

Data privacy policy according to Art. 13 UK-GDPR – BLANCO UNIT App

Preamble

This service (hereinafter referred to as the "App") is provided by BLANCO GmbH + Co. KG (hereinafter referred to as "we" or "us") as the controller within the meaning of the applicable data protection law.

As part of the app, we enable you to retrieve and display the following information: The app enables you to control digital BLANCO products via Bluetooth. In addition to remote water dispensing, the control system also includes the individualization of your BLANCO product. This includes setting the temperatures, water hardness as well as additional device features. In addition, the app enables a quick purchase of suitable consumables such as filters and CO2 cylinders and supports the replacement process with animated step-by-step instructions. Complete statistics on product usage are also available. In the event of any malfunctions, a remote service of the product can be requested via the app.

When you use the app, we process personal data about you. Personal data means any information relating to an identified or identifiable natural person. Because the protection of your privacy when using the app is important to us, we would like to inform you with the following information about which personal data we process when you use the app and how we handle this data. In addition, we will inform you of the legal basis for the processing of your data and, to the extent that the processing is necessary for the purposes of our legitimate interests, also of our legitimate interests.

You can access this privacy policy at any time under the "Privacy" menu item within the app.

Name and contact details of the controller

BLANCO GmbH + Co KG
Flehinger Straße 59
75038 Oberderdingen
Phone: +49 7045 44-81100
E-mail: info@blanco.de

in joint responsibility with:

BLANCO Austria Küchentechnik GmbH
Ignaz-Köck-Straße 11
1210 Vienna
Austria
Phone: +43 12782823
E-mail: office@blanco.at

BLANCO UK Ltd.
1 Victor Way, Colney Street
St. Albans AL2 2FL
United Kingdom
Phone: +44 1923 635200
E-mail: info@blanco.co.uk

BLANCO GmbH + Co. KG
Steinhausen Branch
Hinterbergstrasse 38b
6312 Steinhausen
Switzerland
Phone: +41 62 3888990
E-mail: blanco@blanco.ch

Contact details of the Data Protection Officer and the Data Protection Team

If you have any questions about data protection, you can contact our data protection team at the e-mail address: datenschutz-kt@blanco.de .

You can contact our data protection officer at the above postal address with the addition - Data Protection Officer- or the e-mail address: datenschutzbeauftragter@blanc-fischer.com.

Scope of the data protection notice:

This privacy policy applies to the services within the app. To use all functions, registration within the app is necessary. Other data protection notices apply to other services offered, such as purchases, product registrations, newsletter registrations, etc. Information on this data processing can be found in separate data protection notices at an appropriate location.

1. Information on the processing of your data

Certain information is already processed automatically as soon as you start using the app. We have listed exactly which personal data is processed for you below:

1.1 Information that is available at the time of download of the app

When downloading the app, certain required information is transmitted to the app store you have selected (e.g. Apple App Store or Google Play Store), in particular the user name, e-mail address, customer number of your account, time of download, payment information and the individual device identification number may be processed. In addition, the app store independently collects various data and provides you with analysis results. The processing of this data is carried out exclusively by the respective app store and is beyond our sphere of influence. We process the data only insofar as it is necessary for the download of the mobile app on your mobile device.

Apple App Store: <https://www.apple.com/de/legal/privacy/de-ww/>

Google Play Store: <https://policies.google.com/privacy>

1.2 Information Collected Automatically

When using the mobile app, we process the personal data described below automatically transmitted (1) to enable convenient use of the features, (2) to provide you with the service and related features; (3) improve the functions and performance characteristics of the App and (4) prevent and eliminate misuse and malfunctions:

- IP address
- Device ID
- App ID

- Time of access (date and time of request)
- Time zone difference to Greenwich Mean Time (GMT)
- Content of the request (page visited)
- Access status/HTTP status code
- Amount of data transferred in each case
- Previously visited page
- Browser
- Operating system
- Language and version of the browser software.

This data processing is justified by the fact that (1) the processing is necessary for the performance of the contract between you as a data subject and us in accordance with Art. 6 para. 1 sentence 1 lit. b UK-GDPR for the use of the app or (2) we have a legitimate interest in ensuring the functionality and error-free operation of the app and being able to offer a service that is in line with the market and interests, that your rights and interests in the protection of your personal data within the meaning of Art. 6 para. 1 sentence 1 lit. f UK-GDPR prevail here.

Encryption

The app and the product use SSL or TLS encryption for security reasons and to protect the transmission of personal data and other confidential content with the BLANCO cloud. Direct communication between app and device via Bluetooth is also appropriately encrypted.

1.3 How to use the app

As part of the app, you can enter, manage and edit various information, tasks and activities, which are described below. This information includes, in particular, data via the BLANCO UNIT app. The app also requires the following permissions:

- Messages
- Bluetooth
- Location Services (for the WiFi Manager)

The processing and use of usage data is carried out for the purpose of providing the service. This data processing is justified by the fact that the processing is necessary for the fulfilment of the contract between you as a data subject and us in accordance with Art. 6 para. 1 sentence 1 lit. b UK-GDPR for the use of the app. On your device, you have the option of adjusting the corresponding settings and permissions at any time.

Categories of personal data

In the context of the use of the app, different types of personal data may be processed. These could include, but are not limited to, the following:

Serial number:

Is an alphanumeric designation used to uniquely identify a device. The serial number serves as an identifier for elements that have been used in a series and contains indications of the production conditions.

Service Code:

The service code is a number that is randomly generated by the device itself.

Device ID:

The device ID consists of merging two different random device codes. Only if you provide us with both codes can we replicate the device ID and then assign the data to your machine in the cloud. Otherwise, it will not be possible for us to assign the information directly to you.

App ID:

The app ID is an identifier that consists of the system time (time of the request) and a random number generated by the cloud. This is not readable by us.

Pairing Code:

5-digit code, which can be found on the nameplate behind the CO2 cylinder. At the factory, these are the last 5 digits of the serial number. This will connect the device to the app. The pairing code can also be replaced by a custom 5-digit numeric code.

Device data:

The device data consists of e.g. error/warning/notification messages, device settings, usage data or system information.

IP address:

Is a unique identifier of an end device to define the location on the Internet.

Consumption and usage information:

This includes water references (water type, quantity, time) or event information such as: cleaning completed, CO2 filter exhausted, update completed, etc...

Access data (username and password):

Username and password are stored in the app's safe storage at the user's request to enable a quick and convenient login.

Purposes and legal bases of data processing

Within the framework of the App, you have various options available to you, for the purposes of which different personal data are processed:

- **Registration within the BLANCO app**
Registration is required to make full use of all functions in the BLANCO app. The following personal data is collected and processed: e-mail address, username, password and, if applicable, other user data.
This includes, among other things, the functions such as setting the user's personal preference P1-P4, setting CO2 intensity, deactivating hot water mode, adjusting the water hardness, calibration, remote triggering water (Bluetooth) with 10 ml step-by-step (without app only in 25 ml or 50 ml increments), Extended 1st level support (through the app, 1st level support can perform a remote analysis of the valve), Statistics & push notifications (total output in liter, number of individual purchases, conversion of the total output into different container sizes, display of the distribution of the output of different water types, etc.).
The legal basis for data processing is the contractual user relationship in accordance with Art. 6 para. 1 sentence 1 lit. b UK-GDPR.
- **Product control and management of several BLANCO products**

Here you have the possibility to change device settings such as the setting of the water quantity and water type (still, medium, classic), to start the water delivery, temperature of the water, filter and water hardness configuration including the control of the cleaning process, individualization of the CO2 intensities of the water types, calibration as well as to control the product via your app.

The legal basis for data processing is the contractual user relationship in accordance with Art. 6 para. 1 sentence 1 lit. b UK-GDPR.

- Display of device statuses (fill levels)

The app provides you with the function of displaying the filter and cleaning status (FD value) in %, the CO2 status in % as well as settings, e.g. the temperature.

The legal basis for data processing is the contractual user relationship in accordance with Art. 6 para. 1 sentence 1 lit. b UK-GDPR.

- Consumption statistics

The app provides you with daily, weekly, monthly and annual statistics on water expenditure and water types, allowing you to view your consumption and usage. An assignment to you by us is not possible, unless you give us permission, e.g. for remote service.

The legal basis for data processing is the contractual user relationship in accordance with Art. 6 para. 1 sentence 1 lit. b UK-GDPR.

- Notifications via push notifications

Via the app, you have the option of receiving notifications in the form of push notifications. You can be notified of errors, warnings and other messages including suggested solutions, such as the condition of the filters or CO2 cartridge, notifications about the cleaning and filter replacement process, cleaning errors and other useful messages. To do this, you can provide consent to the app on your mobile device.

In accordance with Art. 6 para. 1 sentence 1 lit. a UK-GDPR, the legal basis for data processing is consent, which you can set on your mobile device in the form of the corresponding authorization via the Apple Notification Service / Google Cloud Messaging Service. Consent is voluntary and does not need to be given. If you do not want to give consent in the notifications, you will not receive push notifications.

You must revoke your consent at any time by making the settings on your mobile phone regarding the app in the Apple Notification Service / Google Cloud Messaging Service accordingly.

- Firmware Updates

Firmware updates may be performed as part of the app's use. These are used to update the system to keep it up to date. When the device is connected to the Internet, the device receives information from the cloud that a new firmware update is available. To start, however, a Bluetooth connection from the device to the app is necessary and must be started by you.

The legal basis for data processing is the contractual user relationship in accordance with Art. 6 para. 1 sentence 1 lit. b UK-GDPR.

- Factory Reset

App Reset

The app reset is triggered on the app and results in the deletion of all local data of the app as well as the resolution of all pairings of the app with the cloud. As an app user, you will no longer have access to the devices previously connected to the app. If an app reset is performed, it only affects the app. The app ID will be deleted wherever it was included. There is no longer access to data in a specific device ID. The device and the data about the device in the cloud are retained.

Device Reset

The device reset is triggered on the device and results in a reset of the consumer firmware as well as all local data on the device (such as settings, Wi-Fi connection, etc.) The device needs to be set up again. No more data will be sent to the cloud until the device has been set up and reconnected. The data stored in the cloud is retained. In addition, if a device reset is performed, the device remains connected to the apps.

Data Reset

The data reset is triggered on the app and erases all data related to a device in the cloud (such as all data packets, pairings, etc.). All cloud data related to a device will be deleted. There is no longer a device history, no connection to an app, and none of the app users who were connected to the device can see data or see or control the device. This process cannot be undone. If a data reset is performed, it will delete all data in the cloud that belongs to a specific device ID, the apps will no longer have access to the device or data.

The legal basis for data processing is the contractual user relationship in accordance with Art. 6 para. 1 sentence 1 lit. b UK-GDPR.

- Other additional features

In the app, you have access to additional functions, such as instructions and instructions on how to clean and change the filters or how to change the CO2 cartridge in step-by-step instructions. In addition, you will receive further support for user guidance through different animations.

- Adjust water hardness to help with filter configuration
- Read the device information such as the firmware version of the main controller, the firmware version of the connectivity controller and the network configuration (+ MAC addresses) as well as connection statistics
- Setting of personalization P1 – P4 (water type, quantity, individual CO2 content)
- Setting whether an extension set has been used
- Changing the Pair Code
- Adjustment of the CO2 content for water type Medium and Classic
- Fault manual and troubleshooting measures
- Factory

The legal basis for data processing is the contractual user relationship in accordance with Art. 6 para. 1 sentence 1 lit. b UK-GDPR.

- Customer Service BLANCO Cloud Watch

Via the app, you have the option of reaching the BLANCO customer service (Cloud Watch). To do this, choose one of the communication channels mentioned. With the help of the serial number and the service code, which you would have to read in the device information via the app and communicate to the customer service, the customer service can generate the necessary device ID. This allows customer service to have access to the data and information of your device. As a result, errors and discrepancies can be checked by customer service and a solution can be provided to you. Access to this data using the generated device ID is only temporary and will be terminated once your problem has been fully resolved.

The legal basis for data processing is the contractual user relationship in accordance with Art. 6 para. 1 sentence 1 lit. b UK-GDPR.

- Development-related analyses

In addition, we carry out analyses during development in order to identify possible errors, but also to obtain adjustments to existing models as well as insights for the development and improvement of future products. Among other things, consumption data, firmware statuses and system statuses are analysed. This is done anonymously or pseudonymously, so that no direct assignment to you is possible. An assignment of the information is only possible by

yourself. It would only be possible for us to release it to us by stating your serial number and the service code.

The legal basis for data processing is our legitimate interest in accordance with Art. 6 para. 1 sentence 1 lit. f UK-GDPR, which lies in the stabilization, troubleshooting and improvement of our products as well as for product development.

- **How to contact us**

You can also use the app to contact us if you have any questions, suggestions or other concerns. In addition to the telephone number, you can also use the contact form.

The legal basis for data processing is in accordance with Art. 6 para. 1 sentence 1 lit. b UK-GDPR if the request is related to the contractual user relationship. In all other cases, the legal basis for data processing is our legitimate interest in receiving your request and responding to it properly.

- **Reordering of consumables and spare parts as well as product registration**

If you need spare parts or consumables such as filters, CO2 cartridges, cleaning materials as well as drinking accessories or other products, you can visit our online shop. You can also register a product for your device. You can go directly to the online shop via the app and place orders as well as product registrations. If you want to visit our online shop, you will be redirected to it. In the process, data processing takes place. You will be informed about this in the corresponding data protection information, which will be made known to you when you are forwarded to the online shop.

- **Use of anonymous and aggregated data**

We have the option of anonymising and aggregating the personal data processed as part of the BLANCO UNIT app. While maintaining anonymity, we may use all data generated in this way for our own purposes, such as statistical evaluations, industry comparisons, benchmarking, product improvements, new product developments and other comparable purposes. Anonymised or aggregated data is no longer considered personal data and is not covered by any obligation to disclose or delete data. We are entitled to use and store such data for our own purposes beyond the end of the contract.

Changes of purpose

Your personal data will only be processed for purposes other than those described if this is permitted by law or if you have consented to the changed purpose of the data processing. In the event of further processing for purposes other than those for which the data was originally collected, we will inform you of these other purposes and provide you with any other relevant information prior to further processing.

Recipients or categories of recipients of the personal data

The personal data of the app is processed by responsible persons of Blanco GmbH + Co KG. It is possible that other companies in the BLANCO Group, as well as the B&F Group, to which we belong, may have access to your personal data in order to fulfil the purposes. These can be, for example, the individual national subsidiaries in order to be able to provide customer service.

Other recipients are Blanc und Fischer IT Services GmbH for the maintenance of the IT infrastructure and the provision of the corresponding software applications.

Systems from the following companies are used as service providers and software applications: Microsoft Ireland Operations Ltd., Amazon Web Services EMEA Sarl, IBM Deutschland GmbH, Codeatelier GmbH, ACT Smartware GmbH. Corresponding order processing agreements have been concluded with the service providers.

In addition to the cases explicitly mentioned in this privacy policy, further disclosure of your personal data without your explicit prior consent will only take place if it is legally permissible or required. This may be the case, inter alia, if the processing is necessary to protect the vital interests of the user or another natural person.

If it is necessary to investigate unlawful or abusive use of the app or for legal prosecution, personal data will be forwarded to law enforcement authorities or other authorities and, if necessary, to injured third parties or legal advisors. However, this only happens if there are indications of illegal or abusive behaviour. Disclosure may also take place if this serves to enforce terms of use or other legal claims. We are also required by law to provide information to certain public bodies upon request. These are law enforcement authorities, authorities that prosecute administrative offences that are subject to fines, and the tax authorities.

Transfer to third countries

Data will be transferred to third countries. Data processing generally takes place in the EU, where the personal data is processed and stored. There is an adequacy decision with the EU on an adequate level of data protection. In the context of joint responsibility, it could be the case that access by BLANCO companies from a third country is necessary for the above-mentioned purposes.

Storage Period, Deletions and Legal Retention Obligations

The personal data will only be processed for as long as it is necessary to achieve the purposes. This is basically the case if you do the deletion by resetting to factory settings. Please note the different deletion options (app reset, device reset or data reset). If a processing operation is based on consent, your personal data will be deleted if you withdraw your consent.

This does not affect statutory retention obligations. In this case, the personal data will be restricted in such a way that it will only be stored for the purpose of fulfilling statutory retention obligations.

In addition, we have the option of anonymizing your personal data so that no reference can be made to you. In this case, no further deletion will take place.

Right of access, rectification, erasure, restriction, data portability and objection

As a data subject, you have the right of access (Art. 15 UK-GDPR), rectification (Art. 16 UK-GDPR), erasure (Art. 17 UK-GDPR) of your data and restriction of processing (Art. 18 UK-GDPR), as well as a right to data portability (Art. 20 UK-GDPR) and the right to object (Art. 21 UK-GDPR) at any time. To do so, please contact the responsible body using the contact details provided.

Right to object

Insofar as the processing of your personal data is carried out for the purposes of legitimate interests pursuant to Article 6(1)(f) of the UK GDPR, you have the right to object to the processing of such data at any time on grounds relating to your particular situation in accordance with Article 21 of the UK GDPR. We will then no longer process this personal data unless we can demonstrate compelling legitimate grounds for the processing. These must override your interests, rights and freedoms, or the processing must serve to assert, exercise or defend legal claims. You can send your objection directly to datenschutz-kt-blanco.de by e-mail.

Right to lodge a complaint

As a data subject, you can contact a supervisory authority at any time in the event of complaints. The supervisory authority responsible for us is the State Commissioner for Data Protection and Freedom of Information Baden-Württemberg, Lautenschlagerstraße 20, 70173 Stuttgart, Tel.: +49 711 615541 0, E-Mail: poststelle@lfdi.bwl.de. A list of the other German supervisory authorities with contact details can be found via the following link: <https://www.bfdi.bund.de/DE/Service/Anschriften/Laender/Laender-node.html> or European supervisory authorities under the following link: <https://www.bfdi.bund.de/DE/Service/Anschriften/Europa/Europa-node.html>.

Existence of a necessity for the provision of personal data

The provision of the data for the aforementioned purposes is necessary, otherwise it will not be possible to carry out the corresponding functions for the fulfilment of the necessary purposes. Otherwise, the functionality of the app cannot be ensured.

10. Changes to this Privacy Policy

We will always keep this Privacy Policy up to date. For this reason, we reserve the right to change them from time to time and to update changes in the collection, processing or use of your data. The current version of the privacy policy is always available under "Data Protection" within the app.

Last updated: November 2023