

# xSUMO Data Collection Disclosure

## Overview

xSUMO is VicOne's Vehicle Over-The-Air (OTA) update management platform. To deliver firmware update services to vehicles at scale, xSUMO collects and processes the data summarized below.

Data collection falls into two categories:

- **Default Collection:** required for core platform functions and cannot be turned off while xSUMO is in use.
- **Configurable Features:** optional data collection that administrators can enable or disable based on operational needs.

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## Account & Console Access

### Default Collection

User account and authentication data, multi-factor authentication information, login activity, role and permission assignments, and administrator audit records. These are used to verify user identity, manage secure access, and maintain accountability for platform operations.

### Configurable Features

Email notifications (account activation, password reset, and security alerts) using recipient email address and display name.

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## Vehicle Fleet Management

### Default Collection

Vehicle Identification Number (VIN), vehicle and ECU model information, and installed firmware versions. This information identifies managed vehicles and ensures updates are targeted to the correct hardware.

### Configurable Features

- **Vehicle diagnostic logs:** in-vehicle diagnostic data used to troubleshoot OTA update issues. Can be enabled or disabled per vehicle.

- **Fleet geolocation:** approximate geographic distribution derived from IP addresses using a locally hosted database. No data is sent to external geolocation services.
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## Firmware & Update Package Management

### Default Collection

Firmware and update package metadata, including version, file information, integrity checksums, signature information, and approval history. This metadata is used to track firmware throughout its lifecycle and verify package integrity.

### Configurable Features

Firmware binary files and update packages can be stored in cloud object storage for scalable distribution, or in database-integrated storage for self-hosted deployments.

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## OTA Update Campaigns

### Default Collection

Campaign and schedule configuration, target vehicle lists, deployment time windows, and per-vehicle deployment status. This information is used to plan firmware rollouts and monitor staged deployment progress.

### Configurable Features

Push notifications to vehicles using VIN and schedule identifier, delivered via standard messaging protocols to inform vehicles of available updates.

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## Update Event Telemetry

### Default Collection

Per-vehicle update progress events (such as downloading, installed, or failed), aggregated success and failure metrics, and fleet firmware version distribution. These data points enable real-time monitoring of rollout progress and adoption rates.

### Configurable Features

Failure alert emails sent to designated operators when an OTA update fails, supporting rapid incident response.

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## Vehicle Client Log Collection

This feature is entirely opt-in and must be explicitly enabled per vehicle. When enabled, xSUMO collects vehicle-side OTA logs (VIN, log module, log content, and timestamps) for post-incident debugging only.

## Data Security

xSUMO protects collected data through the following measures:

- All data in transit is encrypted using industry-standard TLS.
- User passwords are cryptographically hashed and never stored in plaintext.
- Authentication tokens are digitally signed using managed cryptographic keys.
- Firmware integrity is verified through cryptographic checksums and optional digital signatures.
- Audit records are stored as tamper-resistant entries that cannot be modified after creation.
- In multi-tenant deployments, each organization's data is logically isolated, and users can only access data belonging to their own organization.

## External Services

xSUMO relies on trusted cloud services for file storage, email delivery, key management, internal event streaming, and OTA notification delivery. All communications with these services are encrypted in transit. No customer data is shared with third parties for advertising or marketing purposes.

## Data Controller & Privacy Contact

VicOne processes data as described above as data processor on behalf of its customers, on the basis of contract performance (Art. 6(1)(b)) and/or legitimate interests (Art. 6(1)(f)). For privacy inquiries or to exercise your data subject rights, contact [gdpr@vicone.com](mailto:gdpr@vicone.com). You also have the right to lodge a complaint with your local data protection authority.