

AL-KO product data information according to regulation (EU) 2023/2854

As a manufacturer of connected products, AL-KO Geräte GmbH ("AL-KO") is committed to ensuring transparency about how those products generate data about their use and performance, and how our customers can access that data or share it with third parties, in accordance with the Data Act (EU Regulation 2023/2854).

Connected products or related services generate data during their use. The following sections inform about the generated data related to the product or related service and how the product data can be accessed.

Data Generation

AL-KO offers a range of connected products across different product categories. The data generated depends on the specific product in question and the volume of data will depend on the actual usage patterns. Only data that is raw or pre-processed and that AL-KO has readily available will be included. Highly enriched data and content data are outside the scope. The data available can be clustered into the following datasets. For information about which data is available for a specific product category, please check the Product Data Summary section.

- **Device Attributes Data**
Data containing device information such as the device identifier, device model, serial and article number and firmware versions currently installed.
- **Device Settings Data**
Data containing information about the device settings such as delay after rain or mowing windows.
- **Device Status and Sensor Data**
Data containing information about the state of the device such as its operation mode as well as data detected by the sensors of the device such as rain, bumper, loop signal, motor motion etc.
- **Device Connection Data**
Data containing information about the connection state and the signal strength.
- **Location Data**
Data containing information about the location of a device or garden.

As the available data differs between product categories and between products within a category, it is not possible to further specify the particular datapoints that are generated. When accessing the data, all readily available raw or preprocessed data of the product will be made available.

Data Location

The data generated by AL-KO connected products can be either stored on the device (On-Device-Storage) or on remote server (Remote-Server-Storage). In the latter case, the data is stored on server in the EU.

Data Volume

The amount of data varies depending on the usage of the products connected to the service, with data volumes up to 1 MB per day.

Data Access

Access to, and retrieval and deletion of user generated product data stored on the device can be requested by the user when servicing the product at a AL-KO Service Agent. Please contact your AL-KO Service Agent for more details.

Access to, and retrieval and deletion of user generated product data stored on remote server can be requested by the user via the AL-KO Smart Cloud API. Please use the form in the AL-KO InTouch app to request access to the AL-KO Smart Cloud API.

Product Data Summary

Products listed below can, when used, generate data continuously and in real time as indicated below. The actual data generated depends on the specific use of the product.

Data stored on the device

Dataset	Product	Data Format	Data Storage	Retention	Access
Attributes Data	Robolinho, Charger, Lawnmower, Battery, Tractor	Json / binary	Local	Product live time	Display, InTouch BLE . Wifi-AP-Mode
Settings Data	Robolinho, Charger	Json / binary	Local	Until factory reset	Display, InTouch BLE . Wifi-AP-Mode
Status and Sensor Data	Robolinho, Charger, Lawnmower, Battery, Tractor	Json / binary	Local	Until rest	Display, InTouch BLE . Wifi-AP-Mode
Connection Data	Robolinho, Charger, Lawnmower, Battery, Tractors	Json / binary	Local	Until rest	Display, InTouch BLE . Wifi-AP-Mode

Data stored on remote server when cloud connectivity is enabled

Dataset	Product	Data Format	Data Storage	Retention	Access
Attributes Data	Robolino, Charger, Lawnmower, Battery, Tractors	json	Remote Server	Unlimited	AL-KO InTouch, AL-KO Service Dashboard, AL-KO Smart Cloud API
Settings Data	Robolino, Charger	json	Remote Server	Unlimited	AL-KO InTouch, AL-KO Service Dashboard, AL-KO Smart Cloud API
Status and Sensor Data	Robolino, Charger, Lawnmower, Battery, Tractors	json	Remote Server	Unlimited	AL-KO InTouch, AL-KO Service Dashboard, AL-KO Smart Cloud API
Connection Data	Robolino, Charger, Lawnmower, Battery, Tractors	json	Remote Server	Unlimited	AL-KO InTouch, AL-KO Service Dashboard, AL-KO Smart Cloud API

Related Services Data Summary

Related Services listed below can, when used, generate data continuously and in real time as

Dataset	Service	Data Format	Data Storage	Retention	Access
Location Data (when using the mowing recommendations feature)	AL-Ko InTouch	json	Remote Server	Until account revocation	AL-KO Smart Cloud API

indicated below. The actual data generated depends on the specific use of the related service.

Right of Appeal

In the event that you believe that your rights under Regulation (EU) 2023/2854 have been violated, you have the right to lodge a complaint with the competent authority responsible for supervising compliance with Regulation (EU) 2023/2854.

Terms and Conditions

In order to request access to your own connected product data, you are first required to agree to the terms of the Data Access Agreement.

The access rights and restrictions on use of data by AL-KO and users are attached as an appendix.

Data Holder

AL-KO Geräte GmbH, Ichenhauser Straße 14, 89359 Kötz, Germany

If you have any questions, please refer to www.alko-garden.de, where you will find relevant contact details.

Appendix

Data use and sharing by the Data Holder (AL-KO)

Agreed use of non-personal Data by the Data Holder

The Data Holder undertakes to use non-personal Data only for the purposes agreed with the User as follows:

- (a) performing any agreement with the User or activities related to such agreement;
- (b) providing support, warranty, guarantee or similar services or to assess User's, Data Holder's or third party's claims (e.g. regarding malfunctions of the Product) related to the Product or Related Service;
- (d) improving the functioning of any Product or Related Service offered by the Data Holder;
- (e) developing new products or services, including artificial intelligence (AI) solutions, by the Data Holder, by third parties acting on behalf of the Data Holder (i.e., where the Data Holder decides which tasks will be entrusted to such parties and benefits therefrom), in collaboration with other parties or through special purpose companies (such as joint ventures);
- (f) aggregating these Data with other data or creating derived data, for any lawful purpose, including with the aim of selling or otherwise making available such aggregated or derived data to third parties, provided such data do not allow specific data transmitted to the Data Holder from the connected product to be identified or allow a third party to derive those data from the Dataset.

The use of the Data for the above purposes is necessary for the full enjoyment of the Product and Related Service by the User, for instance in respect of maintenance, diagnostics and repair, and the provision of automation, smart home monitoring services and in-product features. Certain Product features require Data Holder to hold Data in order for the feature to be available.

Data use by the User

Permissible use and sharing of data

The User may use the Data made available by the Data Holder upon their request for any lawful purpose and/or share the Data freely subject to the limitations below.

Unauthorized use and sharing of data

The User shall not:

- (a) use the Data to develop a connected product that competes with the Product, nor share the Data with a third party with that intent;

- (b) use Data to derive insights about the economic situation, assets and production methods of the Product manufacturer or, where applicable, the Data Holder;
- (c) use coercive means to obtain access to Data or, for that purpose, abuse gaps in the Data Holder's technical infrastructure which is designed to protect the Data;
- (d) share the Data with a third-party considered as a gatekeeper under article 3 of Regulation (EU) 2022/1925;
- (e) use the Data they receive for any purposes that infringe EU law or applicable national law.