

ErgoPen Neo / EduPen Neo

Date: 2026-10-19 | Version: 1.2

1. Product with digital elements

Product / service	ErgoPen Neo and EduPen Neo: digital pens with pressure and motion sensors, associated apps (Android/iOS) and server services (usage data, backups)
Manufacturer / provider	STABILO International GmbH, Schwanweg 1, 90562 Heroldsberg, Germany
Contact (general)	Data protection: datenschutz@schwan-stabilo.com / Reports and requests: form at https://www.stabilo.com/com/data-act-cra/#nav-formular

2. Support period and security updates

- **Support period:** Security updates at least until 12/2032. As long as the product is being sold, we review this date annually and extend it where appropriate; an end date that has already been stated will not be shortened. Applies to the pen firmware, the current version of the apps and the server services.
- **Type of security support:** security updates for the apps; firmware updates for the pens; security updates and configuration changes to the server services (hosted in Germany).
- **Update mechanism:** App updates via the Apple App Store or Google Play – automatic if automatic updates are enabled in the device/store settings (where they can also be disabled). Pen firmware updates are provided via the respective app and transferred to the pen via Bluetooth. As the apps work without a permanent internet connection, updates are only downloaded when the tablet is online – please connect regularly. Server-side updates are applied centrally without any action by users.
- **Note:** Each security update remains available for at least 10 years after its release or for the remainder of the support period, whichever is longer.

3. Single point of contact for vulnerabilities

Vulnerability contact	Form at https://www.stabilo.com/com/data-act-cra/#nav-formular
CVD policy URL	https://www.stabilo.com/com/data-act-cra/
Optional: PGP key	Not currently offered

4. Coordinated vulnerability disclosure (CVD) – brief process

- **How to report:** via the form at <https://www.stabilo.com/com/data-act-cra/#nav-formular>; please state the product and version. No user account is required; an email address is only needed for follow-up questions and feedback. Please do not report vulnerabilities via general support channels, social media or app store reviews.
- **What to include:** product (ErgoPen Neo or EduPen Neo), app version, tablet model and operating system version, pen firmware version, description of the vulnerability, possible impact, proof of concept or steps to reproduce (if possible), log excerpts without unnecessary personal data.
- **Feedback:** If an email address was provided: acknowledgement of receipt within 2 working days, initial assessment within 10 working days, followed by regular status updates until the issue is resolved.
- **Responsible disclosure:** We ask you to coordinate the timing of any publication with STABILO. The full rules, including our commitment to reporters, are available at <https://www.stabilo.com/com/data-act-cra/>. Please test only with your own accounts and devices, do not access other users' data and do not disrupt operations.
- **Reporting obligations:** STABILO reports actively exploited vulnerabilities and severe security incidents to the competent CSIRT and to ENISA in accordance with Art. 14 CRA and informs affected users.

5. Information and secure use

- **Secure installation and operation:** Install the apps only from the Apple App Store or Google Play. EduPen Neo: Android 11+ or iOS 15.0+. ErgoPen Neo: Android 10+ or iOS 13+, recommended Android 11+ or iOS 15.0+ – for security reasons, use an operating system version that still receives security updates. Bluetooth must be enabled. Protect tablets with a screen lock and use them only within the institution. The accounts are pseudonymous: keep the user ID and backup ID safe, as they are needed for recovery and data protection requests.
- **Configuration:** With EduPen Neo, no personal data is transmitted externally by default. Pseudonymised usage analytics to improve the app (including the device serial number for support purposes) are optional and must be actively switched on. Keep automatic app updates enabled (recommended).
- **Logging/diagnostics:** For support we need the user or backup ID, app version, tablet model and operating system version, pen serial number, and the time and description of the error. Please do not send names or findings of children or patients.
- **Intended use:** EduPen Neo helps teachers diagnose and support handwriting in schools; ErgoPen Neo is used for the objective assessment of writing and graphomotor skills in occupational therapy. Both products are operated by professionals; data of children or patients is recorded.
- **Secure decommissioning:** Before passing on or disposing of the tablet, delete the app data or reset the device. Deletion of server-side data and backups can be requested by stating the user or backup ID via the form at <https://www.stabilo.com/com/data-act-cra/#nav-formular> or at datenschutz@schwan-stabilo.com. Dispose of the pen at collection points in accordance with the WEEE Directive.

6. EU declaration of conformity

- **EU Declaration of Conformity:** ErgoPen Neo and EduPen Neo (joint declaration): <https://www.stabilo.com/com/declaration-of-conformity/>.
- **CE marking:** ErgoPen Neo and EduPen Neo bear the CE marking (see the EU declaration of conformity above).

7. Publication

- **Product page / checkout:** EduPen Neo: <https://www.stabilo.com/de/digitaler-stift-mit-app-fuer-den-schreibunterricht-stabilo-edupen-neo/1808-41-1> and ErgoPen Neo: <https://www.stabilo.com/de/digitaler-stift-mit-app-fuer-die-ergotherapie-stabilo-ergopen-neo/1808-41-2> – each with a section “Cybersecurity & Support” including the support period
- **In-app:** Settings → “Security & Support” with vulnerability contact, link to the CVD policy and support period (in preparation).
- **Support page:** “Security, Support and Data Access” page at <https://www.stabilo.com/com/data-act-cra/> with one section per product; this document is versioned (date/version in the header).

8. EU Data Act (Regulation (EU) 2023/2854) – Access to product data

- **Applicability:** EduPen Neo and ErgoPen Neo are connected products. The users’ right of access to the generated data also applies to devices already sold; the obligation to provide data access “by design” (Art. 3(1)) applies to devices placed on the market from 12 September 2026.
- **Data holder:** STABILO International GmbH.
- **Generated data:** sensor data of the pens (writing pressure at the tip, grip pressure, motion data, angle). They are generated continuously in real time while writing and transmitted to the app via Bluetooth. The test results derived from them are stored; reports are calculated from the test results when needed and are not stored.
- **Storage:** Data is stored locally on the tablet; usage data and backups on servers in Germany. The pen does not store any data locally. Local data remains on the tablet until it is deleted there, e.g. by uninstalling the app. Usage data and backups on the server are stored for the duration of active use. After 3 years without use, an account is considered inactive; the associated usage data and backups are then deleted unless statutory retention obligations apply. Advance notification is not possible because no email addresses are stored. Deletion can be requested at any time by stating the user or backup ID via the form at <https://www.stabilo.com/com/data-act-cra/#nav-formular> or at datenschutz@schwan-stabilo.com; it takes place within 30 days.
- **Identification:** As the accounts are pseudonymous, the user or backup ID must be stated in requests.
- **Format and volume:** The stored test results are provided as a ZIP file containing an SQLite database; reports and other analyses are not included. Volume: typically less than 100 kB per backup, at most 2 MB in 95 % of cases, up to around 20 MB in individual cases.
- **Use of the data by STABILO:** to provide the app functions, for error analysis and for secure operation. With EduPen Neo, pseudonymised usage analytics to improve the app are also transmitted (including the device serial number for support purposes) – only if they have been actively switched on. The data is not used for advertising or profiling.

- **Use by third parties:** Third parties do not receive the data for their own purposes. STABILO operates the server services on servers of the Open Telekom Cloud (Deutsche Telekom) in Germany; service providers process data exclusively on behalf of STABILO (Art. 28 GDPR).
- **Trade secrets:** The test results provided do not contain any trade secrets of STABILO.
- **Duration and termination:** Licence: The one-off licence is unlimited in time; the apps also work without an internet connection. Associated server services (backups, optional usage analytics): provided until the end of the support period (at least 12/2032). Data deletion: A request to delete the server-side data does not terminate the licence.
- **Access and sharing:** Requests via the form at <https://www.stabilo.com/com/data-act-cra/#nav-formular>. The data is provided free of charge in a structured, commonly used and machine-readable format and, on request, shared with a third party where legally permitted. Personal data is only shared where there is a valid legal basis under the GDPR. Rights under the GDPR, e.g. the right of access, remain unaffected and can also be exercised at datenschutz@schwan-stabilo.com.
- **Pre-contractual information:** available before the conclusion of a contract at <https://www.stabilo.com/com/data-act-cra/>.
- **Right to lodge a complaint:** Users can lodge a complaint with the authority competent under Art. 37 Data Act (in Germany presumably the Federal Network Agency, Bundesnetzagentur); where personal data is concerned, also with the competent data protection supervisory authority.