

## Privacy Policy

"Webasto BlueCool Connect App and Website"

As of 04/07/2024

The Webasto Group companies respect your privacy and take the protection of your personal data very seriously. We want you to know how and when we collect what data and how we use it. We have taken technical and organisational measures to ensure that the regulations on data protection are observed. Your personal data will be processed exclusively in accordance with the provisions of the EU General Data Protection Regulation (GDPR) and local data protection laws.

The Webasto branded mobile app "BlueCool Connect" ("**app**") is provided by Webasto Roof & Components SE, Kraillinger Str. 5, 82131 Stockdorf, Germany, Germany ("**Webasto**"). The app enables you, among other things, to control your air-conditioning units independent of the distance to your boat, and to monitor the temperature in the cabin. You can also access the same services via the [bluecool.webasto-connect.com](https://bluecool.webasto-connect.com) website. To do this you have to create an account. The BlueCool Connect control unit offers an off-line alternative via an embedded server, where you have the possibility to locally control your air-conditioning units without the need to create an account.

In order for you to use our services, certain personal data that you have made available to us have to be processed.

### Personal data

Personal data is information related to you as a person. This includes information such as your name or your telephone number. Webasto collects personal data from users of our apps. These personal data are limited to the types of information required to use the apps services. The personal data that may be requested from you are (if you have provided them to us):

- First and Last name (if provided when performing payment transactions or contacting Webasto)
- Payment details (like i.g. credit card number or PayPal account, only processed by payment partner)
- Phone Number (if provided when contacting Webasto)
- Email address (necessary to provide full range of services)

Availability of certain BlueCool Connect services, such as firmware updates of your air-conditioning units - if mobile network connectivity is provided via the BlueCool Connect unit - are limited by country. If a SIM card is installed in the BlueCool Connect device and it is connected to a mobile network, it can be used by Webasto to detect the current country where the device is located.

The processing of your personal data is necessary if you wish to use the app. Otherwise only limited or no functionalities can be offered. Webasto uses your personal

data to provide you with our app services. These services include saving your preferred settings and the BlueCool Connect running time.

In the following sections, you will learn the purpose for which Webasto passes on your personal data to third parties, which personal data is processed when you use the app, how we use your location data and how we provide customer service.

The processing of your personal data is based on your consent.

### **Purposes of the processing and legal bases**

#### **To fulfil contractual obligations (Article 6(1)(b) GDPR)**

The processing of your data is carried out on the basis of Article 6(1)(b) GDPR for the provision and implementation and fulfilment of our obligations arising from the contractual relationship with you, within the framework of the execution of our contracts with our customers and suppliers or for the implementation of pre-contractual measures which are carried out at your request. Furthermore, the legal basis is relevant for those processing operations which are necessary to enable us to provide you with our online offer. This also covers the transfer of data to our service providers.

#### **Within the scope balancing of interests (Article 6(1)(f) GDPR)**

Where necessary, we process your data beyond the actual fulfilment of the contract in order to protect our legitimate interests or those of third parties. Due to the large number of theoretically conceivable processing contexts, the following points should be understood to be merely an extract of the most practice-relevant situations. We can provide more detailed information within the scope of specific information claims. This includes in particular

- Assertion of legal claims and defence in legal disputes,
- Ensuring the IT security and IT operation of the company,
- Analysis of anonymous user data for the purpose of expanding and improving our website,
- Prevention and investigation of criminal offenses,
- Measures for business management and further development of services and products,
- Risk management in the Webasto Group.

#### **On the basis of your consent (Article 6(1)(a) GDPR)**

If you have given us permission to process personal data for certain purposes (e.g. advertising measures for non-customers), the legality of this processing is based on this permission.

A granted consent can be revoked at any time. This also applies to the revocation of declarations of consent provided to us prior to the validity of the GDPR, i.e. before May 25, 2018. The revocation of a consent is only effective for the future and does not affect the lawfulness of the data processed up to the revocation.

#### **Transfer of personal data to third parties**

Webasto uses external service providers to provide the services and functions of the Apps ("**Service Provider**"). All Service Providers used by Webasto have been commissioned, carefully checked and selected in accordance with data protection requirements. A transfer of data to other third parties is excluded, unless you have expressly consented to this.

Information for controlling your Webasto device (e.g. BlueCool unit) is stored in the app. The personal data is stored in one or more databases hosted by service providers. The service providers do not use or process your personal data for any purpose other than to provide the services related to the services of the BlueCool Connect app.

### **Webasto BlueCool Connect; Provision of the App**

For the provision of services within the scope of BlueCool Connect and the provision of the app, Webasto cooperates with the external service provider Embelin Oy, Yrttipellontie 10, 90230 Oulu, Finland ("**Embelin**"). Webasto has concluded a corresponding service contract with the service provider for this purpose, including an agreement on contract data processing as per Article 28 GDPR.

In compliance with the provisions of data protection law, Embelin collects and processes your personal data which is necessary for the use of BlueCool Connect on behalf of Webasto. The data is administered by Embelin in the Google North Europe Cloud. The BlueCool Connect functions are based on the transfer of data from the Webasto device (e.g. the BlueCool Connect Unit) to the Embelin back-end. The BlueCool Connect functions allow you to view information about the started and finished processes that have been performed based on the nature of your installed control Unit, as well as enable country specific functionalities.

Embelin, for its part, uses its own service providers (e.g. Paypal, Stripe and Google) to provide the services for Webasto. Embelin uses Paypal and Stripe in particular for billing when the user renews the services. In this case too, it is ensured that your personal data are sufficiently protected. Embelin has equally committed these service providers to comply with all data protection regulations and the agreements with Webasto.

Embelin provides the following services to Webasto:

- Provision of the app as well as the website and connectivity;
- Hardware specific data preparation and analysis (e.g. Embelin generates anonymous reports on how many devices are installed, to which mobile networks they are connected, how much heating events happen etc. No personal data is tied to such reports);
- Provision of the IT infrastructure required to operate the app;
- Back-end management;
- Billing;
- Account management.

In addition, Embelin uses the data to develop or improve the services in the context of providing the Webasto Connect services. For development purposes, Embelin might observe device connectivity, BlueCool unit functionality, WBUS communication, etc. This information is used to pinpoint possible issues, improve device software and functionality. Embelin doesn't match the data with your email.

In the context of a justified request for information or data deletion, Webasto will arrange for this to be done accordingly.

## **Your personal data are collected in the following cases:**

### **When using the Apps or linking to the website**

You can operate and control your BlueCool unit devices via the app. There is also the possibility to control the units via the website. To do this you can be asked to directly create an account.

### **When using the payment options to extend the use of Bluecool Connect**

Webasto offers the following functions:

In order to pay in advance for the renewal of your use of the Webasto Connect services, you will be transferred from our website to a payment service provider (Stripe or PayPal), which will process your payment data in accordance with its privacy policy or general terms and conditions of business. The processing of these personal data is necessary so that the services of Webasto Connect can be activated. No payment data is stored by Webasto.

### **When you contact Webasto**

You can reach us by e-mail, telephone or mail; the link to our customer centre can be found at [www.webasto-comfort.com](http://www.webasto-comfort.com). We retain this correspondence and the information it contains and use it to respond to your inquiry, or to record your complaint, request or similar.

### **Transmission of personal data within the European Economic Area**

Webasto is headquartered in Germany and is subject to the EU General Data Protection Regulation. Information that we or our direct contractual partners collect from you is processed by Webasto and our contractual partners exclusively within the European Union.

### **Duration of storage**

We and the service providers engaged by us process and store your personal data for as long as is necessary to fulfil contractual and legal obligations.

If the data are no longer necessary for the fulfilment of contractual or legal obligations, they are regularly deleted, unless the - temporary - further processing of this is, insofar as the storage is subject to local laws, necessary for the following purposes:

- Fulfilment of storage obligations under commercial and tax law. The periods for storage or documentation specified there are usually two to ten years.
- Preservation of evidence within the framework of the legal statute of limitations. These limitation periods can be up to 30 years, with the regular limitation period being three years.

### **Your rights**

Your legal rights with respect to the processing of your personal data are as follows:

- Right of access to your stored data;
- Right of rectification;
- Right of deletion;
- Right to object;
- Right to restrict processing;
- Right to data portability.

To assert your rights, please use the contact information provided below. You can revoke your consent to the processing of your personal data at any time.

In addition, there is a right of appeal to a competent local data protection supervisory authority.

If you no longer agree to the storage of your personal data or if these data have become inaccurate, upon receipt of a corresponding instruction, we will have your data deleted, corrected or blocked according to the statutory provisions. Upon request, you will receive information, at no charge, concerning all your personal data that we have stored. If you have any questions regarding the collection, processing or use of your personal data, for information, correction, blocking or deletion of data or for the use of other rights, please contact our Group Privacy Officer at [dataprotection@webasto.com](mailto:dataprotection@webasto.com).

### **Security of your personal data**

Physical, technical, and administrative security measures are in place to protect the personal data you provide while using the Apps. We continually update and test our security technology. We restrict access to your personal information to those employees who need to know that information in order to provide benefits or services to you. In addition, we train our employees in the importance of confidentiality and maintaining the privacy and security of your information. We are committed to taking appropriate disciplinary action to enforce the data privacy responsibilities of our employees.

### **Questions and comments**

For questions, suggestions or comments regarding data privacy, please contact our Group Privacy Officer by email ([dataprotection@webasto.com](mailto:dataprotection@webasto.com)).

The rapid development of new Internet technologies makes it necessary to adapt our data privacy statement / Privacy Policy from time to time. You will be informed about new developments here.

### **Controller within the meaning of data protection law**

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