Privacy Policy for Help Center

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1 General

- 1.1 The following provisions determine how Vorwerk International & Co. KmG, Verenastrasse 39, CH- 8832 Wollerau, Switzerland ("Vorwerk International") handles your personal data with regard to our Help Centre Platform ("Help Centre") and what data is processed in case you have any specific requests concerning one of Vorwerk products or services.
- 1.2 Vorwerk International is the provider of the Help Centre and thus is the data controller with regards to data collected through the Platform as described in section 2 below. Vorwerk International is also responsible for the customer care of the Cookidoo® web platform ("Cookidoo") and Official Thermomix® Cookidoo® App" and Kobold Robot App (collectively "App").
- 1.3 Notwithstanding sec. 1.2, the sale of Vorwerk products (e.g. Kobold, Thermomix or Temial) and the customer care usually applies to other Vorwerk Group companies. The respective competence usually refers to either the customer's place of residence or the place of retail purchase. An overview of the competent Local Vorwerk Entities and their sovereign privacy policies can be found <u>here</u>.
- **1.4** For the avoidance of doubt, the Vorwerk Group Companies do not act as joint controllers, unless explicitly stated otherwise. Unless explicitly described differently in the following, each transfer of data between the Vorwerk Group Companies is a transfer from controller

to controller and not a processing of one Vorwerk Group Company on behalf of the other one.

2 Processing of personal Data on our Platform

Detailed information about the handling of your data is provided in the following of this Privacy Policy. If you have any questions or comments, please contact the data protection officer via the contact information provided in section 8 below.

2.1 Use of the Help Center Platform

When the Platform is accessed, for technical reasons, the following data will automatically be transmitted to Vorwerk International:

- IP address
- Date and time
- Quantity of data transmitted
- Accessing device and browser
- Operating system running on the accessing device
- A notification of whether access was successful

The foregoing data will be processed to technically enable you to use the Platform. Additionally, the data may be evaluated for statistical purposes and to improve the service offered in an anonymous form. Such data is processed on the legal basis of our legitimate interests (Art. 6 (1) f GDPR).

2.2 Filing a customer request

On the Platform, you have an option to use the request form in order to file a specific request to the customer service support. In this case, the following personal data is collected for the purpose of addressing your request and being able to contact you by the competent customer service support team (data marked with* are optional and depend on type of request you are filing:

- First Name
- Last Name
- Postal Code and Place of Residence
- Telephone number
- E-mail Address
- Invoice number/ voucher number*

- Order number*
- Customer's product name*

The foregoing data will be used only in order to fulfil the specific customer care request and not further processed for any other purposes. The foregoing data is processed on the legal basis of the customer's consent (Art. 6 (1) a GDPR).

2.3 Local customer care

If the customer's request concerns a Vorwerk product or service with another customer care competence within the Vorwerk Group (see sec. 1.2 and 1.3), we will share the data collected through the contact form with the respective Local Vorwerk Entity to meet the customer's request. In such cases the personal data as mentioned in sec. 2.2 will be forwarded to the competent Local Vorwerk Entity and processed for this purpose.

The foregoing data is processed on the legal basis of the customer's consent (Art. 6 (1) a GDPR).

3 Recipients of Personal Data

- **3.1** When providing support to you in addressing your requests, we may share personal data with persons acting on our behalf or otherwise involved in the customer support, including:
 - Service providers that collect data on our behalf
 - Other business partners who provide services to us, such as
 - o IT hosting providers
 - Communication service providers
- **3.2** The recipients of personal listed above may be located outside of the European Economic Area. Where necessary and unless the country to which data is being transferred has been determined by the European Commission as a country with adequate level of protection, we require such recipients to comply with data protection measures such as

standard contractual clauses, the offer of appropriate guarantees according to the guidelines of the European Commission or a E.U.-US or Swiss-U.S. Privacy Shield certification.

4 Your Rights

4.1 Right of Access (Art. 15 GDPR)

You have the right to request confirmation as to whether Vorwerk International processes your personal data and where that is the case, that Vorwerk International provides you with access to, and information on the data stored by Vorwerk International with regard to your person or your pseudonym.

4.2 Right to Rectification (Art. 16 GDPR)

You have a right in respect of the correction of data in case your personal data collected is inaccurate.

4.3 Right to Erasure (Art 17 GDPR)

You have the right to request erasure of personal data without undue delay under certain circumstances. Such circumstances may be e.g. if your personal data is no longer necessary for the purposes for which it was collected or if you withdraw consent on which our processing is based according to Art. 6 (1) a GDPR and where there is no other legal ground for processing.

4.4 Right to Restriction on Processing (Art. 18 GDPR)

You have the right to obtain a restriction of processing under certain circumstances. Such circumstance may be e.g. when you think that your personal data is not accurate or if we do not need the personal data for the original purpose of the processing but you need us to keep such data for the establishment, exercise or defence of legal claims.

4.5 Right to Data Portability (Art. 20 GDPR)

Under certain circumstances, you have the right to receive your personal data you have provided us with, in a structured, commonly used and machine-readable format and you have the right to transmit that information to another controller without hindrance or ask us to do so.

4.6 Right to Objection to Processing (Art. 21 GDPR)

Where the legal justification for our processing of your personal data is our legitimate interest according to Art. 6 (1) f GDPR, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate reasons for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defence of a legal claim.

However, we will abide by your request in any case, if the use of your personal data is for marketing purposes.

4.7 Right to Withdraw Consent

Where we process your personal data on the basis of consent you gave us within the meaning of Art. 6 (1) a GDPR, you have a right to withdraw that consent at any time. Please note that withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

4.8 How to Exercise Your Data Protection Rights

For questions about the collection, processing or use of your personal data, the disclosure, correction, blocking or deletion of data or objection to a particular processing of data, data portability please contact the data protection officer via the contact information provided below in section 8.

You have the right to give us instructions on how to handle personal data about you after your death.

4.9 Right to lodge a complaint

- 4.9.1 You have the right to lodge a complaint with a supervisory authority, in particular in the member state of your habitual residence.
- 4.9.2 If you are not satisfied with any aspect of data processing of your personal data by Vorwerk International, we would like to understand and discuss it with you and learn how can we improve the situation. Please feel free to contact us through the contact information provided below in section 8. Nonetheless, you may submit a complaint to the local data protection supervisory authority.

5 Data Security

At Vorwerk International we have implemented appropriate technical and organisational measures to prevent accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

6 Retention and Deletion of Data by Vorwerk International

- **6.1** We store your personal data relating to the provision of customer service support as long as necessary to provide the support to you, to comply with applicable laws (including those regarding document retention), to resolve disputes with any parties and otherwise as necessary to allow us to conduct our business. As a consequence, we delete personal data as soon as it is no longer necessary for the aforementioned purposes.
- 6.2 In case the processing is based on consent and you withdraw your consent, we will delete or anonymize your personal data without undue delay after the withdrawal, unless there is a legal basis to retain the data.
- **6.3** If we store personal data for the only purpose of compliance with laws on document retention, we will store this personal data in archive mode. This means that the access to this personal data is strictly limited to those persons who might need access in order to comply with the aforementioned laws.
- **6.4** The criteria we use to determine the periods for retaining your personal data include the retention requirements under applicable laws, regulations and our operational requirements, such as account maintenance, enabling customer relationship management and responding to legal claims, complaints and regulatory and law enforcement requests. If you have a question about a specific retention period for certain types of personal data we process, please contact us through the contact information provided below in section 8.

7 Status of the Privacy Policy

This Privacy Policy was updated in September 2019. We reserve the right to amend the notice from time to time in case there are any changes to data processing. In case the Privacy Policy has been updated, we will take steps to inform you of the update by appropriate means, such as through a notification shown when logging on to your account or other means in case they are more suitable (e.g. email).

8 Data Protection Officer

You may contact the data protection officer of Vorwerk International at

Vorwerk International & Co. KmG Verenastrasse 39 CH-8832 Wollerau Switzerland dpo@vorwerk.ch