

Speed Kit Insights

Data Protection & Information Security

1. Overview

What is Speed Kit Insights?

Speed Kit Insights is an AI-powered analytics assistant that lets you analyse existing performance data from Speed Kit Real User Monitoring (RUM) directly in a chat.

Instead of manually searching dashboards or creating custom reports, you can simply ask questions in natural language, for example:

- “How has Largest Contentful Paint changed over the past month?”
- “Which pages are slowest for mobile users?”
- “Is there a correlation between load time and bounce rate?”

The AI agent processes these requests, accesses the existing RUM data and delivers relevant analyses in seconds.

Key data protection points:

- Insights does not collect any additional data.
- It uses only the data that Speed Kit already processes as part of Real User Monitoring (RUM).
- The data remains stored in the EU at all times and is analysed there.
- IP addresses are anonymised and additionally protected using cryptographic methods.

Insights is therefore not a new tracking tool, but a convenient analytics layer built on an existing, GDPR-compliant setup.

2. What is measured and what is not?

Speed Kit Insights is based on the RUM data that Speed Kit already processes to analyse website performance.

The data processed includes:

- **Performance metrics:** e.g. Largest Contentful Paint, First Input Delay, Time to First Byte and error rates.
- **Interactions by visitors to your website:** e.g. pages viewed, navigation paths, clicks, scrolling behaviour, device type and browser version.
- **Technical context data:** e.g. screen resolution, operating system and connection type (mobile/Wi-Fi).
- **Randomly generated user and session IDs:** used solely for statistical analysis of sessions, without identifying individuals.
- **Anonymised IP addresses:** IP addresses are truncated and also stored as an HMAC hash with a key that rotates daily. This makes it technically much more difficult to subsequently link them to a specific individual.

In particular, Insights does not:

- Process or use directly identifying data such as names, email addresses or postal addresses.
- Process or use payment or bank account data.
- Process or use the contents of form fields (e.g. contact or checkout forms).
- Create marketing profiles across different websites.

Insights therefore uses technical usage data for performance analysis, not to identify individuals or for marketing tracking.

3. Legal assessment and consent

Speed Kit Insights uses only the RUM data processed as part of the existing use of Speed Kit. No additional data is collected and no new processing purpose is introduced.

The website operator's existing setup therefore determines the assessment under data protection law, particularly how Real User Monitoring and comparable tools are classified.

Typical scenarios:

- **RUM is controlled through a consent banner (consent):**
In this case, the use of Speed Kit Insights falls under the same purpose in the consent banner, as it only analyses data that has already been collected on the basis of consent.
- **RUM relies on legitimate interests:**
In this case, Speed Kit Insights does not change the legal assessment, as no additional data or purposes are introduced. Insights simply provides an additional analytics interface for the same data.

The website operator is responsible for deciding whether to rely on consent or legitimate interests in each specific case. Speed Kit Insights does not change this fundamental decision; it fits into the existing framework.

4. GDPR compliance and information security

Speed Kit Insights is designed to fit seamlessly into Speed Kit's existing, GDPR-compliant data protection framework.

Key points:

- **Processing within the EU**
 - Amazon Web Services in EU regions (e.g. Frankfurt and Dublin) is used to store and process RUM data.
 - Speed Kit Insights runs on Google Cloud Platform in the Eemshaven data centre (the Netherlands).
- **Anonymisation and pseudonymisation**
 - IP addresses are truncated and additionally hashed (HMAC) using a key that rotates daily.
 - User and session IDs are randomly generated.
 - The data is intended for technical performance analysis, not for identifying individuals.
- **Data minimisation**
 - Only data that is technically necessary for performance analysis and website stability is processed.
 - No additional marketing IDs or cross-site tracking mechanisms are introduced.
- **Data processing on behalf of the controller and subprocessors**
 - Speed Kit acts as a processor for the website operator and processes data only in accordance with the operator's instructions.
 - Subprocessors are used for hosting and infrastructure (e.g. AWS, Google Cloud and CDN), with the necessary contractual and technical safeguards agreed with them.
- **Technical and organisational measures (TOMs)**
 - Encrypted transmission (HTTPS/TLS)
 - System access and data access controls
 - Operation in certified data centres
 - Regular security updates, monitoring and logging