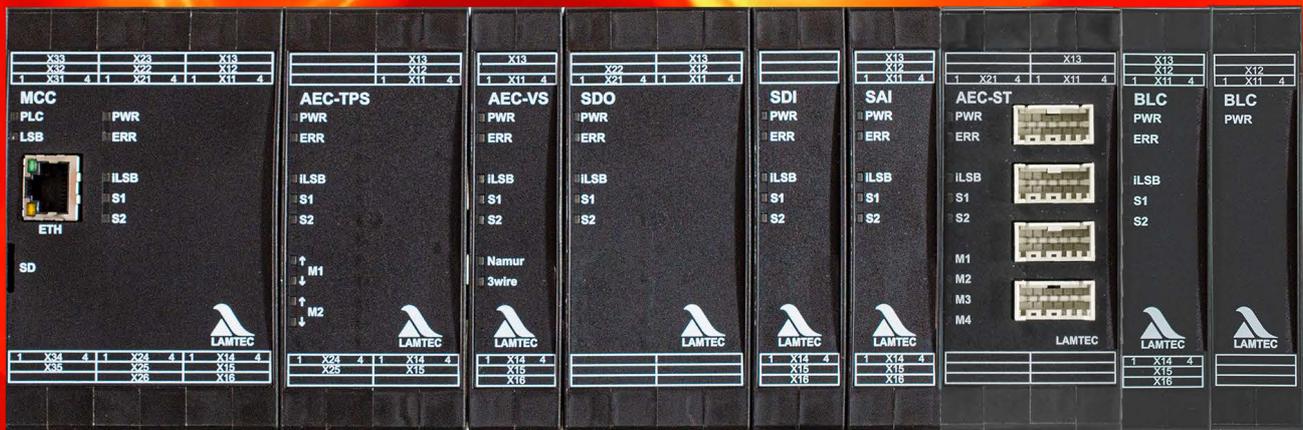


Combustion Management System CMS



Product information in accordance with
Regulation (EU) 2023/2854 (“Data Regulation”) for connected products

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1 EU Data Act (Regulation (EU) 2023/2854)

In accordance with Art. 3 Sect. 2 of the Data Act (Regulation (EU) 2023/2854), we hereby provide information about the product data and associated service data generated through the use of connected products and devices from LAMTEC GmbH&Co.KG.

The EU Data Act sets out clear requirements for access to and provision of device data and data from connected services. These regulations apply to all electronic field devices used in measurement and control technology. The EU Data Act gives users the right to access and use the data generated during operation of these devices.

Product data is generated during the use of the device. An obligation to provide this data on the part of the manufacturer (data owner) applies to all data (operating or process data) that is created or generated through the use of a product or a related service (associated service data), for instance, input and output data, sensor values, control commands and operating information such as modes, warnings or malfunctions.

Data that is collected exclusively during setup or commissioning and remains unchanged during ongoing operation is not affected by these requirements. This also applies to passwords and other information for protecting and restricting access and for complying with the General Data Protection Regulation (GDPR).

If this device data is read and processed exclusively by another entity or if no physical access to interfaces is granted, this entity is obligated to provide the user with the original device data. The information about device data and interfaces is then provided by the respective entity.

1.1 Cybersecurity vs. EU Data Act

The provisions of the EU Data Act may conflict with the requirements for secure data communication in accordance with cybersecurity standards if the interfaces are used improperly to access product data.

That is why it is essential to introduce and continuously develop comprehensive cybersecurity concepts for products, plants and systems that correspond to the current state of the art. The execution and ongoing assurance of appropriate security measures are the responsibility of the operator and users; for the CMS product, the information in TRBS 1115-1 currently applies. You can obtain these for the device from our support team (support@lamtec.de).

2 CMS product data and associated service data

This chapter describes the type of data that occurs and the frequency of its transmission during device operation. In addition, the interfaces and protocols for data access are explained and supplementary information on authentication and authorisation procedures is provided.

2.1 Use of data and disclosure to third parties

The user is free to use the product and device data of the CMS. If it passes on CMS data to third parties, for instance to online portals for data analysis or archiving, it must first enter into a contractual agreement with manufacturer LAMTEC GmbH & Co. KG as the data owner.

In principle, every user has the right to pass on data, but LAMTEC GmbH & Co. KG, as the data owner, reserves the right to set certain conditions, primarily to ensure functional safety, cybersecurity and questions of liability in the event of improper use through access to the data.

If LAMTEC GmbH & Co. KG wishes to use or store product data for its own purposes, an agreement with the user is also required for this. This does not apply to the additional processing of product data in order to ensure proper operation of the device.

If the user or its representative decides to send product data to LAMTEC GmbH & Co. KG or stores it in the LAMTEC support app, for instance, in order to process a service case, this will be deemed consent to the storage and processing of the data by LAMTEC GmbH & Co. KG. An objection will result in the data being deleted and the respective services being discontinued.

2.2 CMS product data

The 'CMS' product, with its connected components, is considered a single device. The primary data, which is exchanged between the components cyclically and in real time, is not the focus of the EU Data Act and is not described in more detail here.

2.2.1 CMS data

The primary data is used to generate process and operating data in the device, which can be accessed by the user through various interfaces. This product data is generated continuously and in real time.

The CMS device can contain the following components (modules), although not all of them need to be used. The MCC component is the main module of a CMS, which also provides the interfaces and protocols for data access.

- MCC: Master control component (main module)
- SDI: Safe Digital Input Component
- SDO: Safe Digital Output Component
- SAI: Safe Analogue Input Component
- AEC-TPS: Actuator Extension Component for three-point step AC motors
- AEC-VS: Actuator Extension Component for actuators
- AEC-ST: Actuator Extension Component for stepper motors
- BLC: Bus Link Component
- UI400: User interface
- GUI607/6xx: Touch screen user interface
- EBM112: Profinet interface
- NBM: Network Bus Module for VC 4.0 connectivity
- PC service software

The product data actually generated by the CMS during operation depends on the expansion stage, the configured and purchased additional functions as well as the individual application and commissioning parameters. The descriptions of the protocols and data points below always refer to the maximum available expansion stage of a CMS, as described in the product data sheet (available at www.lamtec.de).

During operation, the CMS cyclically stores or generates product data, which can be classified as follows:

- Operating and status messages, faults
- Fault, warning or information numbers
- Operating hours, burner start-ups and fuel meters
- System settings and parameters (only those important for operation)
- Input and output states
- O₂ and CO_e values (with additional devices)
- Process data and setting values (e.g. firing rate controller target and actual values)
- Parameters and curve data
- PLC data (LAMTEC BASE and TEC Center application)
- Device data (e.g. serial number, version)

2.2.2 TEC Center data

In addition, customer-specific PLC programmes (specific TEC Center projects) can be programmed or installed on the CMS MCC, which can generate additional product data. If necessary, this TEC Center data is also provided through the existing interfaces; however, its significance may vary depending on the PLC project.

The TEC Center projects are described in detail in the associated documentation for the respective PLC programmes by the responsible TEC Center and are available to users. If the documentation is only available to an intermediate entity (for instance, an OEM or project planner), this intermediate entity is obligated to pass on all information relating to the generated TEC Center data as well as the interfaces to the user.

2.2.3 Interfaces and formats

The CMS product data is provided during operation through a CAN bus-based proprietary fieldbus protocol (**LSB**, Lamtec System Bus) or, preferably, through the **Ethernet interface** integrated in the **MCC** component.

The standardised **Modbus TCP/IP** protocol is intended for use as a client on the Ethernet interface. The data format depends on the respective data content (numerical, binary, etc.). Detailed information about the available product data and the applied protocol can be requested from our support team (support@lamtec.de).

Another way to access product data is to access a limited data volume using the **EBM112** add-on module, which provides an Ethernet-based **Profinet** interface. The data format depends on the respective data content (numerical, binary, etc.). Detailed information about the available product data and the applied protocol can be requested from our support team (support@lamtec.de).

Users of these interfaces are responsible for executing and complying with appropriate cybersecurity measures that are suitable for their application. The full functionality of the device must also be maintained through the proper use of the communication interfaces by the user or an authorised third party.

2.2.4 Data volume and up-to-dateness

The Ethernet-based **Modbus TCP/IP** interface is available to users as a client in CMS/MCC for easy and comprehensive data access. No add-on modules or paid options are required for this. That means only this access option recommended by LAMTEC GmbH & Co. KG will be described below.

The size of the processed data volume depends largely on the specific framework conditions and requirements. Since the CMS is a flexible and scalable product, only target values can be given below.

A total of up to 748 Modbus registers are available as clients.

The Modbus/TCP data is updated with a minimum cycle of 20 ms. In this cycle, mainly digital input and output data of the CMS is updated, as this data has especially high real-time requirements. Data with lower real-time requirements, such as actuator or CO controller data, is only updated every 200 ms.

That is why it is advisable to maintain Modbus TCP/IP cycle times of at least 200 ms or a multiple thereof for queries by a Modbus master, as this corresponds to a complete CMS system cycle and ensures that the CMS data is fully updated.

The performance of the system depends on the volume of data transferred (number of Modbus registers queried), the cycle time of the queries as well as the number of Modbus bus masters querying simultaneously. These parameters influence the maximum computing time available to the CMS to respond to these requests. If the maximum performance limit is exceeded, individual queries can no longer be processed within the desired cycle time and exceed the response time or are discarded.

Table 1 provides an overview of the performance limits for different request cycles by Modbus masters as a multiple of a CMS system cycle.

Number of masters	Number of registers / masters	Request cycle [ms]
1	<=125	20
1	ALL	200
2	<=125	40
2	400	200
2	ALL	400
4	<=125	80
4	200	200
4	ALL	600

Table 1: Modbus TCP/IP performance limit of the CMS

2.2.5 Storage locations and duration of storage

The data is stored in RAM in the CMS in the MCC component and is used during operation for internal processing purposes for the intended function of the device. This data is deleted after operation has ended.

This does not include information that documents the history of the device, such as error histories (the last faults, including additional detailed information), operating hours and the number of burner start-up processes. This data is permanently stored in the device EEPROM and can also be retrieved through the interfaces.

2.3 Associated service data

When using the device, associated service data (e.g. from software, apps or diagnostic tools interacting with the device) may be generated. LAMTEC GmbH & Co. KG itself offers the following tools and apps that can generate associated service data. For connected services from third parties authorised by the user, detailed information is provided by the respective service owners.

2.3.1 PC service software data

The PC service software is used for configuration, commissioning, and servicing of the product. The PC service software is not required during regular operation. User data is never automatically transmitted to LAMTEC GmbH & Co. KG.

During commissioning, configuration or servicing, the PC service software can be connected through the Ethernet interfaces of the CMS (MCC) and reads all data and parameters. These can be visualised or modified in the software, depending on the user authorisation with passwords and approval levels of the CMS and the PC service software itself.

In some cases, data and associated service data are temporarily stored locally in order to display trend diagrams and other trend-based information. This data is deleted after the PC service software is closed.

Datasets containing selected (selective dataset) or all CMS parameters can be read from the device by the user with the PC service software and saved as a file. Depending on permissions, parameters can be written back to the CMS using datasets. The datasets can be saved by the user to any storage location and can also be deleted by the user there.

2.3.2 NBM and Visiocontrol 4.0 data

The NBM is used for secure data connection with the Visiocontrol 4.0 (VC 4.0) product. Selected CMS product data is exchanged with a cloud platform using point-to-point communication in order to visualise and store it in the Visiocontrol 4.0 cloud application and to provide additional intelligent connected services, such as predictive maintenance functions. This may result in associated service data, depending on the use and configuration of the VC 4.0 product.

Additional information regarding the EU Data Act on NBM and Visiocontrol 4.0 will be published separately for the product by LAMTEC GmbH & Co. KG and can be requested from our support team (support@lamtec.de).

2.3.3 Service and operating app

The LAMTEC GmbH & Co. KG apps for service and operation enable users to store product data for visualisation and service requests (support tickets), as well as for their own use (snapshots), in a remote database as well as locally. Comprehensive user and authentication management prevents the unintentional disclosure of product data to third parties. The data is stored in accordance with the GDPR.

The product data must be transmitted to the apps either by the user or by an authorised person. The product data can be collected manually or scanned from the device display using a QR code. All collected data can be displayed locally in the app and can be edited

and deleted locally. Additional information, such as error descriptions, documents, images or videos, can be added by the user.

The collected product data and all additional information are stored in a remote, central database after a support request has been submitted. In addition to the user, the assigned service partner (OEM) and, subject to a separate agreement, LAMTEC GmbH & Co. KG also have access to the data for the purpose of processing support cases, improving products and creating generalised and anonymised solution proposals (public solutions) for other users of the LAMTEC support app.

Both the collection and subsequent transmission of product data through the database to the manufacturer or service partner require the active participation of the user, who has been informed of this in advance when registering with the LAMTEC support app and has given their consent.

By performing these actions, the user is deemed to have given their consent to the storage and processing of the data by LAMTEC GmbH & Co. KG or the respective service partner. If the user does not agree to this, the LAMTEC support app may not be used.

The user can delete all images, videos, documents and product data downloaded locally within the app, or the entire account, in the LAMTEC support app.

Each user can view all of their local and sent data in the support app under the individual account and transmit support ticket entries to other applications using copy and paste.

On request to LAMTEC support (support@lamtec.de), all data sent in connection with the user can also be deleted from the remote database by LAMTEC GmbH & Co. KG.

3 Right to complain to the supervisory authority

If you believe that your rights under the Data Act have been violated, you also have the right to complain to the competent supervisory authority (in accordance with the Data Act).

Contact details of the responsible public authority:

Federal Network Agency for Electricity, Gas, Telecommunications, Post and Railways
Tulpenfeld 4

53113 Bonn

Telephone: 0228 14-0

Fax: 0228 14-8872

E-mail: info@bnetza.de

4 Right to lodge a complaint under data protection law

Irrespective of this, you have the right to lodge a complaint with the supervisory authority responsible for data protection in accordance with Art. 77 GDPR. Information and contact:

<https://www.lamtec.de/datenschutz>

5 Information about trade secrets

The data generated by the connected product and service does not contain any data that is subject to trade secret protection.



The information in this publication is subject to technical changes.



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