Gimasi

Information on GIOT (the "related service") pursuant to Article 3(3) of the Data Act

Connected product data that the provider is expected to receive:

The connected products (Level Meter and Low-Cost Tracker) generate product data in the form of telemetry (e.g., measurements, location data, status information).

- The estimated volume of product data is approximately **0.5-1 KB per transmission per device**, depending on configuration.
- Data collection occurs at **configurable intervals or event-based**, depending on device settings.
- Data is transmitted via secure communication protocols (e.g., MQTT) and stored on the GIOT platform for the duration of the contractual relationship, subject to applicable retention policies.

Users may access and retrieve product data via the GIOT dashboard, API interfaces, or data export functionalities.

• Related service data to be generated:

Related service data includes data generated during the use of the service, such as **usage logs, access records, system events, and diagnostics data**.

- The estimated volume of related service data is approximately **0.5-1 KB per user action or system event**.
- Such data is generated **event-based** during interaction with the GIOT platform.
- Related service data is stored on GIOT servers for the duration of the contractual relationship and in accordance with applicable retention policies.

Users may access relevant related service data (e.g., logs, activity records) via the GIOT dashboard or upon request, where applicable.

• Additional Clarifications

- Data volumes are estimates and may vary depending on device configuration and usage.
- Collection frequency depends on device settings and user interaction with the service.

• Modalities regarding the storage and duration of the data by the provider:

- The following technical means are available to the customer with regard to the aforementioned data.:
  - Access to the data:
    1. **Web-Based Dashboard (GIOT Portal):**
       Authenticated users can securely log in to the GIOT web platform via browser to view device data, telemetry, historical records, and account-related information.
    2. **Role-Based Access Control (RBAC):**
       Access is restricted based on user roles and permissions to ensure data visibility is limited to authorized users only.
    3. **Secure Communication:**
       All data access occurs over encrypted HTTPS (TLS) connections.

Gimasi Deutschland GmbH
Lindwurmstr 97a, 80337 München
DE319590118
+49 89 20002118-0
support@gimasi.de

4. **Real-Time & Historical View:**
   Data can be displayed in real time and through historical charts, logs, and reports within the platform.

- Data retrieval

1. **API Access:**
   GIOT provides secure REST API endpoints enabling customers to programmatically retrieve their data for integration with third-party systems.
2. **Data Export Functionality:**
   Users can export data from the dashboard in standard formats such as CSV and/or JSON.
3. **Authentication & Security:**
   API access is secured via API keys.

- Deletion of data:

1. **Account Deletion Request:**
   Customers may request deletion of their account and associated personal data through the platform or by contacting support.
2. **Device Removal:**
   Customers may request deletion of devices, and all associated data will be deleted.
3. **GDPR Data Erasure Mechanism:**
   GIOT supports formal data erasure requests in accordance with GDPR Article 17 ("Right to be Forgotten"). Upon verified request:
   a. Personal data is deleted from active systems.
   b. Data is removed from backups according to the defined retention cycle.
   3. A confirmation of deletion is provided

4. **Data Retention Policy:**
   Data is retained only for the period necessary to provide the service or to meet legal obligations.

- For the aforementioned technical means

The following terms of use apply:

- Access to GIOT is restricted to registered and authenticated users.
- Users are responsible for maintaining the confidentiality of login credentials and device authentication keys.
- Devices (e.g., connected Level Meter and Low Cost Trackers[AM1]) must be properly configured and authorized before transmitting data via MQTT.
- API access is subject to authentication, authorization, and reasonable rate limits.
- The service may only be used in compliance with applicable laws and the contractual agreement between the parties.

The following service quality applies:

- Target system availability of 99% monthly uptime, excluding scheduled maintenance.
- Telemetry transmission frequency depends on device configuration (interval-based or event-based).

- MQTT communication supports configurable Quality of Service (QoS) levels (0, 1, or 2).
- Scheduled maintenance, where possible, is communicated in advance.

The provider does not expect to use readily available data for its own independent commercial purposes.
The data is used solely for the following purposes:

- Provision and operation of the GIOT platform;
- Processing and visualization of telemetry data from connected devices;
- Ensuring connectivity, system security, and performance monitoring;
- Troubleshooting, diagnostics, and service improvement (in aggregated or anonymized form where applicable);
- Compliance with legal obligations.

The provider does not intend to allow one or more third parties to use readily available data for independent purposes.
Access may be granted only to contracted data processors (e.g., cloud infrastructure providers) acting under binding data processing agreements, or to third parties explicitly designated by the user.

Precise identity of the potential data holder:
Gimasi Deutschland GmbH
Lindwurmstrasse 97a,
80337 München, Germany
DE319590118]
support@gimasi.de

Where applicable, contracted cloud hosting providers act as data processors.[AM2]

Communication methods that allow the provider to be contacted quickly and communicated with efficiently:

- Gimasi Deutschland GmbH
- Lindwurmstrasse 97a, 80337 München
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- +49 89 20002118-0
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The user can request that the data be shared with a third party as follows:

- By generating and providing API credentials to the designated third party;
- By exporting data in standard formats (e.g., CSV or JSON);
- By enabling MQTT forwarding or webhook integrations where supported.

The user can stop data sharing as follows:

- By revoking API credentials;
- By disabling integrations within the platform;
- By removing third-party access permissions;
- By submitting a request to GIOT support.

The user has the right to lodge a complaint with the competent authority referred to in Article 37 of the Data Act regarding a breach of any of the provisions of Chapter II of the Data Act.

The data accessible via the connected product or generated during the provision of the related service does not contain trade secrets of the provider.
Proprietary algorithms, firmware logic, and internal platform architecture are not disclosed and remain protected as trade secrets.

Trade secret owner:
Gimasi Deutschland GmbH

The following applies to the contract between the user and the provider:

- **Duration:**
  The contract is valid for the agreed subscription period and renews automatically unless terminated in accordance with the contractual terms.
- **Modalities for early termination of the contract:**
  Either party may terminate the contract with 14 days' written notice, unless otherwise agreed. Immediate termination is possible in case of material breach of contract. Upon termination, access to the service is disabled and data is handled in accordance with the applicable retention and deletion policy.

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