Information for related services pursuant to Article 3 (3) of the Data Act

YASKAWA Europe GmbH – Robotics Division · OPC-UA

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This information serves to fulfil the information obligations for related services under Article 3 (3) of the Data Act.

"Data Act" means Regulation (EU) 2023/2854 of the European Parliament and of the Council of 13 December 2023 on harmonised rules on fair access to and use of data and amending Regulation (EU) 2017/2394 and Directive (EU) 2020/1828 (Data Act).

"Product Data" means data generated by the use of a connected product that the manufacturer designed to be retrievable, via an electronic communications service, physical connection or on-device access, by a user, data holder or a third party, including, where relevant, the manufacturer.

"Readily Available Data" means Product Data and Related Service Data that a data holder lawfully obtains or can lawfully obtain from the connected product or related service, without disproportionate effort going beyond a simple operation.

"Related Service Data" means data representing the digitisation of user actions or of events related to the connected product, recorded intentionally by the user or generated as a by-product of the user's action during the provision of a related service by the provider.

Name of related service: OPC-UA (Open Platform Communications – Unified Architecture) is an optional, vendor-independent communication service of the Yaskawa Motoman controllers. The controller provides an OPC-UA server via which higher-level systems (PLC, MES, SCADA, control systems) can access robot data as clients in a structured and machine-readable manner.

Connected product: Yaskawa industrial robots of the Motoman series with a YRC1000, YRC1000micro or DX200 robot controller, by YASKAWA Europe GmbH, Robotics Division, Yaskawastr. 1, 85391 Allershausen, Germany

Prospective data holder: YASKAWA Europe GmbH, Robotics Division, Yaskawastr. 1, 85391 Allershausen, Germany

Contact details of the prospective data holder: robotics@yaskawa.eu, phone +49 8166-90-0

Product Data

What is the nature, estimated volume and collection frequency of the Product Data that the prospective data holder is expected to obtain?

Nature of Product Data:

- Product or service status data, e.g. operating state, operating mode, active job, program status, robot position, axis positions, variable values, register values, system variables, current alarms as well as error messages
- Data relating to the user's environment, e.g. values of connected sensors; only insofar as made available as variables
- General environmental data, e.g. measured values of optional environmental sensors; only insofar as made available as variables

The categories and examples are taken from the information sheet for the connected product “Robot Controllers FS100, DX200, YRC1000, YRC1000micro”, which lists all types of Product Data in full.

Estimated volume of Product Data:

- OPC-UA server (optional): a few bytes to a few hundred bytes per value read or subscribed, up to several kilobytes per request or notification; with many subscribed variables and short publishing intervals, several megabytes per day or more.

Frequency of Product Data collection:

Cyclically (subscription-based), event-driven (value change) or on demand through client queries.

How can the user access and retrieve the Product Data?

The user can access and retrieve the Product Data by establishing a connection to the OPC-UA server of the robot controller via OPC-UA clients (e.g. SCADA, MES, industrial PC applications) and reading or writing data via the standardised address space model.

How and for how long is the Product Data stored and retained?

The robot controller stores Product Data exclusively on the device; Product Data is not stored on a remote server of YASKAWA. In detail:

- Program, variable, parameter and configuration data (e.g. jobs, variables, system parameters, calibration data) is retained in the non-volatile memory of the controller until the user changes, deletes or overwrites it.
- Alarm, event and log data is stored in a ring buffer of limited size; older entries are overwritten by newer ones. The retention period therefore depends on the volume of data generated.
- Usage data (e.g. power-on, servo-on and motion time, operating time per application) is recorded continuously in the controller.
- Status, motion and input/output data as well as the contents of communication telegrams are transient data: this data is collected only during use, processed in the controller and continuously overwritten, but not stored permanently.

The user can transfer Product Data, or have it transferred automatically, to external storage media or connected systems (e.g. industrial PC, server, PLC); there, the user determines the storage location and retention period.

Related Service Data

What is the nature and estimated volume of the Related Service Data to be generated?

Nature of Related Service Data:

- Service status data (e.g. OPC-UA server status, configuration, security policies, session information, diagnostic messages)
- Customer usage data (e.g. client connections, session duration, nodes and subscriptions used)
- Communication data (e.g. connection establishment and termination, data transfers, subscription parameters)

Estimated volume of Related Service Data:

The volume of the Related Service Data is a few kilobytes per session. The file size depends on various factors, but can be up to several megabytes per day when logging is enabled.

How can the user access and retrieve the Related Service Data?

The user can access and retrieve the Related Service Data via:

- the diagnostic functions of the OPC-UA server
- system logs of the controller
- external monitoring tools

How and for how long is the Related Service Data stored and retained?

The Related Service Data is stored on the device and, where applicable and insofar as logging is enabled, on systems operated by the user, and is retained for the duration of the respective configuration.

Does the prospective data holder expect to use Readily Available Data itself? If so, for what purposes will this data be used? Does the prospective data holder intend to allow one or more third parties to use the data for purposes agreed upon with the user?

As things currently stand, the prospective data holder does not expect to use Readily Available Data from OPC-UA itself, as in normal operation this data is exchanged exclusively locally between the user's computer and the controller in the user's network and is not transmitted to YASKAWA.

The prospective data holder does not intend to allow third parties to use this data for purposes agreed upon with the user, as no such data becomes accessible to it in normal operation.

How can the user request that the data be shared with a third party and, where applicable, how can the user end the data sharing?

In normal operation, no data from OPC-UA becomes accessible to the prospective data holder (YASKAWA). In this respect, the de facto data holder is the user, in whose network the data remains. A separate procedure for requests to YASKAWA to share data is therefore not provided. Control over sharing data with third parties lies with the user.

Does the user have a right to lodge a complaint alleging an infringement of any of the provisions of Chapter II of the Data Act?

Without prejudice to any other administrative or judicial remedy, the user may lodge a complaint with the competent authority within the meaning of Article 37 of the Data Act in the Member State of their habitual residence, place of work or establishment if they consider that their rights under Chapter II of the Data Act have been infringed.

Each Member State has designated one or more competent authorities.

In the Federal Republic of Germany, the competent authority within the meaning of Article 37 of the Data Act is the Federal Network Agency (Bundesnetzagentur, BNetzA). Current contact information can be found at https://www.bundesnetzagentur.de.

Is the prospective data holder the holder of trade secrets contained in the data accessible from the connected product or generated during the provision of a related service?

No. As things currently stand, the data accessible via or generated by OPC-UA does not contain any trade secrets of the prospective data holder.

Is a third party the holder of such trade secrets and, if so, who?

Third parties that may be concerned are machine manufacturers or integrators whose application and process know-how (e.g. paths, cycle logic, application-specific parameters) may be contained in the data. Disclosure of such data to third parties is subject to the protective measures under Article 5 (9) to (11) of the Data Act. Whether trade secrets of third parties are affected in a specific case is determined in connection with the respective data access request.

What is the duration of the contract between the user and the prospective data holder, and how can the contract be terminated?

The duration of the contract for the provision of the related service is specified in the purchase or service contract or in the applicable licence and terms of use for OPC-UA. The contract may be terminated in particular by exercising a statutory or, where applicable, contractual right of termination, as well as by deactivating the service.