



## FleetManagement Information Sheet (ROPA)

Art. 30 GDPR	Processing Register of 15.05.2025, Vers. 02
<b>1. Role (Controller/Processor)</b>	<p>a) With regard to the provision of this service, including customer service and support, STILL GmbH (STILL) is a processor within the meaning of Art. 28 of the EU GDPR. The customer must ensure the legality of the processing of personal data, in particular through the use of additional data sources (personalized data processing).</p> <p>b) If STILL uses the anonymized or pseudonymized data for the purpose of benchmarking and training the AI as well as for product and service improvement, it acts as its own responsible body (Data Controller).</p>
<b>2. Name of the process</b>	Fleet management (including Still Smart Driver APP)
<b>3. Description of the process</b>	<ul style="list-style-type: none"> <li>- Management of driver master data</li> <li>- Management of vehicles with possible assignment to drivers through their access media (RFID media/PINs) in order to enable access control and, if necessary, individual restriction measures (e.g. driver-specific maximum speed) by assigning these to vehicles.</li> <li>- Storage, display and sending (e-mail) of the operational and event data generated by the vehicles for the purpose of creating evaluations and analyses of vehicle usage and response to events.</li> <li>- Analysis of anonymized data for product and service improvement.</li> </ul>
<b>4. Contact person</b>	Sebastian Wienforth, Thomas Kemmer
<b>5. Personal data</b>	<ul style="list-style-type: none"> <li>- Personal master data (e.g. name, personnel number or telephone number)</li> <li>- Planning and control data (e.g. driver assignments)</li> <li>- Access media/works ID cards and driver PINs</li> <li>- Driving license data (e.g. validity and restrictions, as well as driver qualifications and their validity periods)</li> <li>- Time data and conditions (e.g. vehicle condition) of events</li> <li>- Operating/usage data of industrial trucks (e.g. driving data)</li> </ul>
<b>6. Data categories/data subjects</b>	Employee data (external/internal)
<b>7. Purpose of data processing</b>	<p>a) Provision of the services described above</p> <p>b) Product and service improvement</p>



<b>8. Possible legal basis</b>	<p><b>Customer</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Consent</li> <li><input type="checkbox"/> Performance of a contract with the data subject</li> <li><input checked="" type="checkbox"/> Employment contract according to Section 26 BDSG</li> <li><input checked="" type="checkbox"/> Fulfillment of a legal obligation under national or EU law (e.g. occupational safety)</li> <li><input checked="" type="checkbox"/> Company agreement (if performance and behavior monitoring is possible)</li> <li><input checked="" type="checkbox"/> Legitimate interest; See 9</li> </ul> <p><b>STILL</b></p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Processing under commission according to Art. 28 GDPR (STILL as processor)</li> <li><input checked="" type="checkbox"/> Legitimate interests in the processing of pseudonymized data for product and service improvement</li> </ul>
<b>9. Statement of legitimate interest</b>	<p>a) Legitimate interest of customers:</p> <p>Optimization of fleet management, managing the vehicle fleet and ensuring access control for vehicles (drivers with a license). Improvement of work organization and workflows. Minimization of accidents through authorization control. Improved work organization and data-based process optimization lead to optimization and cost-saving opportunities.</p> <p>b) Legitimate interest STILL</p> <p>The use of anonymized or pseudonymized data for benchmarking (data-based consulting) and the training of AI models for the purpose of further developing and optimizing our products and services is based on a legitimate interest pursuant to Art. 6 (1) (f) GDPR. This legitimate interest consists in continuously improving the performance and efficiency of the products and services offered. Benchmarking allows us to create objective comparison values that help us identify weaknesses, recognize optimization potential, and provide customers with the best possible advice.</p> <p>Legitimate interest of the data subject:</p> <p>Protection of personal rights and no "surveillance pressure".</p> <p>Balancing of interests:</p> <p>STILL generally processes the data described above in anonymized or pseudonymized form, provided that a personal connection can be established through third parties (e.g., shift schedules, bookings of other STILL services). The interest in using pseudonymized data for the purposes of research, development, and product improvement, as well as to promote sustainability, outweighs the interests of the data subjects, taking into account the data categories presented here.</p>
<b>10. Service provider</b>	comnovo GmbH

	<p>Robert-Schuman-Straße 6 44263 Dortmund Germany</p> <p>KION Information Management Services GmbH Carl-Zeiss-Straße 11 85737 Ismaning Germany</p> <p>Microsoft Ireland Operations Limited One Microsoft Place, South County Business Park Leopardstown, Dublin 18 D18 P521, Ireland</p> <p>akquinet AG Paul-Stritter-Weg 5 22297 Hamburg</p> <p>lead on GmbH Palace on the Canal On Canal 16-18 12267 Potsdam</p>																								
<b>11. Which recipients have access to the data?</b>	<p>The following persons have access to the personal data:</p> <table><tr><th>role</th><th>Access to</th><th>Reason</th></tr><tr><td>STILL &amp; Sales Units</td><td>Vehicle usage data</td><td>Provision of services, customer support</td></tr><tr><td>Customer</td><td>Content of the platform</td><td>Use of the services</td></tr><tr><td>comnovo</td><td>Pseudonymized activity data</td><td>Development and security management, support</td></tr><tr><td>KION GROUP IT</td><td>Pseudonymized data</td><td>Hardware operation, analyses, support</td></tr><tr><td>Responsible branches, if authorized by customer</td><td>Pseudonymized activity data</td><td>Advice for customers, 1st.-Level Support</td></tr><tr><td>Microsoft Germany</td><td>Pseudonymized activity data</td><td>Hosting provider</td></tr><tr><td>akquinet</td><td>Content of the platform</td><td>IT services</td></tr></table>	role	Access to	Reason	STILL & Sales Units	Vehicle usage data	Provision of services, customer support	Customer	Content of the platform	Use of the services	comnovo	Pseudonymized activity data	Development and security management, support	KION GROUP IT	Pseudonymized data	Hardware operation, analyses, support	Responsible branches, if authorized by customer	Pseudonymized activity data	Advice for customers, 1st.-Level Support	Microsoft Germany	Pseudonymized activity data	Hosting provider	akquinet	Content of the platform	IT services
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	lead on	User data	Customer support
<b>12. Data transfer outside the EU</b>	<input type="checkbox"/> Yes, <input checked="" type="checkbox"/> No		
<b>13. Hosting Location</b>	Netherlands		
<b>14. Storage period</b>	No deletion will occur without a self-initiated deletion request from Fleets. Furthermore, personal data may be stored for at least three years after the contract termination for the purpose of demonstrating compliance with legal requirements. Pseudonymized or anonymized data for STILL can be stored for a maximum of 10 years for the purposes of product development and improvement.		
<b>15. Conducting IT security audits</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		