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https://cn-mobility.eu/de/datenschutz/tom

Technical and organizational measures for DiLoc products

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0. Document Information

0.1. Change Log

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0.2. Approvals

Department	Name	Function	Date
Management	Christian Neumann	Managing Director – CEO	22.04.2026

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1. General Information

cn-mobility GmbH and its contractors have taken the necessary technical and organizational measures, taking into account the state of the art, the costs of implementation, the nature, scope, context, and purposes of the processing, as well as the likelihood and severity of the risks to the legal interests of the data subjects associated with the processing, to take the necessary technical and organizational measures to ensure a level of security appropriate to the risk when processing personal data, particularly with regard to the processing of special categories of personal data. In doing so, the controller must take into account the relevant technical guidelines and recommendations of the Federal Office for Information Security.

2. Technical organisational measures in accordance with Art. 32 GDPR

cn-mobility GmbH has implemented appropriate measures for confidentiality, integrity, availability and resilience as well as procedures for regular review, evaluation and evaluation.

2.1. Measures for pseudonymisation and encryption of personal data

2.1.1. DiLocSync Cloud

- The pseudonymisation and encryption of personal data processed on behalf of the controller is the responsibility of the controller.

2.1.2. DiLocSync Backup

- Encryption of the stored data can be done by means of a key defined by the controller.

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2.2. Measures to ensure the confidentiality, integrity, availability and resilience of the systems and services related to the processing

2.2.1. Access control

Objective: To deny unauthorised access to processing facilities used to carry out the processing.

2.2.1.1 Data centers used by cn-mobility

- All data centers are certified according to the ISO 27001 standard
- Electronic access control systems monitor and ensure access to the respective data center only for authorized persons
- Access to the building is regulated via security gates
- Video cameras as well as burglar and contact detectors monitor the outer skin of the building
- Defined safety zones
- Alarm message in the event of unauthorized access to data centers
- 24/7 staffing of the data centers
- Guidelines for accompanying and marking guests in the building

2.2.1.2 Access protection and visitor management

- Reception and security service
- Individual, documented and role-dependent access authorizations (cards, transponders and keys)
- Office space is locked outside working hours
- Visitor passes
- Visitors are only allowed to be in the building if accompanied by an employee
- Personnel from third parties, especially for cleaning and maintenance tasks, are carefully selected
- Fire and/or smoke detector has a direct connection to the local fire department
- Formal User and Authorization Procedures
- Systemically enforced password policies
- Login only with username, password and, where required, 2-factor authentication
- VPN for remote access and by devices managed by the controller
- Automatic locking of desktops after a few minutes of inactivity
- Clean Desk Policy

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2.2.2. Disk Control

Objective: Prevention of unauthorized reading, copying, modification or deletion of data carriers

2.2.2.1 Data centers used by cn-mobility

- Memory blocks are deleted on return in an unrecoverable way
- Defective and discarded data carriers are physically destroyed

2.2.2.2 Internal management systems

- Data carriers are used restrictively (as far as possible) and encrypted
- Discarded data carriers are deleted or physically destroyed in accordance with data protection regulations

2.2.3. Memory Control

Goal: To prevent the unauthorized entry of personal data as well as the unauthorized access, modification and deletion of stored personal data.

2.2.3.1 For the products DiLoc|Sync and DiLoc|Motion

- The access rights (for both users and administrators) are based on the task-related and data protection requirements (authorization concept according to the need-to-know principle),
- write access to personal data (input, modification and deletion) is logged and can be evaluated,
- the systems to be administered by the customer contain privacy-friendly default settings.

2.2.3.2 In the processor's internal management systems

- Logging and traceability of entries, changes and deletion of data (through log files)
- Access rights are based on the task-related and data protection requirements (authorization concept according to the need-to-know principle)

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2.2.4. User Control

Objective: To prevent automated processing systems from being used by unauthorised persons with the help of devices for data transmission.

2.2.4.1 For the products DiLoc|Sync and DiLoc|Motion

- The implementation of user control measures is the responsibility of the controller
- The processor supports the controller by providing product-specific functions to control the authorizations of its users as well as by providing product-specific logging mechanisms

2.2.4.2 In the processor's internal management systems

- Access rights (for both users and administrators) are based on the task-related and data protection requirements (need-to-know principle)
- Separation of application and administration access
- Regular control of the assigned authorizations
- VPN technology is used for data communication
- Maintenance and updating of existing virus protection (antivirus software)

2.2.5. Access control

Objective: To ensure that those entitled to use an automated processing system have access only to the personal data covered by their access authorisation.

2.2.5.1 For the products DiLoc|Sync and DiLoc|Motion

- The implementation of access control measures is the responsibility of the controller
- The processor supports the controller by providing product-specific functions to control the authorizations of its users as well as by providing product-specific logging mechanisms

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2.2.5.2 In the case of the processor's internal management systems,

- Access rights (for both users and administrators) are based on the task-related and data protection requirements (need-to-know principle)
- Separation of application and administration access
- Regular control of the assigned authorizations#
- Maintaining asset registers and deriving measures based on data classification
- Password policies incl. password length and password change requirements

2.2.6. Transmission control

Objective: To ensure that it is possible to check and determine where personal data has been or can be transmitted or made available with the help of data transmission facilities

2.2.6.1 For the products DiLoc|Sync and DiLoc|Motion

- The implementation of transmission control measures is the responsibility of the controller
- Dedicated endpoints secured over HTTPS
- Logging of access (input, modification and deletion)

2.2.6.2 In the processor's internal management systems

- Provision of data via encrypted connections
- Disclosure of personal data in the sense of the Needto-Know- / Need-to-Do principle
- Personal data is classified according to their need for protection, whereby confidential data may only be transmitted via secure communication channels
- Email encryption is used where possible
- Where possible, personal data will only be transmitted in pseudonymized or anonymized form
- Sharing paper documents containing personal data in a sealed opaque envelope

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2.2.7. Input control

Objective: To ensure that it is possible to check and determine which personal data have been entered or changed into automated processing systems, at what time and by whom

2.2.7.1 For the products DiLoc|Sync and DiLoc|Motion

- The processor supports the controller by providing product-specific functions for transfer control, such as:
  - Dedicated HTTPS secured endpoints
  - Logging of access (input, modification and deletion) via audit log

2.2.7.2 In the processor's internal management systems

- Use of personalized and unique user identifiers
- Logging and traceability of entries, changes and deletion of data

2.2.8. Transport control

Objective: To ensure that the confidentiality and integrity of the data are protected when personal data is transmitted and when data carriers are transported

2.2.8.1 For the products DiLoc|Sync and DiLoc|Motion

- Communication with the services of the product is only possible via encrypted HTTPS connections
- Regular, automated update of TLS certificates

2.2.8.2 In the processor's internal management systems

- Communication through network segments that are not under the control of the organization itself is done through a secure channel
- Use of VPN technology (TLS) for data communication
- Email encryption is used where possible
- In the case of physical transport, suitable transport persons are carefully selected

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2.2.9. Earmarking

Goal: To ensure that collected personal data is only used for the originally intended purpose

2.2.9.1 With the product DiLoc|Sync

- The transfer of personal data is carried out exclusively by means of TLS encryption
- Collected signatures of the form function are watermarked so that they cannot be used elsewhere

2.2.10. Reliability

Objective: To ensure that all functions of the system are available and that any malfunctions that occur are reported

2.2.10.1 For the products DiLoc|Sync and DiLoc|Motion

- The implementation of measures to ensure the reliability of processing carried out by the Controller within the Products is the responsibility of the Controller
- A resilient system architecture is used where possible
- Continuous monitoring of system availability
- Automatic identification of malfunctions
- Troubleshooting Malfunctions in Incident and Problem Management
- Defined escalation and information channels in the event of malfunctions

2.2.10.2 In the processor's internal management systems

- Continuous monitoring of the availability of production-relevant systems
- Automatic identification of malfunctions of production-relevant systems
- Handling Malfunctions in Incident and Problem Management
- Defined escalation and information channels in the event of malfunctions

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2.2.11. Data Integrity

Objective: To ensure that stored personal data cannot be damaged by system malfunctions

2.2.11.1 With the product DiLoc|Sync and DiLoc|Motion

- The implementation of measures to ensure data integrity is the responsibility of the controller
- Storage of customer-owned data on resilient storage architecture with RAID technology
- Tested for functionality fully automatically by a renowned data backup software and at regular intervals. Full and incremental backups are created.
- Snapshot backup of entire servers before operating system updates

2.2.11.2 In the processor's internal management systems

- Data backup of production-relevant systems and information

2.2.12. Order control

Objective: To ensure that personal data processed on behalf of the client can only be processed in accordance with the instructions of the client

- Data processed on behalf of the client will only be processed in accordance with the instructions of the client
- Contractors are carefully selected with regard to the technical and organisational measures taken to protect personal data
- Instructions on the handling of personal data are documented in text form
- Where necessary, data processing agreements or appropriate safeguards will be concluded for the transfer of data to third countries

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2.2.13. Availability control

Objective: To ensure that personal data is protected against destruction or loss. The availability of data processed on behalf is ensured by:

- Power supply is ensured by redundancies (emergency generators and UPS systems with n+1 redundancy)
- Surge protection of the building's outer skin against lightning strikes
- Air conditioning systems in data centers
- Fire alarm system and early fire detection in data centers
- Emergency manuals for data recovery, protection against accidental destruction and loss
- External audits and security tests

2.2.13.1 For the products DiLoc|Sync and DiLoc|Motion

- The implementation of measures to ensure data integrity is the responsibility of the controller
- Storage of customer-owned data on resilient storage architecture with RAID technology
- Regular backup of all customer data

2.2.14. Separability

Objective: To ensure that personal data collected for different purposes can be processed separately

2.2.14.1 For the products DiLoc|Sync and DiLoc|Motion

- The controller is responsible for implementing measures to ensure that personal data collected for different purposes can be processed separately
- Clear separation and traceability of customer access (logical separation through individual user profiles with password protection/separation of production and test infrastructure)

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2.3. Measures to ensure the recoverability and availability of personal data in the event of a physical or technical incident

2.3.1. Recoverability

Goal: To ensure that deployed systems can be restored in the event of a malfunction

2.3.1.1 For the products DiLoc|Sync and DiLoc|Motion

- Creation, updating of an effective backup and recovery concept
- Regular backup of all systems connected to the product
- Annual recovery tests of the backups

2.3.1.2 Internal management systems

- Creation of a backup and recovery concept
- Use of redundant systems (e.g. RAID) where necessary

2.3.2. Incident Management

- Documented process for detecting, reporting and documenting data breaches with the involvement of the data protection officer
- Documented procedure for dealing with security incidents with the involvement of the information security officer
- Logging and evaluation of incidents

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2.4. Regular review, evaluation and evaluation of the effectiveness of the technical and organisational measures

How is it ensured that the data security measures mentioned are regularly reviewed?

- Data protection officers and an information security officer have been appointed
- Establishment of a data protection and information security organization
- All employees are obliged to maintain confidentiality in the handling of personal data and are advised of confidentiality of communication - telecommunications secrecy
- Employees are sensitized to the handling of personal data through regular online training courses
- New employees receive information material regarding the handling of personal data
- A register of processing activities is maintained and data protection impact assessments are carried out as necessary
- Processes for exercising the rights of data subjects have been established
- Regular checks by the data protection officer

2.5. Implementation of the NIS2 Directive

We are aware that some of our customers fall within the scope of the NIS2 Directive and that we may be indirectly affected by this to ensure security in the supply chain. Against this background, we strive to implement the NIS2 regulations (according to the national implementation in Germany).

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