



Mandatory information in accordance with the EU Data Regulation on networked products and associated services RSP-Connect

When you use our RSP Connect together with your networked RSP Suction Excavator, data is generated which you can access and manage in accordance with legal requirements, in particular the EU Data Regulation.

In this information on connected service data, we inform you, in your capacity as a user in accordance with the EU Data Regulation (see definition below) about the type of data your connected RSP Suction Excavator generates as part of the connected service RSP-Connect, the potential data volume, how this data is stored and shared, how you can access and manage this data, and what rights you have with regard to the data.

For information on any connected products and connected services offered by the vehicle manufacturer, please refer to .

Selected legal definitions

A **connected product** is an object 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 main function is not to store, process or transmit data on behalf of another party – except 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 communications service, a physical connection or device-internal access by a user, data owner or third party, including the manufacturer where applicable.

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 adapt the functions of the connected product. There is a bidirectional exchange of data 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 digitisation of user actions or processes in connection with the networked 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.



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 connected service.

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

In accordance with Article 3(2)-(3) of the Data Regulation, we provide users with the following information.

1. The nature, estimated scope and frequency of the collection of product data that the potential data owner is likely to receive and, where applicable, the modalities by which the user can access or retrieve this data, including the modalities of the future data owner with regard to the storage and duration of data retention:

When you use your connected vehicle, it collects certain product data for technical and contractual reasons and continuously transmits it to our server. This data includes the following:

a) Type of data: Rotational speeds, pressures, functions and their service life, signal strengths of the radio module, GPS coordinates, control data such as activated or deactivated functions of the RSP superstructures, error codes.

b) Estimated volume: The product data that the product can generate depends on how often and how long it is used. On average and depending on usage, between 1 MB/week and 10 MB/week are generated and transmitted to RSP servers as JSON data records.

c) How you can access and retrieve such product data: see below 2.

d) Storage and retention period:

i) The product data is stored on the server in accordance with the order processing agreement and instructions from our customers, but for a maximum of the duration of the agreement, unless otherwise agreed.

ii) On the device: The vehicle stores data on the device. The maximum storage capacity is 25 MB. Older data is overwritten.

2. The nature and estimated scope of the related service data to be generated, as well as the modalities by which the user can access or retrieve this data, including the modalities of the future data owner with regard to the storage and duration of data retention, as well as information on how the user can request that the data be transferred to a third party and how they can terminate the data transfer, if applicable.



- a) Type of data:** Vehicle information (e.g. vehicle identification number (VIN), vehicle model, vehicle ID), product data of RSP superstructures (e.g. speeds, pressures, functions), location information based on GPS data (e.g. driving and average speed, distance travelled, locations and parking duration), control data (e.g. activated or deactivated functions of RSP superstructures, error codes), user data (e.g. name and email address of the user account in RSP Connect) and usage data (e.g. terminal device data, time and retrieval of resources)
- b) Estimated volume of connected service data generated:** The estimated volume is between 2MB per day and 50MB per week, depending on how actively the app is used.
- c) Data storage regulations and retention period:** The connected service data is stored on the server in accordance with the data processing agreement and instructions from our customers, but for a maximum of 4 years in each case, unless otherwise agreed.

d) How users can access product data and connected service data:

If you are a user,

- i. you can access the product data and connected service data via the RSP Connect web application. To do this, you must open the "Manage vehicle" menu and select "Download vehicle data".
- ii. You must then select which data you want to download and from which period, and click on Download.

The data is provided as a CSV download.

e) How users can access additional connected service data

If you are a user, additional connected service data (user data and usage data), including account information and subscription status information, is generated, which can only be accessed if you request it from rsp-connect@rsp-germany.com.

- iii. You can send an email to torsp-connect@rsp-germany.com requesting the provision of the connected service data, stating your user email address and the period for which you are requesting this data.
- iv. A file containing the relevant data will then be created and shared with you.

f) How to request that data be disclosed to third parties:

- i. The user can agree with a third party that the third party will request product data and associated service data directly from RSP on behalf of the user.
- ii. The third party can then submit a request for data transfer by email to torsp-connect@rsp-germany.com, referring to the relevant VIN.



- iii. RSP will notify the user that a third party has submitted a request for data transfer and that the user must approve this request. Note: If you are not the owner of the vehicle, you must contact the owner, as only those registered as the owner of the vehicle in the app will receive the notification. If you are registered as the owner of the vehicle and there are multiple users (e.g. in fleet scenarios), please ensure that you only request access to data that is not related to other users, or ensure that access to other users' data is covered by their consent or other legal basis in accordance with the GDPR, if applicable.
- iv. The user can grant permission to RSP, for example by replying to our notification by email. Please note: If you are not registered as the owner of the vehicle in RSP Connect, you cannot grant permission yourself, and we ask you to contact the owner to grant such permission.
- v. Once approved, the third party will be created as a user with a corresponding role in RSP Connect and will be able to download the same data as the user.

g) How to stop data sharing with third parties:

- i. The user must inform RSP, for example by e-mail, and request that data sharing with the respective third party be stopped.
- ii. The user can view their current open requests for data sharing.
- iii. The user can deactivate the request via a single data release.

h) How to delete product and related service data:

- i. You cannot delete data stored on the RSP superstructures of the vehicle itself.
- ii. Product data stored on RSP servers can be deleted by requesting deletion from RSP as a user.

3. Information on whether the potential data owner expects to use readily available data themselves, the purposes for which this data is to be used, and whether they intend to allow one or more third parties to use the data for purposes agreed with the user.

We use readily available data for our own purposes, but do not currently share this data with third parties. We use this data for (i) research, development and analysis, for example to monitor, maintain and improve the function and security of RSP structures, to fulfil our product monitoring and traffic safety obligations, or to develop new products or services, including artificial intelligence (AI) solutions, and (ii) to aggregate this data with other data.



to create aggregated or derived data for any lawful purpose, including selling or otherwise making such aggregated or derived data available to third parties, or for any other purpose specified in the current version of the RSP Connect General Terms and Conditions that we have agreed with the user, or as covered by a legal basis under the GDPR. In addition, we use (iii) aggregated location data for statistical evaluations of usage regions for the purpose of planning and expanding our sales organisation and service partner network. We use product data (iv) to derive machine-specific service intervals, which, for example, trigger invitations to service inspections by authorised specialist workshops (individual customer service), but also to (v) make claims for rectification of defects objectively verifiable.

4. The identity of the potential data owner, e.g. their trade name and the address of the place where they are established, as well as, where applicable, other data processing parties and the means of communication through which the potential data owner can be contacted quickly and communicated with efficiently

a) Data owner and contact information

The data controller within the meaning of the EU Data Protection Regulation is:

RSP GMBH & CO. KG
Zum Silberstollen 10
07318 Saalfeld/Saale Germany

Email/contact: You can contact customer support by email at rsp-connect@rsp-germany.com or by telephone on +49 36 71 57 21 0

RSP GmbH & Co. KG is not the owner of any trade secrets with regard to data regulation.

b) Processor

We use the following processor: Proemion GmbH Donaustraße 14 36043 Fulda Germany.

5. The duration of the contract between the user and the potential data owner, as well as the terms for early termination of such a contract.

The term of the agreements between you and RSP is based on the special provisions for the respective service and begins when the user activates the service in RSP Connect. Ordinary termination is excluded during the term.

6. The user's right to lodge a complaint with the competent authority regarding a breach of any of the provisions of this chapter

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 (Article 38 EU Data Protection Regulation).



7. Changes to this information on related service data

New legal requirements, company decisions or technical developments may lead to changes to this information on related service data and require us to amend this document with information on related service data accordingly. 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.