. Data transfer**

#### **3.7.1. 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 our-selves, or a third party, have a legitimate interest in the data transfer, or if you have given your consent. Particulars on the legal bases can be found in the Section - Purposes of Processing and Legal Bases. Third parties may also be other companies of the KEENFINITY 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.

#### **3.7.2. 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 KEENFINITY Group companies.

#### **3.7.3. Payment service providers**

We involve external payment service providers.

Depending on the type of payment method you choose during the ordering process, we transfer data used for the processing of payments (e.g., bank account or credit card data) to the financial institution charged with the payment or to payment service providers commissioned by us. Sometimes, payment service providers also collect and process such data as controllers. In this case (payment service providers are data controllers), the data protection notice or privacy policy of the respective payment service provider applies.

#### **3.7.4. Claims management**

We reserve the right to have claims collected by external service providers.

Additionally, we have a legitimate interest in selling claims to third parties and in transferring data necessary for the collection of the claim to the respective buyer of the claim. During claim collection, claim buyers act in their own names and are themselves responsible for processing the data. In this respect, the data protection notices of the respective claim buyer apply.

### **3.8. 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.

### **3.9. Duration of storage; retention periods**

Principally, we store your data for as long as it is necessary to render our Online Offers and the services connected to them, or for as long as we have a justified interest in storing the data (e.g., we might still have a justified interest in postal mail marketing upon fulfillment of a contract). In all other cases, we delete your personal data with the exception of data we must store to fulfill legal obligations (e.g., we are obliged due to retention periods under the tax and commercial codes to have documents such as contracts and invoices available for a certain period of time).

## **4. Credit assessments**

We have a justified 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 re-fuse 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 case handler. In addition, you are entitled to find out about the essential reasons supporting the decision of the respective service provider.

## 5. Reports made to credit agencies

We report due claims to credit agencies when, despite maturity, no payment has occurred, when the transfer is necessary to preserve our justified interests or justified interests of third parties and when the additional statutory requirements are present. These are

- the enforceability of the claim or the presence of an explicit promissory letter; or
- the issuance of at least two written overdue notices upon maturity of the claim, whereas the first overdue notice must have occurred at least four weeks prior and the debtor has been informed of the possibility of submitting the claim to a credit agency (in this first notice or at least before actual submittal to the credit agency) and the claim has not been disputed; or
- the possibility of the termination of the contractual relationship without previous notice due to arrears and the debtor has been informed about the possibility of submitting the claim to a credit agency.

In addition, we may report behavior contravening the contract (e.g., fraudulent behavior, misuse) to credit agencies as far as this is necessary to preserve our justified interests or the justified interests of third parties and there is no reason to assume that the affected person's interests worthy of protection outweigh or prevail over these justified interests.

## 6. 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.

### 6.1. 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.

#### *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. 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.

We distinguish between two sub-categories with regard to these cookies and tracking mechanisms:

- **Comfort cookies:** These cookies facilitate operation and thus allow you to browse our online service more comfortably; e.g. your language settings may be included in these cookies. Comfort cookies are currently not used.
- **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.

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.

## **6.2. Overview of the marketing tools and cookies we use**

You will find an overview of the marketing tools and cookies we use in this section.

- **Cookie name:** bosch-privacy-settings-v2  
**Storage period:** This cookie will be stored for a maximum of 12 months or until you revoke your consent to the use of cookies.  
**Function:** Remembers your consent to the use of cookies for this website.
- **Tool 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.
- **Tool name:** Google Optimize  
**Provider:** Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA  
**Function:** Cookie can analyze how users have behaved on a cross-site basis, UX testing.
- **Tool name:** Google Tag Manager  
**Provider:** Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

Function: Administration of website tags via a user interface, integration of program codes on our websites.

- Tool name: New Relic  
Provider: New Relic Inc. 111 SW 5th Ave 2700, Portland, OR 97204  
Function: Measurement of website availability and downtime

### **6.3. 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.

#### *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 technically not required 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.

## **7. Usage of our mobile applications**

In addition to our Online Offers, we offer mobile applications ("Apps"), which you can download to your mobile device. Beyond the data collected on websites, we collect additional personal data through our apps that specifically result from the usage of a mobile device. This occurs only when you expressly grant your consent.

### **7.1. Data processing by App Store operators**

No data collection by us or outside our responsibility includes the transfer of data such as username, email address and individual device identifier to an app store (e.g., Google Play by Google, App Store by Apple, Galaxy Apps Store by Samsung) when downloading the respective application. We are unable to influence this data collection and further processing by the App Store as controller.

## 8. 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.

## 9. Google Maps

Our Online Offers use the map service Google Maps via an API. The provider is Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. For the use of the functions of Google Maps it is necessary to store your IP address. This information is usually transmitted to a server of Google LLC in the USA and saved there. The provider of this page does not have any influence on this transmission of data.

The use of Google Maps is in the interest of an appealing presentation of our online offers and an easy retrievability of the places listed by us on the website. This represents a predominant legitimate interest on our part within the meaning of article 6 section 1 lit. f GDPR.

Please see the privacy policy of Google for more information on the handling of user data:

<https://www.google.de/intl/de/policies/privacy/>

## 10. Social Plugins

In our Online Offers we use so-called social plugins from various social networks. They are individually described in this section.

When using plugins, your internet browser creates a direct connection to the respective social networks' server. Hereby the respective provider receives the information that your internet browser accessed from the respective site of our Online Offers - even if you do not have a user account with this provider or are currently not logged into your account. Log files (including the

IP address) are, in this case, directly transmitted from your internet browser to a server of the respective provider and might be stored there. The provider or its server may be located outside the EU or the EEA (e.g. in the United States).

The plugins are standalone extensions by social network providers. For this reason, we are unable to influence the scope of data collected and stored by them.

Purpose and scope of the collection, the continued processing and usage of data by the social network as well as your respective rights and setting options to protect your privacy can be found by consulting the respective social network's data protection notices.

In case you do not wish social network providers to receive and, if applicable, store or use data, you should not use the respective plugins.

## Facebook plugins

Facebook is operated under [www.facebook.com](http://www.facebook.com) by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA, and under [www.facebook.de](http://www.facebook.de) by Facebook Ireland Limited, Hanover Reach, 5-7 Hanover Quay, Dublin 2, Ireland ("Facebook"). Find an overview over Facebook's plugins and their appearance here: <https://developers.facebook.com/docs/plugins>; find information on data protection at Facebook here: <http://www.facebook.com/policy.php>.

## Twitter plugins

Twitter is operated by Twitter Inc., 1355 Market St, Suite 900, San Francisco, CA 94103, USA ("Twitter"). Find an overview over Twitter's plugins and their appearance here: <https://developer.twitter.com/en/docs/twitter-for-websites/overview.html>; find information on data protection at Twitter here: <https://twitter.com/privacy>.

## Pinterest plugins

Pinterest is operated by Pinterest Inc., 808 Brennan St, San Francisco, CA 94103, USA ("Pinterest"). Find an overview over Pinterest's plugins and their appearance here: <https://developers.pinterest.com/tools/widget-builder/>; find information on data protection at Pinterest here: <https://about.pinterest.com/de/privacy-policy>.

## LinkedIn

LinkedIn is operated by LinkedIn Corporation: LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland.

## 11. Communication tools on social media platforms

We use on our social media platform (e.g. LinkedIn, Facebook) communication tools to process your messages sent via this social media platform and to offer you support.

When sending a message via our social media platform the message is processed to handle your query (and if necessary additional data, which we receive from the social media provider in connection with this message as your name or files).

In addition we can analyze these data in an aggregated and anonymized form in order to better understand how our social media platform is used.

We will forward the personal data you provide to the KEENFINITY legal entity responsible for the processing of your query (for example, in the event your query refers to a product that is distributed by another KEENFINITY legal entity). The legal basis for the processing of your data is our legitimate interest (Art. 6 para. 1 lit. f GDPR) or, if applicable, an existing contractual relationship (Art. 6 para. 1 lit. b GDPR). The processed personal data is deleted 180 days upon receipt of your message the latest.

## 12. 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. Alternatively, please contact us via the contact details provided in the Contact section.

## 13. External links

Our Online Offers may contain links to third party internet pages – by providers who are not related to us. Upon clicking the link, we have no influence on collecting, processing and using personal data possibly transmitted by clicking 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 behavior of third parties is naturally outside our supervision. We do not assume responsibility for the processing of such personal data by third parties.

## 14. 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 is 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.

## 15. 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 concerning yourself without undue delay from us. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

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:**

You have the right to object to data processing by us 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 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 any time, insofar as this is based on the legal basis of justified interest. We will then terminate the processing of your data, unless we demonstrate compelling legitimate grounds according to legal requirements for the processing, which override your rights.

### **Withdrawal of consent:**

In case you consented to the processing of your data, you have the right to object this consent with immediate effect. The legality of data processing prior to your revocation remains unchanged.

### **Data portability:**

You are entitled to receive data that you have provided 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.

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### **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 or to the supervisory authority responsible for us. This is:

State Commissioner for Data Protection and Freedom of Information

Address:

Königstrasse 10a  
70173 Stuttgart  
GERMANY

Postal address:

P.O. Box 10 29 32  
70025 Stuttgart  
GERMANY

Phone: +49 (0) 711/615541-0

Fax: +49 (0) 711/615541-15

Email: [poststelle@fdi.bwl.de](mailto:poststelle@fdi.bwl.de)

## **16. Changes to the Data Protection Notice**

We reserve the right to change our security and data protection measures if this is required due to technical development. In such cases, we will amend our data protection notice accordingly. Please therefore observe the current version of our data protection notice, as this is subject to change.

## 17. 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 the following link:

<https://www.bkms-system.net/bosch-datenschutz>

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)  
KEENFINITY GmbH  
Fritz-Schäffer-Straße 9  
81737 München  
GERMANY

or

mailto: [Dataprotection.Keenfinity@de.bosch.com](mailto:Dataprotection.Keenfinity@de.bosch.com)

## 18. Effective date: 24.07.2025