

MODOR – Smart Systems (hereinafter referred to as “MODOR”, “We” or “Us”) appreciates your visit to our website and mobile applications (together also “online offer”) and also your interest in our company and our products.

1. MODOR respects your private sphere

The protection of your private sphere during the processing of personal data as well as the security of all business data is a major concern for us that we take into consideration in our business processes. We process personal data, collected during your visit to our online offers confidentially and only in accordance with the legal directives.

Data protection and information security are an integral part of our company policy.

2. Responsible authority and contact

Responsible for the processing of your data is:

MODOR – Smart Systems
Europasingel 2
7681NA, Vroomshoop
The Netherlands
Info: info@modor.nl
Tel: +31 628404410

We recommend that you get in touch with us for Data Protection for the assertion of your rights, reporting of data protection incidents and for suggestions and complaints with regard to the processing of your personal data as well as for the revocation of your consent.

3. Processing of personal data

3.1 · Processed data categories

Communication data (e.g. name, telephone number, e-mail address, address, IP address) are processed.

3.2 · Processing principles

Personal data are all the information which relate to an identified or identifiable natural person, for example, names, addresses, telephone numbers or e-mail addresses which are the expression of the identity of a person.

We process personal data only when there is a statutory legal basis for doing so or if you have given us your consent, e.g. in the scope of a registration.

3.3 · Processing purposes and legal bases

Our delegated service providers and we process your personal data for the following objectives:

3.3.1 · Provision of this online offer

Legal basis: Predominantly, justified interest in direct marketing on our part, as long as this is carried out in compliance with data protection regulations and competition law regulations

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

- Legal basis: Predominantly, justified 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 · Determination of malfunctions and for safety reasons

- Legal basis: Fulfilment of our legal obligations in the field of data security and predominantly, justified interest in the rectification of malfunctions and the security of our offers.

3.3.4 · Our own and third party advertising as well as market research and reach measurement in accordance with the legally permissible extent resp. consent-based

- Legal basis: Consent or predominantly, justified interest in direct marketing on our part, as long as this is carried out in compliance with data protection regulations and competition law regulations.

3.3.5 · Safeguarding and defending our rights

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

3.4 · Log files

Whenever you use the Internet, specific information will be automatically transmitted from your Internet browser and stored by us in so-called log files.

We save the log files for the determination of malfunction and for safety reasons (e.g. for the investigation of attempted attacks) for a short period and delete them afterwards. If a further retention of log files is required for evidence purposes, these will be exempted from deletion until the final clarification of the respective incident and can be handed over to investigating authorities in individual cases.

The following information, in particular, is stored in the log files:

- IP address (Internet protocol address) of the end device from which the online offer is accessed;
- Internet address of the website from where the online offer has been accessed (so-called origin or referrer URL);
- Name of the service provider through which access to the online offer is achieved;
- Name of the retrieved files or information;
- Date and time as well as duration of the access;
- Transferred data volume;

- Operating system and information on the Internet browser used, including add-ons (e.g. for the flash player);
- http status code (e.g. “Inquiry successful” or “Requested file not found”).

3.5 · Transfer of data

3.5.1 · *Transfer of data to other responsible parties*

We will principally only transfer your personal data to other responsible parties insofar as if this is necessary for the contract performance, we or the third party has a predominantly justified interest in the transfer or if you have given your consent. You will find details concerning the legal bases in section “Processing purposes and legal bases” (*see no. 3.3*). Third parties can also be other companies in the Bosch Group. It will be explained in this data protection policy if data are transferred on the basis of a predominantly justified concern.

Moreover, data can also be transferred to other responsible parties, insofar as we are obligated to do this on the basis of statutory regulations or due to enforceable official or judicial order.

3.5.2 · *Transfer of data to service providers*

We assign tasks such as marketing services, programming and data hosting to external service providers. We have selected these service providers with utmost care and monitor them on a regular basis, in particular with regard to their diligent handling and protection of the data stored by them. All providers are bound to confidentiality and adherence to legal specifications.

3.5.3 · *Transfer to recipients outside the European Economic Area (EEA)*

We can also transfer personal data to recipients with headquarters outside the EEA in so-called non-member countries. In this case, we ensure before transfer that the recipient either possesses an appropriate standard of data protection (e.g. on the basis of an adequacy decision of the EU Commission for the relevant country or the agreement of so-called EU standard contractual clauses of the European Union with the recipient) or if you have consented to the transfer.

You can obtain an overview of the recipients in non-member countries and a copy of the specifically agreed regulations to guarantee the appropriate standard of data protection from us. Please use the information contained in section “Responsible authority and contact” (*see no. 2*).

3.6 · Duration of storage; retention periods

On principle, we store your data for as long as it takes for the provision of our online offer and the associated services or when we have a justified interest in further storage (e.g. after the fulfilment of a contract, we could still have a justified interest in postal marketing). In all other cases, we will delete your personal data with the exception of such data that we are obliged to retain for the fulfilment of legal obligations (e.g. as a result of fiscal and commercial retention periods, we are obliged to retain documents such as contracts and invoices for a specific period of time).

4. Use of cookies

4.1 · General

Cookies are small text files which are saved on your computer when you visit a website. If you call up this online offer again, your browser will send the content of the cookies back to the respective

provider and thus enable a recognition of the end device. The read out of cookies enables us to optimally design our online offer for you and to facilitate your utilization.

4.2 · Switch-off and deletion of cookies

Our website uses mandatory cookies (*see No. 4.3.1*). Your consent is not required for the use of mandatory cookies. The legal basis is the predominant legitimate interest on our part in the use of mandatory cookies to provide our online offer. Mandatory cookies cannot be deactivated. However, you can generally delete or refuse all cookies via your browser at any time. This can, however, mean that certain areas of the website may be restricted in their functionality. You can find the relevant information in the help functions of your browser.

When you visit our website for the first time, you will be asked in a cookie layer pop-up whether you accept cookies (*see No. 4.3.2*) that are set on our site.

The setting do not comprise cookies set by other providers during your visits to third-party Internet pages.

4.3 · Overview of the cookies we use

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

4.3.1 · *Absolutely necessary cookies*

Certain cookies are absolutely necessary for us to be able to securely provide our online offer. This category includes:

Name: privacy-accepted

Type: Permanent

This cookie will be stored for a maximum of 12 months or until you revoke your consent to the use of cookies.

Purpose:

Remembers your consent to the use of cookies for this website.

Name: privacy-settings

Type: Permanent

This cookie will be stored for 60 days max., or until you change your settings with regard to the use of cookies.

Purpose:

Remembers what cookies you have allowed for this website.

Stage 1: absolutely necessary cookies accepted

Stage 2: absolutely necessary and convenience cookies accepted

4.3.2 · *Convenience cookies*

These cookies enable us to improve the usability and performance of our websites. This category includes:

Name: geoservice

Type: Permanent

This cookie will be stored for 10 days max. or until you change your cookie settings.

Purpose:

Remembers your selection of region and country.

Name: privacy-social

Type: Permanent

This cookie will be stored for 60 days max. or until you change your cookie settings.

Purpose:

Remembers your social media settings.

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 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/>.

5.2 · Google reCAPTCHA

In certain cases we use the reCAPTCHA service of the company Google LLC to ensure appropriate data security for the use of contact forms. This serves above all for the differentiation of whether the input has been made by a natural person or fraudulently by machine or automated processing. This represents a predominant legitimate interest on our part within the meaning of article 6 section 1 lit. f GDPR. The service includes the sending of the IP address and if necessary other data required by Google for the reCAPTCHA service to Google. The deviating data protection regulations of Google LLC are applicable for this purpose.

Further information about the privacy policy of Google LLC are available at: <https://www.google.com/intl/de/policies/privacy/>.

5.3 · 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 6 section 1 lit. f GDPR.

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

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

6. Content Delivery Network of Akamai

In order to optimize the loading times of this website, we use a so-called "Content Delivery Network" (CDN), offered by Akamai Technologies, Inc., 150 Broadway, Cambridge, MA 02142, USA. This represents a predominant legitimate interest within the meaning of article 6 section 1 lit. f GDPR.

Akamai Technologies, Inc. is certified under the Privacy Shield agreement, providing a guarantee to comply with the European data protection law.

The deviating data protection regulations of Akamai Technologies, Inc. are applicable for this purpose.

Further information about the privacy policy of Akamai Technologies, Inc. are available here <https://www.akamai.com/de/de/privacy-policies/>.

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 the EU or the EEA (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 policy 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 · Social plugins of Facebook (if applicable)

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

7.3 · Social plugins from Twitter (if applicable)

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: <https://developer.twitter.com/>; you will find information on data protection at Twitter here: <https://twitter.com/de/privacy>.

7.4 · Social plugins from LinkedIn

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

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 offer can contain links to the websites of third parties – to providers who are not affiliated with us. After you click the link, we no longer have any influence on the collection, processing and utilization of any personal data that is transferred to third parties after clicking the link (for example, the IP address or the URL of the site on which the link is located), as our control of the conduct of third parties is then naturally withdrawn. We assume no responsibility for the processing of this kind of personal data by third parties.

10. Security

MODOR employees and our delegated service provider companies are obliged to maintain secrecy and to adhere to the regulations of the applicable data protection laws.

We take all necessary technical and organizational measures in order to ensure an appropriate standard of protection and to protect your data that are administered by us especially from the risks of unintentional or unlawful destruction, manipulation, loss, alteration or unauthorized disclosure or unauthorized access. Our security measures are continually improved according to the technological development.

11. Your rights

Please use the information contained in section “Responsible authority and contact” (*see no. 2*) to assert your rights. Please ensure that an unambiguous identification of your person is possible for us.

11.1 · Right to information and disclosure:

You have the right to obtain information from us concerning the processing of your data. For this purpose, you can enforce a right to information in relation to the personal information that we process from you.

11.2 · Right of rectification and deletion:

You can demand from us the rectification of false data and – insofar as the legal prerequisites are fulfilled – the completion or deletion of your data.

This does not apply to data which are necessary for invoicing or accounting purposes or are subject to the statutory retention obligation. Insofar as the access to such data is not required, the processing thereof will be restricted (*see below*).

11.3 · Restriction of processing:

You can demand from us the restriction of the processing of your data insofar as the legal prerequisites are fulfilled.

11.4 · Data portability:

You will continue to have the right to obtain data that you have provided to us transmitted in a structured, conventional and machine-readable form or as far as this is technically feasible, to demand that the data are transmitted to a third party.

11.5 · Right of objection

11.5.1 · Case-related right of objection

Insofar as we undertake processing of data on the basis of a predominantly justified interest, as represented in this data protection policy, you have the right to file an objection to this processing, at any time, for reasons resulting from your special situation.

We will then discontinue the processing of your data, unless we can prove, in accordance with the statutory regulations, mandatory reasons worthy of protection for further processing, which outweigh your interests, rights and liberties, or if the further processing serves the assertion, exercising or defending of legal claims.

11.5.2 · Objection against the processing of data for direct marketing purposes

Furthermore, you can file an objection to the processing of your personal data for commercial purposes at any time (“objection to advertising”). Please take into consideration the fact that there could be an overlapping between your objection and the utilization of your data in the scope of an ongoing campaign.

11.6 · Rights of revocation

If you have given us your consent to the processing of your data, you can revoke this with future effect at any time.

11.7 · Right to appeal to the supervisory authority

You have the right to submit an appeal to a data protection supervisory authority. For this purpose, you can refer to the data protection supervisory authority, which is competent for your place of residence of federal state or to the data protection supervisory authority which is competent for our company. The data protection supervisory authority responsible for us is ‘Autoriteit Persoonsgegevens’ based in the Hague, the Netherlands.

12. Children

This online offer is not directed at children under an age of 16 years.

13. Change of the data protection policy

We reserve the right to make modifications to our security and data protection measures, insofar as this is necessary due to the technical development. In these cases, we will also adapt our data protection policy accordingly. Therefore, please note the currently valid version of our data protection policy.

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