

Data Act Information about connected products by Comacchio S.p.A.

In the following, we as Comacchio S.p.A. (hereinafter "Comacchio" or "we" or "us") inform you in accordance with Art. 3 Para. 2 Data Act (Regulation (EU) 2023/2854) about the product data that is generated through the use of a Comacchio drilling rig of the lines CH, GEO, MC, MC-E, MC-T, CA, CA-T, CX, and CX-T equipped with the Comacchio ComNect telemetry system (hereinafter "product", "connected drilling rig" or "rig"), consisting of a specific telemetry apparatus, including sensors, a display with matching control unit, a modem as well as other components that are connected to the control unit and communicate with it.

1. Product data

1.1. Type, estimated scope and frequency of collection of product data

Product data may be generated when using a Comacchio connected drilling rig. The types of data collected by the system are:

- Location data
- Engine data
- Errors and diagnostic codes
- Hydraulic and electric data
- System states
- Working modes
- Technology data

A Comacchio connected drilling rig is capable of generating data continuously and in real time using the SAE J1939, CANopen or RAW CAN communication protocols. Real-time data from the different electronic devices installed on the rig ensures the functionality of the equipment and of the related connected services.

The steady flow of data is sampled at predefined time intervals and interpreted to determine the value of specific variables, which are stored in binary, SQLite, TXT, CSV and GMX formats. Some of these files are used for configuration, security and safety purposes and are, therefore, not available to the user.

Comacchio S.p.A.

Via Callalta, 24/B
31039 Riese Pio X (TV) Italy
T. +39 0423 7585
F. +39 0423 755592

P.IVA - Cod. Fis. - Iscr.Reg.Impr. IT 02019450267
R.E.A. TV n. 184314
Capitale Sociale € 12.000.000,00 i.v.



UNI EN ISO 9001:2015 / ISO 14001:2015

The rest of the operative data is provided to the user in common formats. The production data saved in the form of a GMX file can be accessed by changing manually the extension of the file into a zip archive, which consists, in turn, of a series of CSV and XML files.

The files are also available for download in our ComLake IT infrastructure via the dedicated portal at the following link <http://comconnect.comacchio.com>.

Further information on the type, format, and estimated scope of the product data can be found at the following link www.comacchio.com/data-act.

1.2. Storage and duration of retention

A Comacchio connected drilling rig can store product data directly on the machine to support internal system communication and ensure proper functionality of the rig. The onboard storage capacity is limited, and once it reaches its maximum, older data is automatically replaced with the latest data generated by the ComNect telemetry system.

Configuration and firmware files are typically stored permanently, but they are overwritten when newer versions become available.

If the rig's local memory is not fully used, data remains stored indefinitely.

1.3. User access, retrieval and deletion options of product data

A Comacchio connected drilling rig provides access to the product data directly from the display at the rig by means of USB, ethernet and CAN-BUS ports. The predefined port for the client to access data is the USB port, while for service and debugging the ethernet and CAN-BUS ports are preferably used. The user has no possibility to delete product data stored on the rig.

Date: December 15, 2025

Comacchio S.p.A.

Via Callalta, 24/B
31039 Riese Pio X (TV) Italy
T. +39 0423 7585
F. +39 0423 755592

P.IVA - Cod. Fis. - Iscr.Reg.Impr. IT 02019450267
R.E.A. TV n. 184314
Capitale Sociale € 12.000.000,00 i.v.



UNI EN ISO 9001:2015 / ISO 14001:2015