



Information sheet Energy Module Customer Portal (ROPA)

Art. 30 GDPR	Processing Register of 19. May 2025, Vers.02
1. Role (Controller/Processor)	<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>
2. Name of the process	Energy Module
3. Description of the process	<p>Smart Energy Unit: The Smart Energy Unit reduces charging peaks through intelligent charging management.</p> <p>Analytics: Analytics provides customers with detailed battery analyses and charging profiles for their fleet. It also helps determine the optimal charging time.</p> <p>Costs & CO2: This module enables cost and CO2 savings by utilizing lithium-ion technology compared to other energy sources such as fossil fuels or lead acid.</p>
4. Contact person	Gesa Kaatz
5. Personal data	<p>The following device data is processed, which may be personally identifiable when combined with other information. STILL GmbH is unable to assign the following data to individuals based on this data. The data is either anonymized for STILL GmbH or, if a personal reference is possible by adding additional data (by the customer), pseudonymized.</p> <p><u>Data collected from the connected charger come:</u></p> <ul style="list-style-type: none">- Battery ID, Charger ID and Truck ID- Charging power- State of Charge- Last seen Battery- Time stamp charging <p><u>Data coming from Smart Portal (set by the customer):</u></p> <ul style="list-style-type: none">- Charging limits



	<ul style="list-style-type: none"> - Time-dependent limits (time range, days of the week, limit amount) - Charger Priority - SoC Priority - KEU name - Charger Name - KEU fleet allocation
6. Data categories/ data subjects	Employee data (external/internal)
7. Purpose of data processing	a) Provision of the services described above b) Product and service improvement
8. Possible legal basis STILL and customers	<p>Customer</p> <p><input type="checkbox"/> Consent</p> <p><input type="checkbox"/> Performance of a contract with the data subject</p> <p><input checked="" type="checkbox"/> Employment contract according to Section 26 BDSG</p> <p><input type="checkbox"/> Fulfillment of a legal obligation under national or EU law (e.g. occupational safety)</p> <p><input checked="" type="checkbox"/> Company agreement (if performance and behavior monitoring is possible)</p> <p><input checked="" type="checkbox"/> Legitimate interests: Optimization of the fleet from an energy and sustainability perspective</p> <p><u>STILL</u></p> <p><input checked="" type="checkbox"/> Processing under comission according to Art. 28 GDPR (STILL as processor)</p> <p><input checked="" type="checkbox"/> Legitimate interests in the processing of pseudonymized data for product and service improvement</p>
9. Statement of legitimate interest	<p><u>a) Legitimate interest of customers:</u></p> <p>Optimization of charging management and transparency regarding cost and CO2 savings through the use of lithium-ion technology. This can lead to improved work organization and workflows, which is primarily in the interest of the company's employees. Improved work organization and improved workflows indirectly lead to optimization and cost-saving opportunities for the company.</p> <p><u>b) Legitimate interest STILL</u></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><u>Legitimate interest of the data subject:</u></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> <p>Note: In some jurisdictions, the use of the solution may need to be coordinated with the relevant works council. It is recommended to do this through a corresponding agreement with the works council (e.g., agreement on the purpose of use) to minimize or limit potential impacts on affected individuals and any resulting data protection risks.</p>															
10. STILL service providers	<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>comnovo GmbH Robert-Schuman-Straße 6 44263 Dortmund Germany</p> <p>lead on GmbH Palace on the Canal On Canal 16-18 12267 Potsdam</p>															
11. Which recipients receive access to personal data?	<p>The following entities will have access to the personal data:</p> <table><tr><th>Role</th><th>Access to</th><th>Reason</th></tr><tr><td>STILL</td><td>Pseudonymized data (vehicle data) if applicable</td><td>Provision of the service, Customer support</td></tr><tr><td>Customer</td><td>Content of the platform</td><td>Use of the services</td></tr><tr><td>KION GROUP IT</td><td>Pseudonymized data</td><td>Hardware operation, analysis, support</td></tr><tr><td>Responsible branches, if authorized by customer</td><td>Pseudonymized activity data</td><td>Advice and support for customers, 1st. - Level support</td></tr></table>	Role	Access to	Reason	STILL	Pseudonymized data (vehicle data) if applicable	Provision of the service, Customer support	Customer	Content of the platform	Use of the services	KION GROUP IT	Pseudonymized data	Hardware operation, analysis, support	Responsible branches, if authorized by customer	Pseudonymized activity data	Advice and support for customers, 1st. - Level support
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	comnovo	Pseudonymized activity data	Development and security management, support	
	Microsoft Germany	Pseudonymized activity data	Hosting provider	
	lead on	User data	Customer support	
12. Data transfer outside the EU	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
13. Hosting Location	Netherlands			
14. Storage period	According to the agreement with the customer, at least 3 years after termination of the contract			
15. Conducting IT security audits	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No			