

KATHY System with LUNIS Ink (handwriting recognition, including integration in phase6 and cabuu)

Date: 2026-10-19 | Version: 1.2

1. Product with digital elements

Product / service	LUNIS Ink (digital ballpoint pen with motion and pressure sensors) and KATHY System: Kathy SDK (software library for partner apps on Android, iOS, Unity and web) and Kathy Server (server-side handwriting recognition, hosted in Germany)
Manufacturer / provider	STABILO International GmbH, Schwanweg 1, 90562 Heroldsberg, Germany (manufacturer of LUNIS Ink, Kathy SDK and Kathy Server). phase6 and cabuu are independent providers of their apps and are themselves responsible for them.
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 LUNIS Ink firmware, the current version of the Kathy SDK and the Kathy Server.
- **Type of security support:** firmware updates for LUNIS Ink; new versions of the Kathy SDK with security fixes, made available to partners via the package sources provided (including the npm package @stabilo/kathy-lib); security updates and configuration changes to the Kathy Server and the recognition service.
- **Update mechanism:** LUNIS Ink firmware updates are offered wirelessly via the connected app or the browser version and installed after confirmation by the user. Partners integrate SDK updates into their apps; end users receive them via app updates in the Apple App Store or Google Play. Server-side updates are applied centrally by STABILO without any action by users and are tested in a test environment before going live.
- **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:** affected component (LUNIS Ink, Kathy SDK or Kathy Server), Kathy SDK version and platform (Android, iOS, Unity, web), partner app and its version, LUNIS Ink 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.
- **Partner apps:** Please report vulnerabilities that only affect the phase6 or cabuu app directly to the respective provider. If the Kathy SDK or LUNIS Ink is affected, STABILO coordinates the fix with the partners.
- **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 (end users):** Install the partner app only from the Apple App Store or Google Play; iOS 15.0+ or Android 11+ is required. The Bluetooth permission is needed to connect the pen. Please do not write health data, access credentials or passwords with the pen.
- **Secure integration (partners/developers):** always use the current Kathy SDK version and ship security updates promptly; keep access credentials for the Kathy Server confidential and do not store them in source code repositories; store the writer ID securely in the app; operate the web version only via HTTPS (supports Chromium-based browsers only).
- **Configuration:** Individual adaptation of the recognition to your own handwriting is optional. Pair the pen only with your own device and keep automatic app updates enabled (recommended).
- **Logging/diagnostics:** For operation and error analysis, the KATHY System processes the IP address, the pen's serial number and hardware and firmware version, the app name and version, device information, the pseudonymous writer ID generated by the KATHY System as well as the recognition configuration, recognition results and confidence values. Raw sensor data is stored for a maximum of 90 days. For support we need these version details, the partner app, and the time and description of the error – please do not send handwritten content or third-party data.
- **Intended use:** handwritten input (e.g. vocabulary) with LUNIS Ink on paper; the sensor data is transmitted to the partner app via Bluetooth and converted into text on the Kathy Server. The target group is learners in grades 5–13, i.e. mostly minors. Without an internet connection, only the pen connection and gesture recognition work.

- **Secure decommissioning:** Remove the pen pairing in the Bluetooth settings and uninstall the app. Deletion of the data stored in the KATHY System can be requested at any time via the form at <https://www.stabilo.com/com/data-act-cra/#nav-formular> or at datenschutz@schwan-stabilo.com. Raw sensor data is deleted or anonymised after 90 days at the latest, pseudonymised training data after 3 years, unless further storage is necessary.

6. EU declaration of conformity

- **EU Declaration of Conformity:** LUNIS Ink (joint declaration for LUNIS ink and LUNIS graph): <https://www.stabilo.com/com/declaration-of-conformity/>.
- **CE marking:** LUNIS Ink bears the CE marking as an electronic product.

7. Publication

- **Product page / checkout:** <https://www.stabilo.com/de/smarter-kugelschreiber-stabilo-lunis-ink/1809-1-1> – section “Cybersecurity & Support” including the support period
- **In-app:** in the partner apps phase6 and cabuu → “Security & Support” with vulnerability contact, link to the CVD policy and support period (in coordination with the partners).
- **Developers:** publish security advisories in the changelog and documentation of the Kathy SDK.
- **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:** LUNIS Ink is a connected product.
- **Data holder:** STABILO International GmbH.
- **Generated data:** sensor data at 100 Hz (acceleration X/Y/Z, angular rate X/Y/Z, tip pressure, counter and timestamp); recording metadata (pseudonymous writer ID, handedness, year of birth, recording type); device and app data (serial number, hardware and firmware version of the pen, app name and version, device information); connection data (IP address). The sensor data is generated continuously in real time while writing.
- **Storage:** Raw sensor data and connection data are stored for a maximum of 90 days and then deleted or anonymised; individual model data for as long as the product is actively used. The pen does not store any data locally.
- **Identification:** To assign the data, we ask for the partner app used and the serial number of the pen.
- **Format and volume:** The raw sensor data and metadata of the last 90 days are provided, mainly in Protobuf format, partly in JSON; around 20 MB per hour of writing (e.g. 1.6 MB for 5 minutes, 39 MB for 2 hours). Recognition results, confidence values and individual recognition models are derived data and are not included.
- **Use of the data by STABILO:** to provide handwriting recognition and transmit the results to the partner app, to adapt recognition to the individual handwriting, to train and maintain the general recognition model using pseudonymised data, for error analysis, to ensure security, to detect misuse and to comply with legal obligations. The data is not used for advertising, profiling or the sale of user data.

- **Partner apps:** phase6 and cabuu are independent providers of their apps. They receive the recognition results and process them under their own responsibility in accordance with their own privacy notices.
- **Service providers:** Kinemic GmbH, Karlsruhe, supports STABILO in providing, maintaining and adapting handwriting recognition and in training the general recognition model; for this purpose it receives only pseudonymised data without serial number, device information or the original writer ID and acts on behalf of STABILO (Art. 28 GDPR). The servers run in the Open Telekom Cloud (Deutsche Telekom) in Germany. The data is not shared with third parties for their own purposes.
- **Trade secrets:** The raw sensor data and metadata provided do not contain any trade secrets of STABILO.
- **Duration and termination:** The service is provided for the duration of use. It ends with the deletion of the writer ID or of the account in the partner app; deletion of the data stored in the KATHY System can be requested at any time via the form at <https://www.stabilo.com/com/data-act-cra/#nav-formular> or at datenschutz@schwan-stabilo.com.
- **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.