

Data Act Declaration of Conformity

Ultimate Products UK Ltd.

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Ultimate Products Europe Ltd.

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This declaration of conformity is issued under the sole responsibility of the manufacturer: Ultimate Products UK Ltd (Ultimate Products). Ultimate Products ensures that data sharing and storage practices comply with applicable EU regulations, including the General Data Protection Regulation (GDPR) and the Data Act. Data is stored securely and is not shared with third parties without the user's explicit consent, except where required by law or in response to public emergencies as defined under EU legislation

Information about your Smart Radiator

We consider it essential that you are fully informed when purchasing a connected device. Accordingly, we have provided a clear and transparent overview of the data your smart radiator collects and retains

Users may access detailed information regarding the types and formats of data generated by their smart radiator or other connected devices through the Tuya IoT Platform (Tuya). This includes the specific function definitions and associated data structures applicable to the device.

For reference to the Tuya Application (app), please consult the official documentation available at the following link:

<https://developer.tuya.com/en/docs/iot/zigbee-temperature-and-humidity-sensor-function-definition?id=K9tp1654imwjp>

What kind of data is collected?

When connected to the internet, smart devices such as smart radiators can generate data continuously in real time. This typically includes sensor-derived measurements and device activity logs.

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The categories of data stored include:

- **Device Metadata:**
Basic information about the smart device, including device name, unique device identifier (ID), online/offline status, activation timestamp, firmware version, and firmware upgrade history.
- **Network Configuration Data:**
Includes Wi-Fi credentials and location permission settings. This data is used solely for local device configuration and is not transmitted to cloud services.
- **Operational Logs and Sensor Data:**
Records of device usage, including sensor readings and configuration commands issued via the Tuya mobile app. For smart radiators, this includes temperature level reports and operational status (e.g., on/off events).

Smart radiators are designed to operate efficiently and securely, generating minimal data—typically less than **50KB per day**. Data is collected in real time to ensure optimal performance and responsiveness. Certain transmissions may be triggered by specific events, such as powering the radiator on/off or connecting the mobile device to Wi-Fi. These mechanisms help maintain functionality while keeping data usage low and predictable.

Further information concerning the Tuya app, including the methods by which personal data is collected and processed, can be found in the Privacy Notice accessible via the official Tuya website (<https://auth.tuya.com/policies/privacy>).

Where is this data stored?

Data generated by smart radiators is stored securely on **Azure cloud servers**. By default, **Device DataPoint (DP)** records are retained for **seven days**. Extended retention is available upon request and may require the purchase of additional cloud storage services.

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How can I view, share, or delete my data?

In accordance with the **EU Data Act**, users have the right to access, retrieve, and export data generated by their connected devices. These rights are facilitated through the **Tuya App**, which offers a secure and user-friendly interface for data management.

Users may:

- Access and Export Data:**
 Users can view and export device data by navigating to the Tuya App's privacy settings. Select the relevant device, preview the data, and export it via email. Email addresses used for export are entered at the user's discretion.
- Delete Data:**
 Users may initiate deletion of their device data at any time by unbinding the device and selecting the "Delete Data" option within the Tuya App. This process ensures that all associated data is permanently removed from Tuya's cloud storage infrastructure.
- Share Data with Third Parties:**
 Users may export their device data and share it with third parties at their discretion. For ongoing data sharing, a formal request must be submitted via customer support by emailing service@tuya.com. All sharing is subject to the user's explicit consent and may be revoked at any time.
- Data Retention:**
 Device usage logs, including sensor data and configuration commands, are retained for a default period of seven days and are automatically deleted thereafter, unless extended storage is requested by the user.

These practices are designed to comply with the Data Act's principles of access by design, fair and transparent data sharing, and user empowerment, while ensuring alignment with the General Data Protection Regulation (GDPR) where personal data is involved

For questions or assistance regarding Tuya's data protection practices, please contact:

- Customer Service:** +1-844-672-5646 or service@tuya.com
- Privacy Office:** privacy@tuya.com

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