

# DATA PROTECTION NOTICE

www.boschrexroth.com.tr

### **Data Protection Notice**

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# **DATA PROTECTION NOTICE**

Bosch Rexroth Otomasyon Sanayi ve Ticaret A.Ş.

Bosch Group (hereinafter "Bosch", "We" or "Us") welcomes you to our internet pages and mobile applications (together also referred to as "online offers"). We thank you for your interest in our company and our products.

# 1. Bosch 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 to our websites confidentially and only in accordance with statutory regulations.

Data protection and information security are included in our corporate policy.

# 2. Controller

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

Our contact details are as follows: Bosch Rexroth Otomasyon Sanayi ve Ticaret A.Ş. Organize Sanayi Bölgesi, Kırmızı Cadde, 3. Sokak No.1 16140 Nilüfer – Bursa / Türkiye Phone: 0 224 275 00 00

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

#### 3.1 - Processed data categories

Communication data (e.g. name, telephone number, e-mail address, address, IP address) are processed. Information Security Data (Such as IP address information, website visitor information, password information) Cookie data

# 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 if 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 basis

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

#### 3.3.1 - Provision of these online offers

**Legal basis:** Predominantly, legitimate interest on our part in direct marketing as long as this occurs in accordance with data protection and competition law.

#### 3.3.2 - In reply to user inquiries in the framework of a contact form

**Legal basis:** Predominantly, legitimate interest in direct marketing on our part and in the enhancement of our products and services, as long as this is carried out in compliance with data protection regulations and competition law regulations resp. contractual performance resp. consent.

#### 3.3.3 - Resolving service disruptions as well as for security reasons

**Legal basis:** Fulfillment of our legal obligations within the scope of data security and predominantly, legitimate interest in resolving service disruptions as well as in the protection of our offers.

# 3.3.4 - Self-promotion and promotion by others as well as market research and reach analysis done within the scope statutorily permitted or based on consent

**Legal basis:** Consent or predominantly, legitimate interest on our part in direct marketing if in accordance with data protection and competition law.

#### 3.3.5 - Safeguarding and defending our rights

Legal basis: Legitimate interest on our part in the assertion and defense of our rights.

#### 3.4 - Log files

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

We store log files to determine service disruptions and for security reasons (e.g., to investigate attack attempts) for a period of 7 days 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) see module 3.3.4 "Self-promotion and promotion by others as well as market research and reach analysis done within the scope statutorily permitted or based on consent"

In log files, the following information is saved:

IP address (internet protocol address) of the terminal device 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 information on the internet browser used, including add-ons installed (e.g., Flash Player);

http status code (e.g., "Request successful" or "File requested not found").

# 3.5 - Children

This online offer is not meant for children under 16 years of age.

#### 3.6 - Data transfer

#### 3.6.1 - 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 ourselves, or a third party, have a legitimate interest in the data transfer, or if you have given your consent. Particulars on the legal basis and the recipients or categories of recipients can be found in the section "Processing purposes and legal basis" (see no. 3.3).

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.

#### 3.6.2 - 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 with the statutory provisions. Service providers may also be other Bosch Group companies.

#### 3.6.3 - Transfer to recipients outside Türkiye

We might transfer personal data to recipients located outside Türkiye. In such cases, we ensure that data transfer is conducted in accordance with Turkish Personal Data Protection Law no. 6698 ("PDPL") and by taking all necessary technical and administrative measures to ensure the security of the transferred personal data.

#### 3.7 - Duration of storage, retention periods

Principally, we store your data for as long as it is necessary to render our online offers and connected services or for as long as we have a legitimate interest in storing the data (e.g. we might still have a legitimate interest in postal mail marketing after fulfillment of our contractual obligations). 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).

#### 4. 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.

#### 4.1 - 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.

#### 4.1.1 - 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 data to ensure smooth reproduction of video or audio footage.

Such cookies will be deleted when you leave the website.

The legal ground for usage of technically required cookies is that the processing of personal data is necessary for our legitimate interests in providing Bosch's website for your usage, provided that your fundamental rights and freedoms are not harmed.

#### 4.1.2 - Cookies and tracking mechanisms that are technically not required

We use marketing cookies and tracking mechanisms. We only use such cookies and tracking mechanisms if you have given us your prior explicit 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 in providing Bosch's website for your usage. You may always withdraw your explicit consent from "Privacy Settings" section on the website. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

#### General:

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.

#### **Conversion tracking:**

Our conversion tracking partners place a cookie on your computer ("conversion cookie") if you accessed our website via an advertisement of the respective partner. Normally these cookies are no longer valid after 30 days. If you visit certain pages of our website and the cookie has not yet expired, we and the relevant conversion partner can recognize that a certain user clicked on the advertisement and thereby was redirected to our website. This can also be done across multiple devices. The information obtained by means of the conversion cookie serves the purpose of compiling conversion statistics and recording the total number of users who clicked on the respective advertisement and were redirected to a website with a conversion tracking tag.

#### **Social plugins:**

Some of the pages of our online service involve content and services of other providers (e.g. Facebook, Twitter) which also may use cookies and active modules. For more details regarding social plugins please refer to the section on "social plugins" (see no. 7).

Please note that using the tools might include transfer of your data to recipients outside of Türkiye where there is no adequate level of data protection pursuant to PDPL (e.g. the USA). For more details in this respect please refer to the following description of the individual marketing tools:

#### 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.

#### 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

#### Name: Google Ads

**Provider:** Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA **Function:** Placement of advertisements, remarketing, conversion tracking. Further information is available at: <u>https://adssettings.google.com/authenticated</u>

#### Tealium

9605 Scranton Rd. Ste. 600

San Diego, CA 92121

+1 (858) 779-1344

# 4.2 - 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.

#### 4.2.1 - 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.

# 4.2.2 - 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 marketing 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.

# 5. Google

### 5.1 - Google Maps

This page uses 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 5/2 (f) of PDPL.

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

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

#### 5.2 - Google web fonts

This site uses so-called web fonts of the provider Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA for the uniform display of fonts. When you access a page, your browser loads the required web fonts into your browser cache to display texts and fonts correctly.

For this purpose, the browser you are using has to connect to the servers of Google. This informs Google that our website was accessed via your IP address. The use of Google web fonts is in the interest of a uniform and appealing presentation of our online offers. This represents a predominant legitimate interest on our part within the meaning of article 5/2 (f) of PDPL.

Your computer will use a standard font if your browser does not support web fonts.

For more information about Google web fonts please see <u>https://developers.google.com/fonts/faq</u> and the privacy policy of Google: <u>https://www.google.de/intl/de/policies/privacy/</u>

# 6. Content Delivery Network of Microsoft Azure

In order to optimize the loading times of this website, we use a so-called "Content Delivery Network" (CDN) Services, offered by public cloud from Microsoft, Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA.

The use of the CDN Services represents a predominant legitimate interest within the meaning of article 6 section 1 lit. f GDPR.

In context of this processing, personal data is transmitted to the USA. The Transmission is based on European Standard Contractual Clauses in which Microsoft guarantees to comply with the European data protection law for its provided services.

Further information about the privacy policy of Microsoft is available here: <a href="https://privacy.microsoft.com/en-us/privacystatement">https://privacy.microsoft.com/en-us/privacystatement</a>

# 7. Social plugins

In our online offer, we use so-called social plugins of different social networks; these will be described individually in this section.

On application of the plugins, your Internet browser will establish a direct connection to the servers of the respective social network. Hereby the relevant provider obtains the information that your Internet browser has called up the corresponding page of our online offer, even if you do not possess a user account with the provider or are not currently logged in with the provider. Log files (including the IP address) are directly transmitted from your Internet browser to a server of the relevant provider where they are stored if necessary. The headquarters of the provider or his/her server could be located outside Türkiye (e.g. in the USA).

The plugins are independent extensions of the providers of social networks. Therefore, we have no influence on the extent of the data collected and stored by the social network providers via the plugins.

The purpose and extent of the collection, the further processing of the data by the social network as well as your associated rights and setting options for the protection of your private sphere can be taken from the data protection notice of the respective social network.

You should not use the respective plugins if you do not want social network providers to obtain data concerning this online offer or to continue to use this data.

# 7.1 - Social plugins with 2-click solution

With a so-called 2-click solution, we protect you from having your visits to our websites recorded and evaluated by social network providers as standard. When you access a page of our internet offer, which contains such plugins, these are initially deactivated. The plugins are not activated until you click the provided button.

### 7.2 - Facebook plugins

Facebook is provided under www.facebook.com by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA, and under www.facebook.de by Facebook Ireland Limited, Hanover Reach, 5–7 Hanover Quay, Dublin 2, Ireland ("Facebook"). You will find an overview of the plugins from Facebook and their appearance here:

<u>https://developers.facebook.com/docs/plugins/?locale=en\_EN;</u> you will find information on data protection at Facebook here: <u>www.facebook.com/policy.</u>

#### 7.3 - Twitter plugins

Twitter is provided by Twitter Inc., 1355 Market St, Suite 900, San Francisco, CA 94103, USA ("Twitter"). You will find an overview of the plugins from Twitter and their appearance here: <a href="https://developer.twitter.com/">https://developer.twitter.com/</a>; you will find information on data protection at Twitter here: <a href="https://twitter.com/de/privacy">https://twitter.com/</a>; you will find information on data protection at Twitter here:

#### 7.4 - LinkedIn plugins

LinkedIn is provided by LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA ("LinkedIn"). You will find an overview of the plugins from LinkedIn and their appearance here: <u>https://developer.linkedin.com/plugins</u>; you will find information on data protection at LinkedIn here: <u>https://www.linkedin.com/legal/privacy-policy</u>.

#### 7.5 - Instagram eklentileri

Instagram is operated by Instagram LLC., 1601 Willow Road, Menlo Park, CA 94025, USA ("Instagram"). Find an overview over Instagram's plugins and their appearance here: <u>blog.instagram.com/post/36222022872/introducing-instagram-badges;</u> find information on data protection at Instagram here: <u>https://help.instagram.com/155833707900388/</u>

# 8. YouTube

This online offer uses the video platform YouTube, which is provided 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.

If you access a corresponding page of our offer, the embedded YouTube player will establish a connection to YouTube so that the video or audio file can be transmitted and played. In the process, data are also transmitted to YouTube as the responsible body. We are not responsible for the processing of this data by YouTube.

Further information concerning the extent and purpose of the collected data, on the further processing and utilization of your data by YouTube, on your rights and on your selectable data protection options can be found in the privacy policy of YouTube.

# 9. External links

Our online offers may contain links to internet pages of third parties, in particular providers who are not related to us. Upon clicking on the link, we have no influence on the collecting, processing, and use of personal data possibly transmitted by clicking on 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 conduct of third parties is naturally beyond our control. We do not assume responsibility for the processing of personal data by third parties.

# **10. 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.

# **11. User rights**

To enforce your rights, please use the details provided in the "Contact" section (see no. 13). In doing so, please ensure that an unambiguous identification of your person is possible.

In accordance with PDPL Article 11, by applying to Bosch you may exercise your data subject rights.

- a) Learn whether or not your personal data have been processed,
- b) İşlenmişse Request information as to processing if your data have been processed,
- c) Learn the purpose of processing of the personal data and whether data are used in accordance with their purpose,
- d) Know the third parties in the country or abroad to whom personal data have been transferred
- e) Request rectification in case personal data are processed incompletely or inaccurately,
- **f)** Request deletion or destruction of personal data within the framework of the conditions set forth under PDPL Article 7,
- **g)** Request notification of the operations made as per indents (e) and (f) to third parties to whom personal data have been transferred;
- **h)** Object to occurrence of any result that is to your detriment by means of analysis of personal data exclusively through automated systems,

i) Request compensation for the damages in case you incur damages due to unlawful processing of personal data

# 11.1 - 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.

# 12. Change of 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.

# 13. Contact

To assert your rights and to notify data protection incidents please use the following link:

#### https://www.boschrexroth.com/tr/tr/home\_18/kisisel\_bilgilerin\_korunmasi

For suggestions and complaints regarding the processing of your personal data we recommend that you contact our data protection officer:

Data Protection and Information Security Department Bosch San. ve Tic. A.Ş. Aydınevler Mah. İnönü Cad. No:20 Küçükyalı Ofispark A Blok 34854 Maltepe - İstanbul Türkiye

# Or

Mail to: rbtr.dso@tr.bosch.com

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