

DataAct – Mandatory information in accordance with the EU Data Regulation on LACOS networked products LC:TRACKER, LC:ONE, and the associated services LC:FleetNav and LC:FleetNav-mobile

By using the connected LACOS services with the networked LACOS products, data is generated which users can access and use themselves or make available to third parties in accordance with legal regulations, in particular the EU Data Protection Regulation.

Selected legal definitions

A **connected product** is an item that obtains, generates, or collects data about its use or environment and can transmit product data via an electronic communication service, a physical connection, or device-internal access (e.g., a connected generator), and whose primary function is not to store, process, or transmit data on behalf of any party other than the user.

Product data is data generated by the use of a connected product and designed by the manufacturer to be accessible via an electronic communication service, a physical connection, or device-internal access by a user, data owner, or third party—including, where applicable, the manufacturer.

Connected service refers to a digital service that is not an electronic communications service, – including software – that is connected to the product at the time of purchase, rental, or lease in such a way that the connected product would not be able to perform one or more of its functions without it, or that is subsequently connected to the product by the manufacturer or a third party in order to supplement, update, or customize the functions of the connected product. A bidirectional data exchange takes place between the connected service and the linked product. A typical example of a connected service is an app that is connected to the product.

Connected service data is data that represents the digitization of user actions or processes in connection with the connected product and is intentionally recorded by the user or generated as a by-product of the user's actions during the provision of a connected service by the provider. Users are natural or legal persons who own a connected product or who have been contractually granted temporary rights to use the connected product or who use the connected services.

The data owner is a natural or legal person who has the right or obligation to use and make available data, including, where contractually agreed, product data or related service data that they have accessed or generated in the course of providing a related service.

With regard to the terms used, we also refer to the definitions in Article 2 of the EU Data Protection Regulation.

In accordance with Art. 3 (2-3) of the EU Data Protection Regulation, we provide users with the following information:

1. Connected LACOS products LC:TRACKER, LC:ONE

1.1 Type, estimated scope, and frequency of product data

LC:TRACKER (product family)

The LC:TRACKER-active standard units record GPS-based location data and changes in orientation $>15^\circ$ and send this data continuously via an integrated mobile connection as a json file at 30-second intervals with a time stamp and identifier to LACOS servers.

Permanently installed LC:TRACKER-active standard units only transmit data in the event of vibrations or ignition signals. Once the data has been successfully uploaded, it is deleted from the units.

The LC:TRACKER-passive standard and LC:TRACKER-passive person units enable the detection of connected attachments or operators. If these are connected to the LC:TRACKER-active via BLE, their MAC addresses (identifiers) are transmitted to our telematics services.

The amount of product data generated, approximately 1MB-10/month, depends on the use of the connected product.

This data is available to the user in the connected services.

LC:ONE

LC:ONE records GPS-based location data as well as additional location-related information stored by users, e.g., field name, field number, obstacle markings, created tracks, changes in alignment $>15^\circ$, and machine geometries. In addition, operating data can be collected via ISO bus-connected attachments, if stored by the user (e.g., information on the amount of fertilizer sprayed).

This data is continuously transmitted to LACOS servers as a JSON file at 30-second intervals via a Wi-Fi-connected mobile connection, where it is available to the user.

The volume of product data generated, approx. 5MB-500/month, depends on the use of the connected product.

1.2 Access/storage/retention of product data

The data generated by the networked LACOS products is stored on the server in accordance with the order processing agreement and our customers' instructions, but for a maximum of three years in each case, unless otherwise agreed.

Users can manually delete product data on the LC:ONE device or export it as an ISOXML file. Users can access additional information via the LACOS services that may be connected. Third-party requests for access require separate approval from our customers. However, access is free of charge.

2. The LACOS services LC:FLEETNAV, LC:FLEETNAV-mobile, LC:FLEETNAV-mobile person

2.1 Type and estimated scope of related services

When providing our related services, user data (account/registration data) and device data (user ID, device ID), usage and diagnostic data, communication and notification data are collected and processed.

In addition, all data from networked products is available for the provision of individual functions (lane planning, geolocation of agricultural machinery, logbook, geofencing, evaluation of various operating data, activation/deactivation of agricultural machinery functions).

Users can enrich this data by adding maintenance data and geofencing data (each including stored contact details for notification purposes), lanes (geodata), machine data, and attachment data (each including assigned LC:TRACKER IDs).

Estimated volume of connected service data generated per usage intensity approx. 10-500 MB/month.

2.2 Access/storage/retention of product and related service data

Access is provided via the LACOS services to which the user has subscribed.

An export must be requested separately and can be done as a CSV file. Continuous access to the service data is not currently planned.

The user may agree with a third party that the latter may request product data and related service data directly from LACOS on behalf of the user.

To do so, the third party must contact LACOS, submit a request for data transfer, and refer to the relevant user data. Third-party access to user data must be covered by the user's consent or by a legal basis in accordance with the GDPR. Appropriate evidence must be provided.

The data is stored by LACOS and selected service providers (e.g., the hosting provider Hetzner Online GmbH) for between 10 days and 3 years, depending on the required log level.

In support cases, remote access to LC:ONE can be provided by the service provider DWSNET s.r.l. after approval by the customer.

The data will be deleted by LACOS upon request.

3. Own use & disclosure to third parties

We do not currently use readily available data for our own purposes, nor do we pass it on to third parties without appropriate instructions or legal obligations. In the future, however, we intend to use data to improve our functions and services, develop new products or services – including artificial intelligence (AI) solutions from LACOS or service providers acting on behalf of LACOS, possibly also in cooperation with other partners – and to aggregate this data with other information or create derived data in order to use it for any lawful purpose. This may also include selling or otherwise providing such aggregated or derived data to third parties. Processing is carried out exclusively on the basis of a valid legal basis in accordance with the GDPR or within the framework of the current LACOS General Terms and Conditions that we have agreed with the user.

4. Address of data owner

LACOS GmbH
Industriestraße 9
07937 Zeulenroda-Triebes
Germany
info@lacos.eu

LACOS is a potential holder of trade secrets contained in the data accessible via the networked product or generated during the provision of a related service.

5. Right of appeal

As a user, you have the right to lodge a complaint with the competent authority of the EU Member State in which you have your habitual residence or place of work if you believe that your rights under the EU Data Protection Regulation have been violated (Art. 38 Data Protection Regulation).

6. Contract term & termination

Data processing by LACOS is subject to the term of the subscription and the applicable terms and conditions. Information on unsubscribing/terminating the subscription is described in the LACOS terms and conditions.

7. Changes to this information on related service data

New legal requirements, corporate decisions, or technical developments may lead to changes in this information on networked products and related service data, and may require us to update this document with information on related service data. The current version can be found on our website. Please note that external links to third-party websites or their contact information may change over time. If you find any information that is no longer up to date, please let us know.