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## **1. Bosch respects your privacy**

The Robert Bosch Smart Home GmbH (hereinafter "Robert Bosch Smart Home GmbH" or "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.

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**

The Robert Bosch Smart Home GmbH is the controller responsible for the processing of your data; exceptions are outlined in this data protection notice.

Our contact details are as follows:

Robert Bosch Smart Home GmbH  
Schockenriedstr. 17  
70565 Stuttgart-Vaihingen  
GERMANY  
[service@bosch-smarthome.com](mailto:service@bosch-smarthome.com)

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

#### **3.1 Principles**

The Bosch Smart Home App and connected devices (e.g. Smart Home Controller) with their functionalities serve to offer you more comfort in your home. For the execution of the contract, i.e. for the provision of related services (e.g. app functionalities, control of the Smart Home Controller), it is unavoidable that we collect data that can be related to you or another natural person.

Personal data is all information that refers to an identified or identifiable natural person, such as names, addresses, telephone numbers, e-mail addresses, contract, booking and billing data that are an expression of a person's identity. Some of the data we process is not personal data. With regard to this information, we have neither an interest in identifying a natural person, nor do we have the necessary knowledge or the legally permissible means to establish a personal reference. We may use such non-personal data to improve our products, for example.

We only collect, process and use personal data if we have a legal basis for this or if you have given us your consent in this regard, e.g. as part of a registration. Several legal bases can coexist and allow the processing of personal data.

Processed data includes:

#### **Contract information (e.g. when purchasing from the online shop)**

This personal data that is necessary to establish, execute and terminate the contractual relationship with you. This includes in particular name and registration information.

#### **Usage-related and technical information**

This is information that is not personal or for which we are unable to establish any personal reference. These are required to enable the operation and use of the Bosch Smart Home System (in particular Smart Home Controller and Smart Home App). In concrete terms, these are:

- Characteristics for identification as user (SHC identification, IP address)
- Information on the beginning, end and scope of use of the Smart Home System
- Device IDs
- Device ID for event notification

- Settings of the app regarding the use of offered services
- Technical information to synchronize and provide current time and updates of your system via our servers
- System data e.g. connected devices and accessories, serial numbers, Smart Home Controller specifications, software versions of the individual components
- System status data, e.g. sensor readings, system time, timer program points, error messages
- History data of the Smart Home System
- Type of terminal used, e.g. smartphone or tablet PC, manufacturer, OS version of the terminal, device ID
- Application usage data e.g. frequency of use, registered crashes, application errors
- Smart Home system data.

### Registration via the central Bosch-ID

You may register for our online offers exclusively using the central Bosch-ID. The centralised Bosch-ID was devised by Bosch.IO GmbH for the Bosch Group in order to allow for the joint users to benefit from offers of different group companies using centralised application data and increase data safety. Bosch.IO GmbH, Ullsteinstraße 128, 12109 Berlin, Germany is responsible for the provision of this single sign-on service.

If you want to apply for a centralised Bosch-ID, the General Terms of Use for the Registration and Use of a centralised Bosch-ID and the Data Protection Notice of the Bosch.IO GmbH shall apply. After successful registration you may utilise the registration data used for the centralised Bosch ID also for registering for this online offer. To this end, we shall provide an Robert Bosch GmbH registration template for the centralised Bosch-ID. The Bosch.IO GmbH then shall confirm your authorisation and provide us with the master data required for using our offers (e.g. surname, first name, date of birth, company name, email address, telephone numbers, mail address). Your password shall not be communicated to us. Concerning further data transfers within the Bosch Group associated with the centralised Bosch-ID, please refer to the Data Protection Notice of the Bosch.IO GmbH.

### Notifications on your smartphone (push notifications)

Android user:

We use the Google Firebase Cloud Messaging service, which is operated by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, in order to send you notifications from your Smart Home system to your mobile end device (push notifications). To this end, a "Google Firebase Cloud Messaging registration token" is generated during installation and configuration of our app which clearly identifies app installation on your device. The use of Google Firebase Cloud Messaging requires the forwarding of your personal data, where applicable, to states (e.g. USA) in which there may be a lower level of data protection than in the EU.

You can find more information about Google Firebase Cloud Messaging at

<https://firebase.google.com/products/cloud-messaging/>

and in the Google privacy statement at

<https://policies.google.com/privacy?hl=en>.

iOS users:

We use the Apple Push Notification service, which is operated by Apple Inc. One Apple Park Way, Cupertino, California, USA, 95014, to send you notifications from your Smart Home system (push notification). If you use our app via a mobile end device which can receive push notifications, you can configure the receipt of "push notifications". Here, a pseudonymised device token ID, a unique connection number generated from the device ID, is allocated to your mobile end device. This allows us to address push notifications to you. You can edit notification through push notifications at any time in the app settings under "Settings" > "Push notifications". The use of Apple Push Notification requires the forwarding of your personal data, where applicable, to states (e.g. USA) in which there may be a lower level of data protection than in the EU.

Please see the Apple Inc. data protection conditions <https://www.apple.com/legal/privacy/en-ww/> for more information regarding data protection.

You can find more information about the terms of use for the Apple Push Notification service on the Apple Inc. website: <https://www.apple.com/legal/internet-services/terms/site.html>

### Use of analysis tools

We use Google Analytics Firebase (hereinafter referred to as Google Firebase) for analyses. The provider of Google Analytics Firebase is Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. The use of Google Firebase requires the forwarding of your personal data, where applicable, to states (e.g. USA) in which there may be a lower level of data protection than in the EU. Google automatically deletes the data which is communicated to Google Firebase and linked with your user ID after 14 months.

On the one hand, Google Firebase is used for statistics purposes, i.e. without inference of your personal data, in order to keep our service promises and in particular to ensure the best possible availability of services. Furthermore, we use the Google Firebase services in order to send you messages (push notifications) from your Smart Home system.

If you consent to it, we also use Google Firebase to analyse your usage behaviour. To this end, Google Firebase stores some information regarding use processes, operating system, device model or region. You can find a detailed overview of the data collected by Google Firebase and more information about Google Firebase at:

<https://support.google.com/firebase/answer/6318039?hl=en>. You can change your consent through the settings in the app at any time.

We learn how, when or in what manner you use the app and your Smart Home system, for example, through analysis of the information. We thus gain valuable insights for improving our products and services. Based on your usage behaviour, you can receive smart tips or recommendations (in-app messaging) for products, for example, in order to be able to make even better use of your Smart Home system as a result.

You can find more information about Google Firebase at:

<https://firebase.google.com/>

<https://www.firebase.com/terms/privacy-policy.html>

### *Integration of additional Smart Home products into your Bosch Smart Home System*

If you integrate additional Bosch Smart Home products (e.g.'360° Indoor Camera','Eyes Outdoor Camera','Home Connect') into your Bosch Smart Home System, it is usually necessary that you register with the product and/or service provider and accept the additional terms and conditions. It may also be necessary to allow connection to the Bosch Smart Home System in the additional product so that data can be exchanged. Please note that the data exchanged may be personal information.

### 3.2 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 service (app and online storage)*

(Legal basis: Fulfillment of contractual obligations).

#### *Customer administration*

(Legal basis: Fulfillment of a contractual obligations).

#### *Resolving service disruptions as well as for security reasons*

(Legal bases: Fulfillment of contractual obligations or fulfillment of our legal obligations within the scope of data security, and justified interest in resolving service disruptions as well as in ensuring the protection of our offers).

#### *Customer surveys*

Product or customer surveys performed via email and/or phone in case you have expressly consented to this

(Legal basis: Consent).

### Safeguarding and defending our rights

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

### Your request to the Robert Bosch Smart Home GmbH

(Legal basis: Fulfillment of contractual obligations or implementation of pre-contractual measures; justified interest on our part on the consideration and clarification of request directed by our customers.)

### Contact based on your call to the customer hotline of the Robert Bosch Smart Home GmbH

Provided that the transmission of personal data and technical data is voluntary, encrypted.

(Legal basis: Justified interest on our part on the elimination of faults and the safety of our offers)

### Notifications on your smartphone (push notifications)

Notifications from the Smart Home system

(Legal basis: fulfilment of contractual obligations)

### Use of analysis tools

For ensuring the availability of the service and keeping the service promise

(Legal basis: fulfilment of contractual obligations)

Smart tips or recommendations (in-app messaging) for products for app optimisation and improvement of the offerings

(Legal basis: consent)

## 3.3 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 attempts).

## 3.4 Data transfer

### Data transfer to other controllers

Your personal data is principally forwarded to other controllers only when required for the fulfillment of a contract, in the case where we or the third party have a legitimate interest in the transfer, or when your consent has been given. Particulars on the legal bases can be found in the Section ["Processing purposes and legal bases"](#). Third parties may also be other companies of the Bosch 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.

### Use of service providers

We involve external service providers with tasks such as sales and marketing services, contract management, payment handling, programming, data hosting and hotline services. All service providers are obliged to maintain confidentiality and to comply to the statutory provisions. Service providers may also be companies within or outside of the Bosch group which may be located within or outside the EU or the European Economic Area (EEA). In such a case, we will ensure an adequate level of data protection by means of agreements.

### 3.5 Integration of components provided by other providers

#### 3.5.1 Connection to systems, apps and services of other providers ("Smart Home Cloud")

With Bosch Smart Home you have control over your data. If you wish, you can share your device data with partner companies (hereinafter referred to as partners) and control your Bosch Smart Home products via their systems, apps or services.

This requires that you grant access to your Bosch Smart Home System and the generated data to the respective partner. This data may be personal.

If you want to allow the partner to access and control the system, activate the function "Mirror system in cloud" in the Bosch app. The data generated by your system or products will then be mirrored in the Bosch Smart Home Cloud. You can then allow specific partners to access and control your system and products. This is done in the following way: You open the partner's app and agree to link and control your smart home products and transfer data. If you control your smart home product through partner apps, we may need to transmit data that may be personally identifiable (e.g., room or device names).

If you have given your consent, access and control remains possible until its deactivation. If you want to end a partner's access, you can withdraw data authorisation using "Change authorisations" on the Bosch Smart Home Cloud website. If you no longer want to use mirroring of your data on the Bosch Smart Home Cloud in general, then you can deactivate this in the Bosch Smart Home app. Your mirrored data will then be erased. If you want to give a partner access to your system again, you can activate the "Bosch Smart Home Cloud" function again in the Bosch Smart Home app.

Please note:

If you want to withdraw authorisation for a specific partner, proceed as follows: You withdraw the partner's authorisation through this app and thus remove the link between the partner account and Bosch ID so that it can no longer control your Bosch products and services.

Furthermore, you should withdraw the partner's authorisation on the Bosch Smart Home Cloud website. ("More" > "Partners" > "Smart Home Cloud" > "Manage permissions"). You thus ensure that not only is the account link removed, but also the authorisation is withdrawn.

If you remove the system in the Cloud through the Bosch Smart Home System app, your mirrored data will be erased. However, the authorisations which you have granted to partners remain so that you can continue to use them in the future. If you do not want this, then you can first withdraw the partners' authorisations separately.

Insofar as you grant authorizations to a partner, you instruct us to make your data available to this partner. By activating the cloud and granting consent in the partner app, you make it clear that you agree to the transfer or exchange of your data with the partner and, if applicable, to control your Bosch Smart Home System. You or the partner are responsible for the associated data processing by the partner. The data processing carried out by the partner is subject to its terms of use and data protection regulations. Bosch has no influence on these. You will find more detailed information on data processing in the partner's terms of use and data protection regulations.

### 3.5.2 Voice control

#### *Use of Amazon Alexa*

You have the option of controlling your Smart Home products via Amazon Alexa voice commands. To do so, you have to connect your Smart Home products to Amazon Alexa. If you control your Smart Home product via Alexa, you may have to transmit personal data via Amazon to your Smart Home product and vice-versa.

If you give voice commands to Amazon Alexa in order to control Smart Home products or retrieve information from your Smart Home product, voice data are transmitted to Amazon and used by Amazon to perform the service. These data may be personal data. By connecting your Amazon Alexa and Bosch accounts and by activating skills, you make it plain that the Smart Home product installed on your system is to be controlled via Amazon Alexa and that information is to be output via Amazon Alexa and you instruct us to exchange data with Amazon Alexa in this context. You and Amazon are responsible for the data processing that is entailed. The data processing performed by Amazon is subject to Amazon's usage and privacy protection terms. Bosch has no influence on them. Please refer to Amazon's usage and privacy protection terms with regard to Alexa for more information on data processing by Amazon.

#### *Use of Google Assistant or Google Home*

You have the option of controlling your Smart Home products via Google Assistant or Google Home voice commands. To do so, you have to connect your Smart Home products to Google Assistant or Google Home. If you control your Smart Home product via Google Assistant or Google Home, you may have to transmit personal data via Google to your Smart Home product and vice-versa.

If you give voice commands to Google Assistant or Google Home in order to control Smart Home products or retrieve information from your Smart Home product, voice data are transmitted to Google and used by Google to perform the service. These data may be personal data. By connecting your Google Assistant or Google Home and Bosch accounts and by using Google Actions, you make it plain that the Smart Home product installed on your system is to be controlled via Google Assistant or Google Home and that information is to be output via Google Assistant or Google Home and you instruct us to exchange data with Google Assistant or Google Home in this context. You and Google are responsible for the data processing that is entailed. The data processing performed by Google is subject to Google's usage and privacy protection terms. Bosch has no influence on them. Please refer to Google Assistant's or Google Home's usage and privacy protection terms with regard to Google for more information on data processing by Google.

### 3.5.3 Link to Apple HomeKit

If you wish, you can connect your Bosch Smart Home products to Apple HomeKit (hereinafter referred to as Apple) and control them via Apple's Home app, Siri voice commands or third-party apps compatible with Apple HomeKit (hereinafter referred to as third-party app).

This requires that you allow Apple access to your Smart Home System, that the generated data is made available to Apple, and that data is processed by Apple to control your system. This data may be personal.

If you want to control your Smart Home System via Apple, activate the corresponding function in the Bosch app. Then connect the Smart Home System to Apple by making the other settings in Apple's app 'Home.'

Insofar as you grant authorization to Apple, you instruct us to provide Apple with your data to control the Smart Home System. By activating Apple and granting consent in Apple's Home app, you make it clear that you agree to the transfer or exchange of your data with Apple and, if applicable, to control your Bosch Smart Home products via an app from Apple or a third-party provider.

You, Apple or the third-party provider are responsible if data is processed by Apple. The data processing carried out by Apple or the third-party provider is subject to its terms of use and data protection regulations. Bosch has no influence on them. For more information on data processing, please refer to the terms of use and data protection regulations of Apple or the third-party provider.

The option to access and control via Apple will remain available until its deactivation. If you want to end the control via Apple and the associated data exchange, you can remove the link to Apple in the Bosch app.

### 3.6 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 justified interest in storing the data. 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 or are entitled to pursue our legal claims.

## **4. 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.

## **5. 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.

### 5.1 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.

### 5.2 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).

### 5.3 Restriction of data processing:

You can demand - as far as the legal requirements are fulfilled - that we restrict the processing of your data.

#### 5.4 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.

#### 5.5 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.

#### 5.6 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. In addition, processing may continue to be permitted on the basis of another legal bases.

#### 5.7 Data portability:

You are entitled to receive data that you have provided to 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.

This does not apply if a transfer affects the rights and freedoms of another person.

#### 5.8 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:

Der Landesbeauftragte für den Datenschutz und die Informationsfreiheit Baden-Württemberg

Address: Lautenschlagerstraße 20, 70173 Stuttgart, GERMANY

Postal address: P.O. Box 10 29 32, 70025 Stuttgart, GERMANY

Phone: +49 711/615541-0

Fax: +49 711/615541-15

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

## **6. Responsibility as a user**

The Smart Home system and Smart Home devices are intended for use in a private domestic environment. They are intended for private use only.

You bear responsibility for the lawful use of the devices and services and for compliance with the applicable legal provisions in the place of use. Laws in your country may stipulate permitted purposes, installation locations, selection of image sections and storage duration of the video sequences in particular. At the same time, you can contribute to the privacy-friendly use of the product as follows:

- Limit it to your private area. Avoid recording your neighbours' property or public areas outside your property and/or your home. Do not expose others to monitoring pressure which is perceived personally.
- Where necessary, inform other people (e.g. people living or staying in the monitored areas) about the use of your product in an appropriate manner, for example with a notice or a camera symbol which is recognisable in good time. Obtain any consent which may be required.
- Only activate voice transmission and/or voice recording if this is permitted in your place of use and if this is required for your legitimate purpose.
- Delete clips if you no longer need them for the intended purpose.
- Regularly check the monitored areas for changes and make any changes which may be necessary.

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

As far as the circumstances of the data processing change, we can adjust the privacy policy. Furthermore, 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, notice the current version of our data protection notice, as this is subject to change.

## **8. Contact**

If you wish to contact us, for example in connection with the processing of personal data or for the exercise of your user rights, please find us at the address stated in the "[Controller](#)" section.

If you want to unsubscribe from a newsletter, you can click on the corresponding unsubscribe link in the newsletter or tell us your request via the contact options mentioned in the "[Controller](#)" section.

To assert your data subject requests and notification of data protection incidents please use following link: <https://www.bkms-system.net/bosch-datenschutz>

For suggestions and complaints regarding the processing of your personal data, we recommend contacting our data protection officer:

Datenschutzbeauftragter  
Abteilung Informationssicherheit und Datenschutz (C/ISP)  
Robert Bosch GmbH  
Postfach 30 02 20  
70442 Stuttgart  
DEUTSCHLAND

or

Email: [DPO@bosch.com](mailto:DPO@bosch.com)

**9. Effective date**

19-07-2021