



Information sheet Web application STILL Smart Portal (ROPA)

Art. 30 GDPR	Processing Register of 18.06.2026, Vers. 03
1) Role (Controller/Processor)	STILL GmbH, Berzeliusstraße 10, 22113 Hamburg, is responsible for the provision of the Client Portal within the meaning of the GDPR. Where an AI-based assistance function (e.g. GenAI-based queries or analysis functions) is used within the STILL Smart Portal, STILL processes user inputs (prompts) and the resulting outputs exclusively for the proper provision of the respective functionalities within the individual modules. AI functionalities for the analysis of module, operational, fleet or usage data are generally provided within the framework of processing on behalf of the respective customer. The customer decides on the use, scope and purposes of the functionalities within the subscribed modules and is responsible for informing the data subjects as well as for determining the applicable legal basis. STILL GmbH acts as controller within the meaning of the GDPR with regard to the provision, operation, security, further development and support of the STILL Smart Portal, to the extent that STILL determines the purposes and means of the processing. To the extent that STILL processes personal data on behalf of a customer within the subscribed modules, in particular module, operational, fleet or usage data, the processing is carried out as processor on the basis of a data processing agreement with the respective customer. Prompt data and AI interaction data are used for product, service or quality improvement purposes only to the extent that they have previously been anonymised or, where full anonymisation is not possible, at least pseudonymised and reduced to what is necessary. Customer- and user-identifying information is removed, masked or replaced to the extent possible. Pseudonymised data continues to be treated as personal data. The underlying AI models are not trained or fine-tuned with personal data. Inputs and outputs from the AI functionality are not used to improve general AI models, to the extent this is technically and contractually excluded.
2) Name of the process	STILL Smart Portal with AI functionalities

3) Description of the process and purpose of data processing	- Provision of a web application for the purpose of displaying and analyzing the STILL Smart Portal modules - Communication and contact (e.g. via email) - Anonymization of the data mentioned under 4. for statistical purposes - Provision of an AI-based assistance function within the STILL Smart Portal for use across all modules - Automated analysis of operational, fleet, and other module-related data using AI functionalities, in particular to support: - o Data evaluations - o Error and root-cause analyses - o Decision support and system usage
4) Personal data	Technical data: - IP address - Identification data - Access logs - Device data - Browser data (e.g. type and language) - Referrer URL - Operating system (OS) - Date and time of access (First Seen, Last Seen) - Accessed HTML elements - Display resolution - Domain hostname Contact details: - First and Last Name - E-mail address AI functions - Interaction data from the use of AI-functions (e.g. natural language prompts, chat-messages, AI responses, user feedback) - Technical metadata of AI-interactions (e.g. User-ID, Session ID, timestamp, device or system information) Cookies and preferences
5) Data categories/data subjects	- Users of the platform - Drivers of industrial trucks
6) Purpose of data processing	Technical data: Provision of a web application for the display and analysis of the STILL Smart Portal modules. Specifically: - Ensuring a smooth connection to the website - Evaluation of system security and stability

	- Ensuring access management and access control and documentation - Display of content in the correct language and presentation - Optimizing content for different browser types - Providing functionality software help - Improvement of the website and user navigation Contact details: - Answering questions and providing technical support Cookies and tracking: - Optimization of the website - Usability and optimization of the platform to improve the user experience - Improved navigation - User-centric marketing and sales interactions Provision of an AI: - AI-supported assistance and analysis function within the Smart Portal to support users in evaluating, for example, fleet -and operational data, as well as in system usage. - The AI functionalities are not intended to perform automated performance or behaviour monitoring of individual drivers, and especially not to make solely automated decisions that produce legal effects or similarly significantly affect individuals within the meaning of Art. 22 GDPR.
7) Possible legal basis	Possible legal basis could be e.g.: - Consent (AI usage for promotion, analytics, tracking, cookies, e.g. Userpilot) - Performance of a contract with the data subject - Employment contract (activity-relevant data processing) - Fulfillment of a legal obligation under national or EU law - Work agreements - Legitimate interests of the controller/third parties (improvement of user experience, information provision, IT security, log files)
8) Statement of legitimate interest	Processing of technical data: Ensuring the purposes listed under section 6. AI-based analysis and assistance functions enable more efficient evaluation of module data (e.g. fleet and operational data), faster detection of anomalies, and support for decision-making processes. This improves both user experience and the quality and precision of the information provided. The legitimate interests of data subjects are safeguarded by ensuring that interaction data resulting from the use of AI functions is analysed exclusively in anonymised or pseudonymised form for quality, security, and stability purposes. In



	particular, this enables early detection of malfunctions and the secure further development of the systems.
9) Service provider	KION Information Management Services GmbH Thea-Rasche-Straße 8, 60549 Frankfurt am Main, Germany Microsoft Ireland Operations Limited One Microsoft Place, South County Business Park Leopardstown , Dublin 18, D18 P521, Ireland lead on GmbH Palais am Kanal, Am Kanal 16-18 12267 Potsdam, Germany Userpilot , Inc 1887 Whitney Mesa Dr #9995 Henderson, NV 89014 Inc. 1401 Lavaca Street #7019 Austin, Texas 78701, United States MapTiler AG Zugerstrasse 22 6314 Unterägeri Zug, Switzerland MongoDB Ltd. Building 2, Number One, Ballsbridge, Shelbourne Rd, Ballsbridge, Dublin D04 Y3X9, Ireland Datadog Inc. 620 8th Ave 45th Floor New York, NY 10018, USA Papoo Software & Media GmbH Auguststraße 4 53229 Bonn, Germany tech@spree GmbH Bülowsstraße 66 10783 Berlin Google Cloud Platform, Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland

10) Which recipients have access to the data?	The following categories of recipients receive access to personal data:		
	Role	Access to	Reason
	STILL	Technical data and, where applicable, pseudonymised AI interaction data	Provision of the service
	Customer/User	Content of the platform	Use of the booked service
	KION Information Management Services GmbH	Technical data and operating -and log data of the AI function	Technical support
	MongoDB	Content of the platform	Database provider
	Microsoft	Content of the platform	Host provider
	Userpilot	User activity data	(If consent is given): Improving the user experience
	Datadog	IP address and log data	Central logging and data analysis solution
	CCM 19 Papo Software & Media GmbH	IP address	Cookie Management Tool
	MapTiler	IP address	Provision of map function
	tech@spree GmbH	Pseudonymised data	Support and maintenance of a communication server
lead on GmbH	Ship-to information and customer user account	Fleet Insights onboarding and support	
Google	Content data (might include personal data)	Provision of AI Large Language Model infrastructure and hosting.	
11) Data transfer outside the EU	Transfers to third countries may occur in particular where service providers or their subprocessors are used that are established		



	outside the EU/EEA or have access possibilities from outside the EU/EEA. For Userpilot and Datadog, reliance is placed on their certification under the EU-U.S. Data Privacy Framework, to the extent that the relevant processing is covered by the scope of the certification. Otherwise, transfers to third countries are carried out on the basis of appropriate safeguards, in particular EU Standard Contractual Clauses, adequacy decisions, transfer impact assessments and supplementary measures, where required.
12) Hosting Location	Hosting and data storage of the application is done in Microsoft Azure in Region Europe-West with data center in the Netherlands Userpilot: Hosting AWS EU Paris, France Datadog: Usage of Site EU1 with hosting in Germany
13) Storage period	Technical data: 30 days, unless longer retention is required for error analysis, IT security or the establishment, exercise or defense of legal claims. User profile: For the duration of active use or the customer's contractual term; thereafter deletion or deactivation in accordance with the customer's instructions or the contractual deletion periods, unless statutory retention obligations prevent deletion. Where optional functionalities are based on consent, until withdrawal of consent. Cookies and preferences: In accordance with the retention periods stored in the Consent Management Tool; non-essential cookies/tracking data are retained until withdrawal of consent or until expiry of the respective cookie/storage period. Contact data: Until the request has been resolved, unless statutory retention, documentation or evidentiary obligations prevent deletion. Statutory retention obligations: Where statutory retention obligations or documentation, evidentiary or defense obligations apply, data will be retained for the respective period required by law or contract. AI interaction data, e.g. prompts and AI responses: - AI interaction data generated within a chat thread, i.e. a complete conversation between the user and the AI assistant, are stored in the system for as long as the thread is actively maintained by the user, but no longer than for the duration of the active user account or the customer's contractual term, unless earlier deletion is initiated by the user or the customer. - Users can delete chat threads at any time via the portal interface. Once a thread is deleted by the user, the associated



	interaction data are permanently removed from the primary application database (hard delete). - For reasons of operational security, logging and system stability, technical event data and metadata relating to AI interactions may remain in system logs for up to 30 days after deletion. These logs are used exclusively for troubleshooting, security monitoring and ensuring service reliability. To the extent possible, system logs do not contain complete prompt or response content.
14) Conducting IT security audits	☒ Yes, see Appendix 2 ☐ No