



STILL Smart Portal

Privacy Policy

Welcome to our STILL Smart Portal!

Below we would like to inform you about how we process your personal data in connection with the use of this portal.

1. The person responsible (controller) of the STILL Smart Portal is:

STILL GmbH

Berzeliusstraße 10 , 22113 Hamburg

Email address: support@still.eu

2. Collection and storage of personal data as well as the type and purpose of processing and the legal basis

a) Technical data

When you access our portal, the following technical data is processed:

- 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

This data is processed for the following purposes:

- Ensuring a smooth connection to the website
- Evaluation of system security and stability
- Ensuring access management, 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

The legal basis for data processing is Art. 6 (1) (f) GDPR. Our legitimate interest is to ensure the purposes listed above.

b) Contact via link to email communication:



If you have any questions, we offer you the opportunity to contact us via a link provided on the portal. You must provide a valid email address so that we know who sent the inquiry and can respond to it. The following contact data is processed: first and last name, email address. You may also provide additional personal information voluntarily.

Data processing for the purpose of contacting us is carried out in accordance with Art. 6 (1) (a) GDPR on the basis of your voluntarily given consent.

c) Cookies

Please note that we use technically necessary functional cookies on this site, which are essential for the proper functioning of STILL Smart Portal. We also use cookies that improve the user experience, facilitate navigation, and adapt to user needs. This is done by analyzing user behavior. In particular, this data can also be used to improve the use of STILL Smart Portal and customize its functionality according to the user's individual interests. Furthermore, with your consent, this data can be used for marketing and sales interactions.

Depending on the type of cookie, processing is based on the legitimate interest described in accordance with Art. 6 (1) (f) GDPR (for technically necessary functional cookies) or your consent in accordance with Art. 6 (1) (a) GDPR (for all other cookies). In certain cases, we may also be under a legal obligation to store personal data regarding cookies, in which case the legal basis is Art. 6 (1) (c) GDPR. You can set your browser so that you are informed about the setting of cookies and decide individually whether to accept them or to exclude the acceptance of cookies for certain cases or in general. If you do not accept functional cookies, certain functionalities of STILL Smart Portal may be restricted.

Here is an overview of cookies:

Name	Description
Userpilot	Userpilot is a tool for improving user experience and interaction on the portal. Userpilot is provided by Userpilot, Inc., 1401 Lavaca Street, #7019 Austin, Texas 78701, USA. It offers features such as session recording, product analytics, user onboarding, and in-app surveys. This helps to better understand user behavior and make targeted improvements. User onboarding can support new users with interactive instructions and tips. In-app surveys allow for direct user feedback and increase user satisfaction. The legal basis for this is Art. 6 (1) (a) GDPR.
Cookie Consent Manager CCM 19	Cookie management tool for compliance with legal requirements. Our platform uses cookie consent technology from CCM19 – Cookie Consent Management to legally obtain your consent to the storage of certain cookies in your browser and to document this consent in compliance with data protection regulations. The provider of this technology is CCM19 – Cookie Consent Management, Papoo Software & Media GmbH, Auguststr. 4, 53229 Bonn (hereinafter CCM19). CCM19 cookie consent technology is used to comply with legal requirements for obtaining consent. The legal basis for this is Art. 6 (1) (c) GDPR.
Datadog	Datadog is a tool provided by Datadog, Inc., 620 8th Ave, 45th Floor, New York, NY 10018, USA ("Datadog") and is used to optimize the user-friendliness of our portal by analyzing user behavior. The system reports, among other things, possible errors on the website (application screens, user actions, network requests, and measurement of the performance of our front-end code), ongoing bugs, and problem monitoring. Datadog transmits log data for error analysis. Standard contractual clauses have been concluded with Datadog for the case of data transfer to the USA. Further information on the collection and use of data can be found in the privacy policy of Datadog .

d) AI-based assistance functions



Within the STILL Smart Portal, we provide an AI-based assistance function that is available across all 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.

We only act 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 we determine the purposes and means of the processing. In connection with the use of these AI-based assistance functions, we process the following personal data in our capacity as a data controller:

- AI interaction data:
- Natural language prompts, chat messages, AI responses and user feedback;
- Technical metadata of AI interactions (e.g. User ID, Session ID, timestamp, device or system information);

We process this data as a controller for the following purposes:

- AI-supported assistance and analysis function within the STILL Smart Portal to support users in evaluating fleet and operational data as well as in system usage;
- Quality assurance and improvement of the AI functions on the basis of anonymized or pseudonymized interaction data;
- Ensuring operational security, stability and further development of the AI systems.

The AI functionalities are not intended to perform automated performance or behavior 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.

AI interaction data generated within a chat thread is 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. 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. For reasons of operational security and system stability, technical event data and metadata relating to AI interactions may remain in system logs for up to 30 days after deletion.

The legal basis for the processing of AI interaction data is Art. 6 (1) (f) GDPR. Our legitimate interest lies in the efficient evaluation of module data, the rapid detection of anomalies, and the support of decision-making processes, as well as in the secure further development of the systems. To the extent that the use of AI functions for analytics or promotional purposes is based on your consent, the legal basis is Art. 6 (1) (a) GDPR.

e) Anonymization for statistical purposes

The personal data listed under sections 2 (a) to (d) above may be anonymized and used for statistical analysis purposes, in particular to evaluate and improve the performance, stability and functionality of the STILL Smart Portal. Once anonymized, the data can no longer be attributed to an identified or identifiable individual and therefore falls outside the scope of the GDPR.

The legal basis for this processing is Art. 6 (1) (f) GDPR. Our legitimate interest lies in the statistical analysis of aggregated usage data to continuously improve our portal, its services and the user experience.

3. Recipients of personal data



KION Information Management Services GmbH

Technical data and, where applicable, pseudonymized AI interaction data and log data are transmitted to KION Information Management Services GmbH, Thea-Rasche-Straße 8, 60549 Frankfurt am Main, Germany, for the purpose of providing technical support for the platform.

Google Cloud Platform

For the provision of AI Large Language Model (LLM) infrastructure and hosting, content data – which may include personal data – is transmitted to Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (Google Cloud Platform).

MongoDB

Platform content data is transmitted to MongoDB Ltd., Building 2, Number One, Ballsbridge, Shelbourne Rd, Dublin D04 Y3X9, Ireland, for the purpose of database provision and operation.

MapTiler

MapTiler : Transfer of the IP address to MapTiler AG, Höfnerstrasse 98, Unterägeri, Zug 6314, Switzerland for the purpose of displaying the map material on STILL Smart Portal for the duration of the session. MapTiler hosts the IP address on servers in Germany and in the EU. The transmission of the IP address to MapTiler is based on Art. 6 (1) (f) GDPR and is stored by MapTiler for up to two months to carry out security checks (software protection). Our legitimate interest is the use of MapTiler to improve our service by providing an attractive presentation of our range of services and making the locations listed on the portal easy to find. Further information can be found at [Privacy](https://www.maptiler.com/privacy-policy/)
<https://www.maptiler.com/privacy-policy/>

tech@spree GmbH

Pseudonymized data is transmitted to tech@spree GmbH, Bülowstraße 66, 10783 Berlin, Germany for the purpose of support and maintenance of a communication server.

lead on GmbH

To onboard customers to the STILL Smart Portal and for the mapping of data, customer data is transmitted to lead on GmbH, Palais am Kanal, Am Kanal 16-18, 12267 Potsdam, Germany.

Microsoft Ireland Operations Limited

The STILL Smart Portal is hosted on Microsoft Azure infrastructure provided by Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland. Hosting and data storage are carried out in the Azure Region Europe-West with data center in the Netherlands. Microsoft receives access to platform content data as host provider.

Depending on which modules of STILL Smart Portal services are used, various processors may be recipients of personal data. The categories of recipients of personal data include, in particular:

- Hosting service provider (namely Microsoft Ireland Operations Limited and Google Ireland Limited)
- IT service providers for maintenance and support purposes (such as KION Information Management Services GmbH and MongoDB)
- External developers, application providers
- Other processors engaged to provide and improve our platform

Recipients of personal data outside the EU or the EEA will only receive personal data on the basis of EU standard data protection clauses in accordance with Art. 46 (2) (c) GDPR or the EU-US Data Privacy Framework. This applies to Userpilot



and Datadog (see above section 2 c)); still, data processed through Userpilot and Datadog are stored by both providers within the European Union.

Your personal data will not be transferred to third parties for purposes other than those listed below. We will only share your personal data with third parties if:

- You have given your express consent to do so.
- This is necessary to carry out the contractual relationship.
- There is a legal obligation.
- The transfer is necessary to assert, exercise or defend legal claims and there is no reason to assume that you have an overriding legitimate interest in not disclosing your data.

4. Rights of data subjects

You have the right, if the legal requirements are met

- **Information** about your personal data processed by us (Art. 15 GDPR),
- To request the correction of incorrect or incomplete data stored by us (Art. 16 GDPR),
- The **deletion** of your data stored by us (Art. 17 GDPR),
- To request the **restriction of the processing of your data (Art. 18 GDPR)**,
- Portability of your **data in a structured, common and machine-readable format** or to request transmission to another controller (Art. 20 GDPR),
- **To revoke** your consent at any time with effect for the future (Art. 7 (3) GDPR)
- **To object** to processing based on a legitimate interest, provided that you have reasons arising from your particular situation that do not outweigh our legitimate interests in data processing.

Please contact us at: kcid@kiongroup.com. You can also exercise your data subject rights (e.g., deletion, rectification) yourself using the "MyAccount" function.

You can also contact our Group Data Protection Officer dataprotection@kiongroup.com or complain to a supervisory authority (e.g. your usual place of residence or work or our company headquarters) (Art. 77 GDPR).

5. Data security

Within the STILL Smart Portal, we use the SSL (Secure Socket Layer) method in conjunction with the highest level of encryption supported by your browser. This is typically 256-bit encryption. If your browser does not support 256-bit encryption, we use 128-bit v3 technology instead. You can tell whether an individual page of our website is being transmitted encrypted by the closed key or lock symbol in the lower status bar of your browser.

We have also implemented appropriate technical and organizational security measures to protect your personal data against accidental or intentional manipulation, partial or complete loss, destruction, or unauthorized access by third parties. Our security measures are continuously improved in line with technological developments.

6. Storage period

We store your personal data for as long as necessary for the purposes described above for which it was collected or processed, we have a legitimate interest in continued storage, or you have not revoked the processing based on your consent. The legitimate interest is the fulfillment of legal obligations, including the defense of legal claims and the obligation to provide evidence.

The following specific retention periods apply to the respective data categories:



- 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 tracking data: In accordance with the retention periods stored in the Cookie Consent Management Tool; non-essential cookies and tracking data are retained until withdrawal of consent or until expiry of the respective cookie or storage period.
- Contact data: Until the request has been resolved, unless statutory retention, documentation or evidentiary obligations prevent deletion.
- AI interaction data (e.g. prompts and AI responses): AI interaction data generated within a chat thread are stored 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. Users can delete chat threads at any time via the portal interface. Once a thread is deleted, the associated interaction data are permanently removed from the primary application database (hard delete). For reasons of operational security and system stability, technical event data and metadata relating to AI interactions may remain in system logs for up to 30 days after deletion.

7. Group Data Protection Officer: Your contact person for data protection

If you have any questions about the processing of your personal data and/or if your rights as a data subject, please feel free to contact our Group Data Protection Officer directly.

Contact Group Data Protection Officer:

Email: dataprotection@kiongroup.com

KION GROUP AG

Thea-Rasche-Straße 8

60549 Frankfurt am Main, Germany

Phone +49 69 20 110 0

Website: www.kiongroup.com

8. Currentness and changes to this privacy policy

Due to the further development of our portal and services or due to changes in legal or regulatory requirements, it may become necessary to amend this privacy policy. You can access and print the current privacy policy at any time on the website at still-smart.com.

This privacy policy is currently valid and is dated July 1, 2026.