

Privacy Policy

"Webasto ThermoConnect App"

Version April 2022

Change history of the Privacy Policy of the Webasto Thermo Connect App

Date	Version new	Scope / extent of (main) changes
November 2019	1.0	Privacy Policy "Webasto ThermoConnect App"
July 2022	2.0	<ul style="list-style-type: none">• Modification of the regulations, where necessary, to integrate the new control unit Cronus Smart, which offers the possibility to control heating devices over Bluetooth.• New Data Protection Officer included.

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 the Federal Data Protection Act (BDSG).

The Webasto branded mobile app "ThermoConnect" ("**App**"), is an app provided by Webasto Thermo & Comfort SE, Friedrichshafener Str. 9, 82205 Gilching, Germany ("**Webasto**"). The use of the App requires either a ThermoConnect control unit, which connects via mobile network with the related Webasto product (e.g. the heater), independent of the distance from the product, or a Cronus Smart control unit, which connects via Bluetooth (depending on the distance from the product). Subject to the control unit used, the App enables you, among other things, to control your parking heater independent of or depending on the distance to the vehicle and to monitor the temperature in the car as well as to use, in individual cases, a location service with integrated GPS functionality. You can also access the same services via the my.webasto-connect.com website provided you have installed a ThermoConnect control unit (when using a Cronus Smart control unit; only subscription handling can be done via the website). To do this you can create a code (temporary ID number) for the one-time access to the website via the App. After entering the code on the website you have the option 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 App. These personal data are limited to the types of information required to use the App services. These personal data are (if you have provided them to us):

- Name,
- Phone number,
- Email address.

In addition, in connection with the use of the ThermoConnect control unit, for certain services such as geofencing, position-related events and - if offered in the respective country - the driver's logbook, we process the position data of your ThermoConnect control unit. If you do not consent to the transmission and processing of the position data, you can deactivate this in your individual settings via the my.webasto-connect.com website. Please note that it will only be possible to use these services again when this function is reactivated.

The processing of this personal data is necessary if you wish to use the App. Webasto uses this personal data to provide you with our App services. These services include saving your preferred settings, the Webasto Connect running time, and, in case of using the ThermoConnect control unit, tracking services such as finding your vehicle. 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 App ("**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. the parking heater) 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 App.

Webasto Connect; Provision of the App ThermoConnect

For the provision of services within the scope of WebastoConnect and the provision of the related App ThermoConnect, Webasto cooperates with the external service provider Embelin Oy, Yrttpellontie 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 on behalf of Webasto your personal data which is necessary for the use of WebastoConnect. The data are administered by Embelin in the Google West Europe Cloud. The WebastoConnect functions are based on the transfer of data from the Webasto device (e.g. the parking heater) to the Embelin back-end. The WebastoConnect functions allow you to view information about the started and finished heating processes that have been performed (when using a Cronus Smart control unit; only subscription handling is done over the backend).

Embelin, for its part, uses its own service providers (e.g. Paypal or Stripe) to provide the services for Webasto, in particular for billing when the services are renewed by the user. 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;
- Data preparation and analysis;
- 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.

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 App or linking to the website

You can operate and control your Webasto parking heater via the App. There is also the possibility to control the parking heater via the website (when using a Cronus Smart control unit; only subscription handling can be done via the website). To do this you can create a code (temporary ID number) for the one-time access to the website via the App. After entering the code on the website you have the option to create an account. Only in case of using a ThermoConnect control unit can the App be used via the standard map application stored in the mobile phone to display the location of the vehicle in which the Webasto product and ThermoConnect control unit are installed. The map provider "openstreetmap" is used on the website. - Further information on the processing and protection of your data can be found below in this Privacy Policy and in the privacy statements of the map providers. Unlike the location data of the control unit, Webasto does not receive or use this location data of the mobile phone or terminal device.

Alexa skill

Only in case of a use of the ThermoConnect control unit, the following applies:

You also have the option of operating the parking heater via the Alexa voice control (Amazon Echo); for this purpose, it is mandatory to create an account on the website (my.webasto-connect.com). For use of this, you must download the Alexa skill "Webasto" and link this to the account created on the website.

The legal basis for processing your personal data in this context is Article 6(1)(b) GDPR. More information about our Alexa skill "Webasto" is also available on our website.

Please note:

By using the Alexa skills for your Webasto product Amazon¹ may gain access to your personal data. We have no influence on the processing of your personal data by Amazon. Information on the handling of personal data by Amazon can be found in Amazon's privacy policy:

<https://www.amazon.de/gp/help/customer/display.html?nodeId=3312401>

When using your location data (only when using a ThermoConnect control unit)

With the App you can access the location of your vehicle in which the Webasto product and the ThermoConnect control unit are installed. For this purpose, you can transfer the GPS data of the vehicle location as the target value into your standard map application of your mobile phone or end device.

This function is subject to the general terms and conditions of business and privacy policy of the respective standard map application and the privacy settings of your device.

Standard map application (only when using a ThermoConnect control unit)

¹ The responsible Amazon companies can be found in the above mentioned link to the Amazon privacy policy.

The App uses the respective standard map application of your mobile phone or device to display interactive maps and to create driving directions. The standard map applications are map services of the respective providers, such as Google Inc, 1600 Amphitheatre Parkway, Mountain View, California 94043, USA for the map service Google Maps. By using the map services, information on the use of this App, including your IP address and the (starting) address entered in the route planner function, can be transmitted to these respective providers, possibly also outside the EU, e.g. to the USA. When you launch the App that contains the map service, a direct connection to the provider's servers is established. We have no influence on the scope of the data collected in this way by the respective provider, nor on the further processing and use of the data by this provider, and can therefore accept no responsibility for this.

For the purpose and scope of the data collection and the further processing and use of the data by the respective provider, as well as your rights and settings options for protecting your privacy in this regard, please refer to the data protection information of the respective provider.

When using the payment options to extend the use of WebastoConnect

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 of your choice, 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 post; the link to our customer centre can be found at 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.

Improving our services

We use data on all heating operations for internal purposes (e.g. time, duration, location of the charging session) to improve quality.

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 German law, necessary for the following purposes:

- Fulfilment of storage obligations under commercial and tax law, e.g. in accordance with the German Commercial Code (HGB), German Tax Code (AO), Money Laundering Act (GwG). 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. According to §§ 195 et seqq. of the German Civil Code (BGB), 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 data protection supervisory authority in Bavaria (Article 77 GDPR in conjunction with § 19 BDSG).

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. The right to information and the right to deletion are subject to the restrictions set out in §§ 34 and 35 BDSG. 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.

Security of your personal data

Physical, technical, and administrative security measures are in place to protect the personal data you provide while using the App. 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).

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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