

Nilfisk machine data FAQ

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This document is a list of **questions and answers** that may be relevant for Nilfisk customers who have questions about the Nilfisk Data Terms, which are appendices to Nilfisk contracts for the sale or lease, to customers, of Liberty machines and/or TrackClean or other connectivity devices. **This is not a contract document.**

Nilfisk machines that transmit data about their operation to Nilfisk:

Liberty SC50 models:

- Data is transmitted via attachable/detachable connectivity device specific to Liberty
- Liberty models currently also transmit data via TrackClean devices – see below

Manual machines:

- Transmit data via attachable/removable data-transmitting connectivity devices or other remote solutions

What kind of data is transmitted to Nilfisk by machines and connectivity devices?

Machine performance and application environment.

Basic information on how, when, and where a machine is operated (e.g. GPS data):

- Example: Name and address of operational location, which allows for quick troubleshooting and service

Problems and malfunctions.

Liberty machines also collect large volumes of detailed operational data in data logs, such as details:

- On short- and long-term operation
- Enabling faster troubleshooting and service

All such data involves machine operation ONLY, and does not include the names of any persons.

Why does Nilfisk collect machine data?

To service customers by advising on potential improvements to a machine's operational efficiency:

- We analyze data and provide the customer with reports on how a machine is being used
- We advise customers on how they can use machines more efficiently
- Machine data helps Nilfisk enhance machine service and maintenance

To improve and develop new machines and services:

- We provide targeted solutions to specific customer sectors
- We create more efficient and cost-effective solutions
- We improve machine performance over time based on data collected

Which data-connectivity devices are used with Nilfisk machines to transmit machine data to Nilfisk?

Attachable/detachable connectivity devices for all Nilfisk machines, e.g. TrackClean units:

- Send basic data about how, when, and where a machine is being operated (e.g. GPS)
- Are also used with Liberty machines

Nilfisk digital services such as apps, e-mails and e-mailed reports, and web-portal solutions:

- Send notices to a customer’s designated employees (e.g. site or fleet managers) about e.g.:
 - Use and operation of individual machines (e.g. required maintenance, machine reports)
 - Management of the customer’s fleet

Liberty-specific connectivity devices transmitting basic operation data and data-log files, e.g.

- Log files: Data-heavy collection of machine information, including images from machine sensors, when needed for machine service and repair

How does the transmission of data from machines to Nilfisk work?

Data-transmission occurs via a connectivity device (see above), such as:

- An IoT (Internet of Things) module built into certain machines (e.g. SC50) using either a cellular network or WiFi
- Attachable/detachable connectivity devices that can be mounted on all Nilfisk machines, using a cellular network

Do Liberty machines collect images of the contents of locations they clean? How are images used?

Liberty machines contain camera sensors that collect such images when the machine:

- Is set to operate autonomously, and an operator scans a home-location tag against a background, and
- Experiences a problem, such as an obstacle that it cannot find a route around, at which point a frontal image is taken

Images are embedded with large volumes of other machine data in individual data logs, and:

- Nilfisk only reviews data logs for troubleshooting (e.g. machine repair or service)
- Images can only be accessed by an authorized Nilfisk remote-service team requesting transfer of data logs in order to service and repair a machine
 - Data logs are transmitted only on request by Nilfisk Remote Service teams (not automatically) for individual machines
- Nilfisk does not use images of the contents of locations for any purpose except assisting a customer in resolving machine-service issues

At the customer’s request, Nilfisk can:

- Instruct its remote-service technicians to never view images in data logs
- Continue transmitting basic machine data, but deactivate data-log collection
 - Thereby reducing Nilfisk’s troubleshooting ability, OR
- Fully deactivate all data-connectivity devices and cease all machine-data transmission
 - Nilfisk cannot send reports on machine operation, provide advice on enhanced improvement, or receive automatic notices of machine problems
 - Nilfisk’s remote and on-site service levels may also be restricted or impaired

Why does Nilfisk use the Data Terms, and why do they refer to Personal Data?

Data Terms are appendices to contracts for the sale or lease of Nilfisk machines.

They explain how Nilfisk processes machine data, and clarify both Nilfisk’s and a customer’s rights to the data.

They include legal requirements which Nilfisk must follow when processing Personal Data - See the next Q&A.

What is Personal Data?

A legal term meaning any information that identifies, or can be used to identify, a person.

It includes ordinary data (e.g. names, titles, telephone numbers and e-mail addresses):

- It also includes the legal term “sensitive personal data” (e.g. someone’s health status)

Nilfisk must follow specific legal requirements when processing Personal Data – See GDPR Q&A below.

What does “processing” Personal Data mean, and how does Nilfisk process Personal Data?

Processing includes using, analyzing, transferring, sharing, and/or storing personal data:

- Nilfisk uses some machine-generated data its machine operation reports to customers allowing them – but not Nilfisk - to identify their employees – see more details below
- Nilfisk uses employee contact information from customers to send machine notifications

How do Nilfisk machines involve Personal Data?

Customers can choose to use Nilfisk digital services (e.g. apps, e-mail reports, and web-portals) that allow employees or contractors, selected by customers, to receive automatic updates from Nilfisk on managing multiple machines, and on specific machine operation (e.g. need for immediate repair):

- Ordinary Personal Data – The customer provides Nilfisk with names and contact details for fleet and site managers, as well as other employees selected by the Customer to receive notifications:
 - Customers decide who is to receive such notifications
 - Nilfisk does not receive names of individual machine operators (unless customer decides they should also receive notifications)
 - See Access Terms Q&A below

Nilfisk uses data from a machine to report on its operation at a specific time, in a specific location:

- Such time and location data are Pseudonymized Personal Data that can be used by customers to identify a machine operator, even though Nilfisk does not know who operates the machine

See the next Q&A.

How do Nilfisk machines generate Pseudonymized Personal Data?

Data about a machine's operation, at a specific time and location, is sent to Nilfisk from the machine itself (e.g. Liberty SC50) or from a transmitting device on the machine, such as a TrackClean unit:

- The transmitted data does not identify the machine's operator

Nilfisk analyzes the data, and reports both the results and its findings, as well as any applicable suggestions, to the customer:

- The report includes how the machine was operated at a specific time and location

The customer can use Nilfisk's report and check its own records (e.g. employee logs) to identify who operated the machine at that time and location:

- Although Nilfisk's report does not identify anyone, this is Pseudonymized Personal Data because the customer can use it, along with its own records, to identify the operator

Does Nilfisk share Personal Data with third parties?

Nilfisk shares Pseudonymized Personal Data and other machine data with its sub-processors in order to analyze machine operation and provide customers with machine-operation reports.

Nilfisk shares with certain sub-processors the Ordinary Personal Data (names and contact details) provided by the customer – only as needed – in order to send notifications to persons the customer has designated.

Nilfisk sub-processors are subject to the same requirements as Nilfisk.

What if I don't want Nilfisk to share Personal Data with its sub-processors?

Nilfisk sub-processors provide necessary support enabling Nilfisk to process data and reports:

- If Nilfisk cannot share data with a specific sub-processor, Nilfisk may not be able to provide all or any of its data-processing and reporting services

Will Nilfisk process any sensitive personal data?

NO. The Data Terms prohibit customers from sending such data to Nilfisk, and require Nilfisk to delete any such data it receives by mistake.

What is the GDPR, and why do the Data Terms refer to it?

GDPR is the European Union (EU) General Data Protection Regulation 2016/679:

- It sets out rules on how companies based in the EU may process personal data
 - They must follow GDPR when processing personal data sent from any country
 - This includes countries outside the EU
 - Companies can face heavy fines for violating GDPR
- Personal data must be processed securely on a need-to-have, need-to-share basis
- EU companies may only process personal data under a Data Processing Agreement (DPA)
 - Nilfisk's Data Terms make up the type of DPA required by GDPR

Nilfisk must comply with GDPR because its HQ in Denmark (EU member country) receives personal data from customers and their machines, such as:

- Employee names and contact information sent by customers
- Pseudonymized Personal Data in Nilfisk's machine reports to customers – See above

What are EU Standard Contract Clauses data-transfer agreements?

GDPR requires Nilfisk to use such agreements if it transfers Pseudonymized Personal Data or Ordinary Personal Data to a sub-processor located outside the EU, Iceland, Lichtenstein or Norway:

- These agreements use wording that is legally required by GDPR
- These agreements require sub-processors to process data received securely, confidentially, and as instructed by Nilfisk and/or its customers

How does GDPR apply to Nilfisk customers?

Only customers based in the EU must comply with GDPR:

- EU customers must enter into a Data Processing Agreement (DPA) (e.g. Data Terms)

Customers outside the EU are not subject to GDPR but must still accept the Data Terms:

- Nilfisk risks large fines if it processes machine data without a DPA, as required by GDPR

Do countries outside the EU have similar data privacy laws?

Yes. An increasing number of countries and states/provinces are implementing similar laws:

- California and Quebec have imposed similar restrictions and requirements

What happens if a customer does not accept the Data Terms?

The customer may use the machines without any data-transmission devices or systems.

Nilfisk can only provide significantly reduced machine service and repair, whether on-site and remotely.

Nilfisk cannot analyze machine data, nor can it provide reports or notifications on machine operation:

- Because some machine data is Pseudonymized Personal Data under GDPR, Nilfisk may only process such data under a written processing agreement, such as the Data Terms

What are the Access Terms listed as an appendix to the Data Terms?

Customers selecting Nilfisk solutions that notify them about machine operations will send Nilfisk a list of their employees who will receive the notifications, along with their e-mails and/or cell phone numbers.

Customers agree their employees must follow the Access Terms when using those solutions.

Employees must read and acknowledge the Access Terms in order to access those solutions.

Links to more information:

- See the Data Terms [here](#)
- See the Access Terms [here](#)
- See more technical information [here](#)