

STABILO BOLLY (with LUNIS graph)

Date: 2026-10-19 | Version: 1.2

1. Product with digital elements

Product / service	STABILO BOLLY: learn-to-write app (iOS/Android) with the LUNIS graph digital pencil and the associated server services (BOLLY Server for game progress and cross-device synchronisation, STABILO Account)
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 current version of the BOLLY app, the LUNIS graph firmware and the associated server services.
- **Type of security support:** security updates for the BOLLY app, firmware updates for the LUNIS graph, and security updates and configuration changes to the server services operated by STABILO 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). Firmware updates for the LUNIS graph are offered wirelessly via the connected app and installed after confirmation by the user. Server-side updates are applied centrally by STABILO without any action by users. An occasional internet connection is required for updates.
- **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:** app version, device and operating system version, LUNIS graph firmware version (if affected), 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 app only from the Apple App Store or Google Play; iOS 15.0+ or Android 11+ is required. The Bluetooth permission is only needed to connect to the pencil. A STABILO Account is required for synchronisation; sign-in takes place in the device's system browser, not within the app. Use a unique, secure password for the STABILO Account and keep the operating system up to date.
- **Configuration:** Keep automatic app updates enabled (recommended) and install pencil firmware updates promptly. The Bluetooth permission can be revoked in the system settings; without it, the pencil cannot connect. Up to 4 child profiles are possible per account.
- **Logging/diagnostics:** For support we need the app version, device and operating system version, pencil firmware version, the STABILO Account user name, and the time and description of the error – no passwords.
- **Intended use:** learning app for children aged about 5 to 8 that accompanies learning to write on paper with the LUNIS graph. Setup and account management are carried out by parents.
- **Secure decommissioning:** Uninstall the app and remove the pencil pairing in the Bluetooth settings. The STABILO Account can be deleted directly in the account management at any time. Alternatively, deletion 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. Accounts without login or use are considered inactive after 3 years; following a notification 30 days in advance, they are deleted unless reactivated (subject to statutory retention obligations).

6. EU declaration of conformity

- **EU Declaration of Conformity:** LUNIS graph (joint declaration for LUNIS ink and LUNIS graph): <https://www.stabilo.com/com/declaration-of-conformity/>.

- **CE marking:** The LUNIS graph bears the CE marking (product/packaging).

7. Publication

- **Product page / checkout:** <https://www.stabilo.com/de/lunis-graph-bolly> – section “Cybersecurity & Support” including the support period.
- **In-app:** parents’ area → “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:** The LUNIS graph is a connected product.
- **Data holder:** STABILO International GmbH.
- **Generated data:** motion and sensor data of the LUNIS graph (acceleration, angular rate, tip pressure). They are generated continuously in real time while writing, transmitted to the app via Bluetooth and processed there only for immediate feedback; they are neither stored nor transmitted to STABILO and are therefore not available for disclosure. Learning progress and game progress are values calculated in the app (e.g. points and progress) and not product data generated by the pencil.
- **Storage:** The sensor data is processed in the app only for immediate feedback, not stored and not transmitted to STABILO. The pencil itself does not store any data. Learning progress and game progress are stored; they are synchronised via the BOLLY Server in Germany and deleted in accordance with the rules of the STABILO Account (deletion of the account or 3 years without use).
- **Format and volume:** On request, we nevertheless provide learning progress and game progress in JSON format (typically around 150 kB per user, at most around 1 MB); this does not constitute a claim under the Data Act. Rights under the GDPR, e.g. to access and data portability, remain unaffected.
- **Use of the data by STABILO:** exclusively to provide the learning and practice functions, to store and display learning progress, to synchronise between devices, for error analysis, for IT security and for the technical provision and improvement of these functions. 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 data provided on request (learning progress and game progress) does not contain any trade secrets of STABILO.
- **Duration and termination:** The service is provided for the duration of use. It ends when the STABILO Account is deleted (directly in the account management or on request) or when the account is deleted after 3 years without use.

- **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.