

# **Privacy Policy**

Donors

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

By donating to our College, 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

# 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.

# 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

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.

# 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.

# 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;
- to communicate more general information about the College and its activities;

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.

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 safeguarding for Processing.

We will inform you of any further Processing and purposes.

### 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 affiliated partners:

- UWC International the organisation at the centre of the UWC movement. UWC International Privacy Policy is available <a href="here">here</a>
  Address: UWC International, 2nd Floor, 17-21 Emerald Street, London WC1N 3QN, UK Email: <a href="mailto:dataprotectionofficer@uwcio.uwc.org">dataprotectionofficer@uwcio.uwc.org</a>
- Robert Bosch Stiftung GmbH our parent company. Robert Bosch Stiftung GmbH's Privacy Policy is available here

Address: Robert Bosch Stiftung GmbH, Heidehofstr. 31, 70184 Stuttgart, Germany Email: datenschutz@bosch-stiftung.de.

#### **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

Monika Fink – our graphic designer.

Address: Monika Fink, Brunnenstraße 154, 10115 Berlin

Email: monika.fink@gmx.net

#### **Connected third parties:**

Mailchimp – our newsletter service. Mailchimp's privacy policy is available <a href="here">here</a>
 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.

# 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.

# **Contact Information**

#### **Data Protection Officer**

If you have questions regarding the processing of your personal data, your rights concerning your personal data, or this privacy policy, please contact our external data protection officer "Freiburger Datenschutzgesellschaft mbH" at <a href="mailto:info@freiburger-datenschutzgesellschaft.de">info@freiburger-datenschutzgesellschaft.de</a>

#### **Supervisory Authority in Baden-Württemberg**

Der Landesbeauftragte für den Datenschutz und die Informationsfreiheit Baden-Württemberg

Email: poststelle@ lfdi.bwl.de

Phone: +49 711 615541 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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