

# Privacy Policy

www.uwcrobertboschcollege.de

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Robert Bosch College UWC GmbH is committed to safeguarding your privacy. Contact us at [dpo@uwcrobertboschcollege.de](mailto:dpo@uwcrobertboschcollege.de) if you have any questions or problems regarding the use of your Personal Data and we will gladly assist you.

By using this site or/and our services, you consent to the Processing of your Personal Data as described in this Privacy Policy.

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## Definitions used in this Policy

- **Personal Data** – any information relating to an identified or identifiable natural person.
- **Processing** – any operation or set of operations which is performed on Personal Data or on sets of Personal Data.
- **Data subject** - a natural person whose Personal Data is being Processed.
- **Child** - a natural person under 18 years of age.
- **We/us** (either capitalized or not) –Robert Bosch College UWC GmbH

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## Data Protection Principles

We promise to follow the following data protection principles:

- Processing is lawful, fair, transparent. Our Processing activities have lawful grounds. We always consider your rights before processing Personal Data. We will provide you information regarding processing upon request.
- Processing is limited to the purpose. Our Processing activities fit the purpose for which Personal Data was gathered.
- Processing is done with minimal data. We only gather and process the minimal amount of Personal Data required for any purpose.
- Processing is limited with a time period. We will not store your personal data for longer than needed.
- We will do our best to ensure the accuracy of data.
- We will do our best to ensure the integrity and confidentiality of data.

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## Data Subject's rights

The Data Subject has the following rights:

- **Right to information** – meaning you have the right to know whether your Personal Data is being processed; what data is gathered, from where it is obtained and why and by whom it is processed.
- **Right to access** – meaning you have the right to access the data collected from/about you. This includes your right to request and obtain a copy of your Personal Data gathered.
- **Right to rectification** – meaning you have the right to request rectification or erasure of your Personal Data that is inaccurate or incomplete.
- **Right to erasure** – meaning in certain circumstances you can request for your Personal Data to be erased from our records.
- **Right to restrict processing** – meaning where certain conditions apply, you have the right to restrict the Processing of your Personal Data.
- **Right to object to processing** – meaning in certain cases you have the right to object to Processing of your Personal Data, for example in the case of direct marketing.
- **Right to object to automated Processing** – meaning you have the right to object to automated Processing, including profiling; and not to be subject to a decision based solely on automated Processing. This right you can exercise whenever there is an outcome of the profiling that produces legal effects concerning or significantly affecting you.
- **Right to data portability** – you have the right to obtain your Personal Data in a machine-readable format or if it is feasible, as a direct transfer from one Processor to another.
- **Right to lodge a complaint** – in the event that we refuse your request under the Rights of Access, we will provide you with a reason as to why. If you are not satisfied with the way your request has been handled, please contact us.
- **Right for the help of supervisory authority** – meaning you have the right for the help of a supervisory authority and the right for other legal remedies such as claiming damages.
- **Right to withdraw consent** – you have the right withdraw any given consent for Processing of your Personal Data.

You may access your data, rectify it, request its erasure, object to processing on legitimate grounds relating to your particular situation and exercise your right to data portability, at any by emailing your request along with proof of your identity to our Personal Data Protection Officer at: [dpo@uwcrobertboschcollege.de](mailto:dpo@uwcrobertboschcollege.de)

However, we are not under any obligation to erase the data we need for the purpose for which it was collected, required to ensure compliance with a statutory obligation and/or to confirm, exercise or defend rights before a court of law. You may also give instructions to our Personal Data Protection Officer on the use of your personal data after your death.

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## Data we gather

When you make a donation to UWC Robert Bosch College, for the processing of this donation, we collect the following categories of data:

- Identification data: surname, forename, postal and email address, telephone number, customer number etc.
- Billing and/or payment data: bank account details, methods of payment, bills, etc.
- User data: communications, donation receipt / tax declaration certificate etc.

While browsing our website some information is also automatically collected about you

This includes information that is automatically stored by cookies and other session tools. This includes your IP address, your language preference (etc.) This information is used to improve your browsing experience. When you use our services or look at the contents of our website, your activities may be logged.

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## How we use your Personal Data

We use your Personal Data in order to:

- provide our information service to you.
- communicating and interacting with you; and notifying you of changes to any services.
- fulfil an obligation under law or contract.

We use your Personal Data on legitimate grounds and/or with your Consent.

On the grounds of making a donation or fulfilling contractual obligations, we process your Personal Data for the following purposes:

- to identify you;
- to provide you with necessary information with regards to your donation ;
- to communicate either for invoicing and gift /donation / tax return certificate;

On the ground of legitimate interest, we Process your Personal Data for the following purposes:

- to administer and analyse our audience in order to improve the quality, availability and relevance of the provided information;

We process your Personal Data in order to fulfil obligation rising from law and/or use your Personal Data for options provided by law. We reserve the right to anonymise Personal Data gathered and to use any such data. We will use data outside the scope of this Policy only when it is anonymised. We save your billing information and other information gathered about you for as long as needed for accounting purposes or other obligations deriving from law, but not longer than 10 years as per German law § 147 AO and § 257 HGB.

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We might process your Personal Data for additional purposes that are not mentioned here, but are compatible with the original purpose for which the data was gathered. To do this, we will ensure that:

- the link between purposes, context and nature of Personal Data is suitable for further Processing;
- the further Processing would not harm your interests and
- there would be appropriate safeguard for Processing.

We will inform you of any further Processing and purposes.

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## Who else can access your Personal Data

We do not share your Personal Data with strangers. Personal Data about you is in some cases provided to our trusted partners in order to either make providing the service to you possible or to enhance your customer experience. We share your data with:

### **Our processing partners:**

- DigitalOcean – our webhosting company. DigitalOcean’s Privacy Shield Policy is available [here](#)  
Address: DigitalOcean, 101 Avenue of the Americas, 10th Floor, New York, NY 10013, USA  
Email: [privacy@digitalocean.com](mailto:privacy@digitalocean.com)
- Stripe Payments Europe Limited (“Stripe Payments Europe”)—our payment processor. Stripe’s Privacy Shield Policy is available [here](#)  
Address: C/O A&L Goodbody, Ifsc, North Wall Quay, Dublin 1., Ireland  
Email: [privacy@stripe.com](mailto:privacy@stripe.com).

### **Our Business partners:**

- HBM Hecht Bingel Müller & Partner – our accounting partner. HBM’s privacy policy is available [here](#)  
Address: Heinrich-von-Stephan-Straße 20, 79100 Freiburg, Deutschland  
Email: datenschutz@hbm-partner.de

#### Connected third parties:

- Mailchimp – our newsletter service. Mailchimp’s privacy policy is available [here](#)  
Address: 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA  
Email: privacy@mailchimp.com

We only work with Processing partners who are able to ensure adequate level of protection to your Personal Data. We disclose your Personal Data to third parties or public officials when we are legally obliged to do so. We might disclose your Personal Data to third parties if you have consented to it or if there are other legal grounds for it.

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## How we secure your data

We do our best to keep your Personal Data safe. We use safe protocols for communication and transferring data (such as HTTPS). We use anonymising and pseudonymising where suitable. We monitor our systems for possible vulnerabilities and attacks.

Even though we try our best we cannot guarantee the security of information. However, we promise to notify suitable authorities of data breaches. We will also notify you if there is a threat to your rights or interests. We will do everything we reasonably can to prevent security breaches and to assist authorities should any breaches occur.

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## Cookies and other technologies we use

We use cookies and/or similar technologies to administer the website and to collect information about users. This is done in order to personalise and enhance your experience with us.

A cookie is a tiny text file stored on your computer. Cookies store information that is used to help make sites work. Only we can access the cookies created by our website. You can control your cookies at the browser level. Choosing to disable cookies may hinder your use of certain functions.

We use cookies for the following purposes:

- Necessary cookies – these cookies are required for you to be able to use some important features on our website, such as logging in. These cookies don't collect any personal information.
- Functionality cookies – these cookies provide functionality that makes using our service more convenient and makes providing more personalised features possible. For example, they might remember your name and e-mail in comment forms so you don't have to re-enter this information next time when commenting.
- Analytics cookies - these cookies are used to track the use and performance of our website and services

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You can remove cookies stored in your computer via your browser settings. Alternatively, you can control some 3rd party cookies by using a privacy enhancement platform such as [optout.aboutads.info](https://optout.aboutads.info) or [youronlinechoices.com](https://youronlinechoices.com). For more information about cookies, visit [allaboutcookies.org](https://allaboutcookies.org).

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## Contact Information

### Data Protection Officer

If you have any questions regarding Processing your Personal Data, your rights regarding your Personal Data or this Privacy Policy, contact our Data Protection Officer **Thomas Drössel** at [dpo@uwcrobertboschcollege.de](mailto:dpo@uwcrobertboschcollege.de)

### Supervisory Authority in Germany

Email: [poststelle@bfdi.bund.de](mailto:poststelle@bfdi.bund.de)

Phone: +49 228 997799 0

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## Changes to this Privacy Policy

We reserve the right to make change to this Privacy Policy.

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*The German version of this policy is the legal version of reference. It has been translated into English for ease of understanding by non-German users*

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V1.0 - 06/2018

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