

BrainOS-powered Nilfisk SC60 Data Frequently Asked Questions



Brain Corporation, or Brain Corp, is a technology partner to Nilfisk. The autonomous operation of the Nilfisk SC60 floor cleaning machine is powered by Brain Corp's proprietary software platform, BrainOS. Machine data is collected and, at times, transmitted to Brain Corp to enable the SC60 autonomy services, including providing navigation, operational support, and fleet management. As part of the process to enable the Brain Corp autonomy services all customers, or End Users, must agree to a software End User License agreement (EULA).

The purpose of this document is to provide an overview of the machine data processed by Brain Corp as part of its autonomy services offering as well as data which may be processed by Brain Corp as part of the optional autonomy service features (i.e., Brain Corp operational portal and operator notification feature). It has been developed to proactively answer a common list of questions from End Users of the SC60 autonomy services. While this document is intended to highlight Brain Corp's usage of data related to the autonomy services in light of the privacy laws where SC60s are sold, this is not a contractual or legally binding document.

1) What kind of data is transmitted to Brain Corp by the SC60 machine?

BrainOS integrates with onboard sensors and cameras in order to ensure safe and effective machine operation. During use, the SC60 processes machine data from these sensors, as well as images from the cameras, to generate a series of machine data event streams. These event streams include information about the following aspects of a machine: telematic data, performance, usage, machine conditions, asset tracking, speed, odometry, battery usage, system functionality, software/firmware versioning, site identifiers, safety metrics, cleaning schedule, and machine maintenance. All machine data generated from the use of the SC60 is operational in nature.

2) Why does Brain Corp collect machine data?

The SC60 collects machine data in order to enable effective autonomy services. It uses the information to localize itself within the environment, generate routes (e.g., "teach and repeat"), perceive and avoid obstacles, operate safely, and to continuously improve the machine's performance.

3) Which data-connectivity devices are used by the SC60 to transmit machine data to Brain Corp?

SC60 machine data is transmitted to Brain Corp via a cellular modem embedded within the SC60.

4) How does the transmission of data from the SC60 to Brain Corp work?

As the SC60 operates autonomously and acquires data, the information is stored onboard the machine in an encrypted format. At times, the machine may securely transfer limited data from the SC60 to Brain Corp's cloud-based operations' environment. This communication and transmission is independent of any End User's systems or corporate environment. Any remaining data on the machine is stored on a local hard drive storage routinely overwritten based on the usage of the machine, which under normal use would occur approximately every thirty days.

5) Does the SC60 collect images of the contents of locations it cleans? How are images used?

From time to time, the SC60 may depend upon assistance for operation from an End User or remotely from Brain Corp, such as when the SC60 detects obstacles or other unanticipated environmental features. When such an event occurs, its onboard camera images may be transmitted to Brain Corp (along with other machine data) to facilitate assistance and support. The image data includes the time and date the SC60 captured the image along with the related End User site name. Brain Corp does not transmit, process, or store image data with the intent to uniquely identify a natural person nor does it seek additional data sources such that it could identify a natural person. Further, Brain Corp has taken the additional step of configuring BrainOS to blur irreversibly the faces of individuals in images captured by the onboard cameras.

6) Why does Brain Corp make available the EULA Data Protection Addendum (DPA) and why does the document refer to personal data?

The EULA [Data Protection Addendum](#) (DPA) explains Brain Corp's processing of personal data. It also explains how Brain Corp complies with the legal requirements for the processing and transferring of such personal data related to the provision of the autonomy services.

7) What does Brain Corp consider to be personal data?

Brain Corp considers certain data, including first name, last name, username, password, and mobile phone numbers, which may be provided to Brain Corp by the End User as part of the optional autonomy service features (i.e., Brain Corp operational portal and operator notification feature) to be personal data.

8) What does "processing" personal data mean, and how does Brain Corp process personal data?

Processing includes using, analyzing, transferring, sharing, and/or storing personal data. Brain Corp processes the contact information of an End User who logs in to Brain Corp's operational portal and/or uses the operator notification feature for the following purposes:

- Provisioning, support, and maintenance of Brain Corp autonomy services
- Access to the Brain Corp operational portal
- Display of product or services updates
- Receipt of machine notifications
- Handling of support tickets and requests

9) How does the SC60 involve personal data?

Brain Corp's optional autonomy service features involve personal data if the End User elects to use them (i.e. Brain Corp operational portal and operator notification feature).

The autonomy services of SC60 only involve personal data if the End User elects to use certain optional autonomy service features (i.e., Brain Corp operational portal and operator notification feature)

10) Does Brain Corp share personal data with third parties?

To enable certain autonomy service features, Brain Corp may share certain personal data provided by the End User (e.g., contact information, credentials, mobile number, etc.) with sub-processors, only as needed, in order to support the SC60 optional autonomy service features. A list of Brain Corp's sub-processors is available [here](#).

11) Will Brain Corp process any sensitive personal data?

Brain Corp does not process sensitive personal data (i.e., racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data) related to the autonomy services offered with the SC60, nor has it instructed its sub-processors to process sensitive personal data on Brain Corp's behalf.

12) What is the GDPR, and why does the EULA Data Protection Addendum refer to it?

GDPR refers to the European Union (EU) General Data Protection Regulation. The GDPR sets out guidelines that entities must meet when processing personal data about

individuals who reside within the EU. The Data Protection Addendum, which explains Brain Corp's processing of personal data, is one aspect of Brain Corp's compliance program under the GDPR.

13) What are Standard Contractual Clauses ("SCCs")?

Standard Contractual Clauses provide a lawful and secure transfer of personal data from within the European Economic Area (EEA) to non-EEA countries, and govern the processing of personal data outside the EEA. Brain Corp's EEA-based End Users may have their personal data transferred to Brain Corp's sub-processors in the United States, hence the inclusion of SCCs within the DPA.

14) How does GDPR apply to Brain Corp End Users?

If an agent of the End User resides in the EU and provides contact information to Brain Corp when using the optional autonomy service features (i.e. Brain Corp operational portal or operator notification feature), Brain Corp ensures that usage enables the End User to receive the rights outlined within the GDPR.

15) What happens if an End User does not accept the EULA's Data Protection Addendum?

The End User may elect not to access the optional autonomy features which require the usage of personal data as detailed in the Data Protection Addendum. Without such features the machine will still function autonomously but the End User would not receive machine notifications, have access to reporting, or correspond with Brain Corp's support team.

Links to more information:

- Brain Corp's [Data Privacy Policy](#)
- Brain Corp's [Data Protection Addendums](#)
- Brain Corp's [Robot Data Whitepaper](#)

