

Privacy policy for my.webasto.net and selfservice.webasto.net
Status: July 2024

This website is operated by Webasto Roof & Components SE. In this privacy policy, you will find information on how we handle your personal data when you visit and use the functionalities we offer on this website.

1. Responsible body and data protection officer

Webasto Roof & Components SE ("**Webasto**"), Kraillinger Str. 5, 82131 Stockdorf, Germany, is responsible for the processing of personal data on this website within the meaning of Art. 4 No. 7 of the General Data Protection Regulation ("**GDPR**"). For more information about us, please refer to our [legal notice](#).

You can reach our data protection officer, Mr Manfred Gerlach, at dataprotection@webasto.com or by telephone on +49 (89) 8 57 94 - 0.

2. General information

Below you will find out what type of personal data is collected and processed by us, for what purpose and on what legal basis. Personal data is all data that enables your person to be identified (e.g. name, address, e-mail addresses). We also inform you about your rights vis-à-vis us as the controller.

3. Data processing on this website

3.1. When using this website for information purposes only (when you use the website without registering or transmitting other personal data to us), we only collect and store technically necessary data that is automatically transmitted to us via your browser in the form of server log file information. This includes the following information:

- IP address
- Date and time of the enquiry
- Time zone different to Greenwich Mean Time (GMT)
- Content of the request (specific page)
- Access status/http status code
- The amount of data transferred in each case
- Website from which the request comes
- Browser, operating system and its interface
- Language and version of the browser software

3.2. This data is technically necessary for us to display this website to you and to ensure stability and security. The temporary storage of the IP address by the system is necessary to enable the website to be delivered to your computer. For this purpose, your IP address must remain stored for the duration of the session.

3.3. Data is collected and stored in log files to ensure the functionality of the website. We also use the data to optimize the website and to ensure the security of our information technology systems.

3.4. The legal basis for the collection and temporary storage is § 25 Para. 2 No. 2

TTDSG in conjunction with Art. 6 Para. 1 S. 1 lit. f GDPR. Our legitimate interest pursuant to Art. 6 para. 1 sentence 1 lit. f GDPR lies in the above-mentioned purposes.

3.5. This data is stored on servers in the European Union. They are deleted as soon as they are no longer required to fulfil the purpose for which they were collected. In the case of the collection of data for the provision of the website, this is the case when the respective session has ended. If the data is stored in log files, this is the case after 12 months at the latest.

3.6. The collection of data for the provision of the website and the storage of data in log files is absolutely necessary for the operation and delivery of the website. Consequently, the user has no option to object.

4. Further data processing on our website

In addition to the collection and storage of log files, our website processes other personal data about you. You can find out below what this data is, for what purposes we process it and on what legal basis.

4.1. Consent processing system (Usercentrics)

4.1.1. Webasto uses a consent processing system from the provider Usercentrics to implement your usage preferences according to your wishes.

4.1.2. Data collected through the consent processing system:

- Opt-in and opt-out data
- Referring URL
- User agent
- User settings
- Consent ID
- Date of consent
- Type of consent
- Version of the template
- Language of the banner
- IP address
- Geographical location

4.1.3. The legal basis for the processing of personal data using the Consent Management Tool is the fulfilment of a legal obligation pursuant to Art. 6 para. 1, sentence 1, lit. c GDPR and § 25 para. 2 no. 2 TTDSG.

4.1.4. The data is stored and processed in the European Union (Belgium).

4.1.5. We process your personal data for these purposes only for as long as is necessary to fulfil the purpose and generally for no longer than 14 months. Beyond this, we only store personal data for the assertion of or defence against legal claims or for as long as there are legal obligations to store it.

4.2. **User analysis (Matomo)**

4.2.1. Webasto uses the Matomo software for the purpose of optimising this website in order to be able to evaluate user information.

4.2.2. The user analysis collects the following information:

- Anonymised IP address
- Browser information
- Date and time of the page view
- Device data
- List of files that have been clicked or downloaded
- Geographical location
- Links that were clicked and used to leave the page
- Number of page visits
- Page title
- Referrer URL
- Screen resolution
- Times of the first and last page view
- Time zone
- Usage data
- User agents
- UserID
- URL of the page visited

4.2.3. The legal basis for the use of Matomo is your consent in accordance with Art. 6 para. 1, sentence 1, lit. a) GDPR and § 25 para. 1 TTDSG.

4.2.4. The data is processed within the European Union.

4.2.5. You can withdraw your consent at any time without affecting the lawfulness of processing based on consent before its withdrawal. You can revoke your consent via our consent management tool.

4.2.6. Information from the third-party provider: InnoCraft, 150 Willis St, 6011 Wellington, New Zealand.

4.2.7. We process your personal data for these purposes (i) until you revoke your consent with effect for the future or (ii) for as long as this is necessary to achieve the purpose, but generally no longer than 13 months. Beyond this, we only store personal data for the assertion of or defence against legal claims or for as long as there are legal obligations to store it.

4.3. **Fontawesome**

4.3.1. Webasto uses fonts from external providers to optimise the presentation of its website.

4.3.2. When using external fonts, the following information is processed:

- IP address
- Referrer URL

4.3.3. The legal basis for the use of Fontawesome is your consent in accordance with Art. 6 para. 1, sentence 1, lit. a) GDPR and § 25 para. 1 TTDSG.

4.3.4. The data is processed in the United States of America.

4.3.5. You can withdraw your consent at any time without affecting the lawfulness of processing based on consent before its withdrawal. You can revoke your consent via our consent management tool.

4.3.6. Data from the third-party provider: Fonticons. Inc, 6 Porter Road, Apartment 3R, Cambridge, MA 02140, United States of America.

4.3.7. We process your personal data for these purposes (i) until you revoke your consent with effect for the future or (ii) for as long as this is necessary to achieve the purpose, but generally no longer than 24 months. Beyond this, we only store personal data for the assertion of or defence against legal claims or for as long as there are legal obligations to store it.

5. **Further data processing in the general area of the website for end customers (without entering log-in data)**

Our website offers various functionalities in a general and a password-protected login area (see section 6 of the privacy policy). This involves the processing of additional personal data about you. You can find out below what data this is, for what purposes we process it and on what legal basis.

5.1. **Dealer Locator**

5.1.1. The Dealer Locator is a publicly accessible function that allows you to search for authorised Webasto dealers who sell and install Webasto products ("**Webasto partners**"). You can use the Dealer Locator to request a customised quote on the conditions and costs of installing a selected Webasto product directly from the Webasto partner for your vehicle. Webasto uses the SAP CommerceCloud for this purpose.

5.1.2. There is a contact form on our website that can be used to contact us electronically. If you use this option, the data entered in the input mask (title, first name, surname, address, country, e-mail address and telephone number) will first be transmitted to us. We will then forward this data to the Webasto partner (dealer) you have selected on behalf of the respective dealer. The respective dealer is responsible for this and the subsequent processing of your data.

5.1.3. The processing of data to carry out the dealer search is based on the legal basis of contract fulfilment pursuant to Art. 6 para. 1 lit. b. GDPR. GDPR.

5.1.4. Webasto stores the data of your enquiry for a maximum period of 6 weeks and will then delete your personal data completely from the system.

5.2. **Product registration**

5.2.1. Product registration enables the Webasto Partner to register sold Webasto products in the log-in area (see Section 6.2) in order to fulfil the requirements of certain processes (e.g. discount campaigns) and/or to facilitate the handling of certain processes, such as warranty claims, or to document a warranty extension.

During product registration, the Webasto partner collects and processes the following personal data of your own customers via an input mask on the website:

- Serial number of the Webasto product sold
- Invoice number
- Chassis number of the vehicle or ship in which the Webasto product was installed.

5.2.2. Depending on the product purchased and registered, the legal basis for the processing in this case is either Art. 6 para. 1, sentence 1, lit. b GDPR, if the product registration results from the fulfilment of a contractual obligation (e.g. in the case of a warranty extension), or Art. 6 para. 1, sentence 1, lit. f GDPR. Our legitimate interest pursuant to Art. 6 para. 1, sentence 1 lit. f GDPR lies in the above-mentioned purposes of processing.

5.2.3. The data is processed within the European Union.

5.2.4. We process product registrations in our CRM system Microsoft Dynamics 365 for Sales.

5.2.5. We process your personal data for these purposes for as long as this is necessary to fulfil the purpose. Beyond this, we only store personal data for the assertion of or defence against legal claims or as long as there are legal obligations to store it.

5.3. **Hotline enquiries**

5.3.1. The Hotline Enquiries functionality is available to Webasto partners in the log-in area (see Section 6.3). Webasto partners can use this module to draw Webasto's attention to incidents in connection with Webasto products and enquire about the solution to technical problems. Personal data of Webasto partners' customers may also be processed in this context.

5.3.2. As part of the enquiry, the chassis number of the vehicle in which the Webasto product was installed by the Webasto partner and the serial numbers of the product are recorded using an input mask, if this is helpful in solving the problem.

5.3.3. The legal basis for the collection and processing is Art. 6 para. 1, sentence 1, lit. f GDPR. Our legitimate interest pursuant to Art. 6 para. 1, sentence 1, lit. f GDPR lies in the above-mentioned purposes of processing.

5.3.4. The data is processed within the European Union.

5.3.5. We process product registrations in our CRM system Microsoft Dynamics 365 for Sales.

5.3.6. We process your personal data for these purposes for as long as this is necessary to fulfil the purpose, but generally for no longer than 12 months. Beyond this, we only store personal data for the assertion of or defence against legal claims or for as long as there are legal obligations to store it.

6. Further data processing on this website in the password-protected log-in area for Webasto partners

6.1. Order via B2B Shop

6.1.1. As a Webasto partner, you can order Webasto products via the web shop. Your company and user data stored in the CRM system will be transmitted for this purpose. It is not possible to enter any other information. If a product does not have a price in the shop, you can initiate a price enquiry.

6.1.2. When you place an order or initiate a price enquiry, the following data is transmitted:

- Company name
- ERP customer number
- First name
- Surname
- Email address

6.1.3. The legal basis for the processing in this case is Art. 6 para. 1, sentence 1, lit. b GDPR.

6.1.4. Processing takes place exclusively in the European Union.

6.1.5. Webasto uses SAP CommerceCloud to provide this function.

6.1.6. Webasto transfers your order to the merchandise management system of the national company responsible for you and creates a corresponding order there. The information in the online shop is stored for a maximum period of 6 months.

6.2. Product registration

6.2.1. Webasto offers product registration for the settlement of sales subsidies/discounts as well as for possible warranty processing or for the use of additional services.

6.2.2. The Webasto partner collects and processes the following information during product registration:

- Company name
- address

- Company telephone number
- Company email address
- Surname and first name of the employee who carries out the product registration.

6.2.3. The legal basis for the processing in this case is Art. 6 para. 1, sentence 1, lit. b GDPR.

6.2.4. The data is processed within the European Union.

6.2.5. We process product registrations in our CRM system Microsoft Dynamics 365 for Sales.

6.2.6. We process your personal data for these purposes as long as this is necessary to fulfil the purpose. Beyond this, we only store personal data for the assertion of or defence against legal claims or as long as there are legal obligations to store it. The information is then anonymised by Webasto.

6.3. **Hotline enquiries**

6.3.1. If you submit a hotline enquiry via the input screen to process an enquiry to solve technical problems and/or incidents in connection with Webasto products, Webasto collects the following data of the logged-in Webasto partner and assigns it to the enquiry:

- First name and surname of the registered user
- Your details in connection with the enquiry and the associated correspondence

6.3.2. The legal basis for the collection and processing is the fulfilment of the contract (Art. 6 para. 1, sentence 1, lit. b GDPR). The processing takes place in order to be able to answer your enquiry.

6.3.3. The data is processed within the European Union.

6.3.4. We process the collected data in our CRM system Microsoft Dynamics 365 for Sales.

6.3.5. Enquiries to the hotline were stored for a maximum period of 12 months after the ticket was closed.

6.4. **Access Management and Self Service Profile**

6.4.1. In this area you can register as a Webasto partner for the first time

6.4.2. We process the following information from employees of the Webasto partner: ○

- First name
- Surname
- Job title

- Gender
- Language
- Business email address
- Fax business
- Business phone
- Business mobile phone
- Street
- Location
- Federal state/canton
- Postcode
- Country/Region

and the following general information from the Webasto partner:

- Email address
- Fax number
- Website
- Telephone number

6.4.3. The legal basis for the processing in this case is Art. 6 para. 1, sentence 1, lit. b GDPR.

6.4.4. The data is processed in the CRM system SE within the European Union.

6.4.5. We process your personal data for these purposes for as long as this is necessary to fulfil the purpose. Beyond this, we only store personal data for the assertion of or defence against legal claims or as long as there are legal obligations to store it.

6.5. **Training registration**

6.5.1. The training registration enables employees of Webasto partners to register for online and on-site training courses on Webasto products.

6.5.2. When you register for training, we process the first and last names of the registered employees.

6.5.3. The legal basis for the processing in this case is Art. 6 para. 1, sentence 1, lit. b GDPR.

6.5.4. Processing takes place in the CRM system within the European Union.

6.5.5. We process your personal data for these purposes for as long as this is necessary to fulfil the purpose, but generally for no longer than 36 months. Beyond this, we only store personal data for the assertion of or defence against legal claims or as long as there are legal obligations to store it.

6.6. **Contact form for customised training**

6.6.1. Individual training can also be requested via a contact form.

6.6.2. The following additional information is recorded:

- First name employee
- Surname employee
- Company name
- Customer number
- Sales tax identification number
- Street
- Postcode
- City
- Contact for queries
- Telephone number
- email address

6.6.3. The legal basis for the processing in this case is Art. 6 para. 1, sentence 1, lit. b GDPR.

6.6.4. Your enquiry will be processed in Microsoft Forms within the European Union.

6.6.5. Your enquiry will be deleted after processing has been completed, but after 6 months at the latest.

7. Recipients: Processors and other controllers

7.1. As described above in this data protection information, we sometimes work together with other companies in order to be able to use or offer certain functions and services. These are either processors with whom we have concluded a data processing agreement within the meaning of Art. 28 GDPR, or other controllers such as other Webasto Group companies.

7.2. If we disclose your personal data to other controllers who process the personal data not on our instructions but for their own purposes, this will only be done for specific purposes. The transfer of your personal data to these other controllers for these purposes is carried out for the fulfilment of the contract, Art. 6 para. 1, sentence 1, lit. b) GDPR or on the basis of our legitimate interest (Art. 6 para. 1, sentence 1, lit. f) GDPR) to make our operations efficient.

7.3. Otherwise, we only transfer your personal data to other data controllers if and insofar as this is required by law in order to enforce legal claims or to investigate or prevent suspected or actual unlawful circumstances. In these cases, we will inform you separately about the respective transfer if and insofar as this is legally required.

7.4. If we transfer your personal data to processors or other controllers in countries outside the European Economic Area (EEA) (e.g. in the USA), we implement the legally required standards and security mechanisms.

8. Your rights

8.1. **Right to information:** As we only collect data from and about you to the extent described above, we only have information about you from the use of our website

if you have contacted us and provided us with the relevant information. You can assert your right to information in writing or by e-mail to us (see legal notice).

- 8.2. **Right to revoke the declaration of consent under data protection law:** If the processing of your data is based on your consent, you have the right to revoke this consent at any time in accordance with Art. 7 para. 3 GDPR. The revocation does not affect the legality of the processing carried out up to that point. You can declare your cancellation in writing or by e-mail.
- 8.3. **Right to rectification:** If your personal data is incorrect, you have the right to request its rectification (Art. 16 GDPR).
- 8.4. **Right to restriction of processing:** Under the conditions of Art. 18 GDPR, you have the right to request that the processing of data concerning you be restricted.
- 8.5. **Right to erasure:** Under the conditions set out in Art. 17 GDPR, you have the right to request the erasure of personal data concerning you. This is the case, for example, if you withdraw your consent or if the data is no longer required for the purposes for which it was collected.
- 8.6. **Right to lodge a complaint:** If you are of the opinion that the processing of your personal data violates data protection regulations, you have the option of contacting us as well as lodging a complaint with the supervisory authority responsible for us:
Bayerisches Landesamt für Datenschutzaufsicht
Promenade 18, 91522 Ansbach
Phone: +49 (0) 981 180093-0
Fax: +49 (0) 981 180093-800
E-mail: poststelle@lda.bayern.de
- The supervisory authority with which the complaint has been lodged shall inform the complainant of the status and outcome of the complaint, including the possibility of a judicial remedy pursuant to Art. 78 GDPR.
- 8.7. **Right of objection:**

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on point (e) or (f) of Article 6(1) GDPR, including profiling based on those provisions. We will no longer process the personal data concerning you unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves the establishment, exercise or defence of legal claims.

If your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing.

If you object to processing for direct marketing purposes, the personal data concerning you will no longer be processed for these purposes.

Our privacy policy may change from time to time. This also includes further developments due to changes in our business as well as adjustments due to changes in the legal situation and/or due to the implementation of new technologies or services on the website. We will publish any corresponding updates to the privacy policy on this page.

If you have any further questions that our privacy policy could not answer, please send an e-mail to the following address dataprotection@webasto.com

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