

EU Data Act Information regarding THOMSON Computing Connected Products and Related Services

Version 1.0

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1. Introduction

This document is provided by THOMSON Computing in accordance with Regulation (EU) 2023/2854 (Data Act).

The purpose of this document is to provide customers and prospective customers with information regarding:

- the categories of data that may be generated by THOMSON Computing connected products;
- the existence of any related services associated with such products;
- the manner in which users may access such data;
- the collection, storage and processing of such data by THOMSON Computing.

This document applies to THOMSON Computing laptops, desktop computers and related connected products marketed within the European Union.

2. Connected Products

THOMSON Computing products equipped with network connectivity capabilities, including Wi-Fi and/or Ethernet interfaces, may qualify as connected products within the meaning of the EU Data Act.

Examples include:

- Notebook computers
- Desktop computers
- Mini PCs
- All-in-One PCs
- Desktop PCs

3. Categories of Data Generated by the Product

THOMSON Computing devices may generate technical and operational information required for the normal operation of the device.

Examples include:

Category	Examples
Hardware Information	Processor model, memory configuration, storage characteristics

Category	Examples
Battery Information	Charge level, charging status, battery health indicators
Firmware Information	BIOS version, firmware configuration
System Information	Operating system version, installed drivers
Network Information	Network interface status and configuration
Diagnostic Information	Hardware event logs and diagnostic records

Such information is generated locally by the device, operating system, firmware and hardware components.

4. Data Collection by THOMSON Computing

At the date of publication of this document:

- THOMSON Computing products do not contain proprietary telemetry agents designed to automatically transmit device-generated operational data to THOMSON Computing;
- THOMSON Computing does not operate a cloud-based telemetry platform for monitoring customer devices;
- THOMSON Computing does not intentionally collect, receive, aggregate or store device-generated operational data originating from customer devices;
- THOMSON Computing does not maintain a central repository containing operational data generated by customer devices.

Consequently, THOMSON Computing does not possess device-generated operational data originating from customer devices.

5. Personal Data

THOMSON Computing does not intentionally collect personal data from customer devices through proprietary telemetry mechanisms.

Any collection or processing of personal data performed by:

- Microsoft Windows;
- Microsoft services;
- third-party software publishers;
- cloud service providers;

is governed by the respective privacy policies and legal obligations of those providers.

Such activities are outside the scope of THOMSON Computing's connected product operations.

6. Data Storage

Technical and operational information generated by the device may be stored locally by:

- the operating system;
- firmware components;
- hardware subsystems;
- third-party applications installed by the user.

THOMSON Computing does not provide cloud storage services intended to retain such operational data.

7. Related Services

At the date of publication of this document, THOMSON Computing does not provide any related service designed to:

- collect telemetry data from customer devices;
- continuously monitor device activity;
- aggregate operational data generated by connected products;
- provide cloud-based analytics based on device-generated data.

Accordingly, no related service data are collected or maintained by THOMSON Computing.

8. Access to Data

Users may access locally available information generated by their devices through:

- operating system management tools;
- device firmware interfaces;
- hardware diagnostic utilities;
- third-party software solutions.

As THOMSON Computing does not collect or store such information, no additional data access portal is required.

9. Data Sharing with Third Parties

THOMSON Computing does not share device-generated operational data with third parties because such data are not collected or stored by THOMSON Computing.

Accordingly, no data-sharing mechanism is currently required.

10. Support and Repair Activities

During support or repair activities, THOMSON Computing may receive technical information voluntarily provided by the customer for diagnostic purposes.

Such information is collected exclusively for the purpose of troubleshooting, warranty assessment, repair services or customer support.

This information is not collected automatically by the device and is not considered part of any telemetry or connected service operated by THOMSON Computing.

Data provided during support interactions are processed in accordance with applicable contractual, warranty and privacy obligations.

11. Contact Information

For questions related to this document or requests concerning the EU Data Act, users may contact:

Metavisio SA - THOMSON Computing
157 Rue du Caporal Felix Poussineau
77190 Dammarie-les-Lys

Annex A

Statement Regarding Device Telemetry

THOMSON Computing confirms that, at the date of publication of this document:

1. No proprietary telemetry agent is pre-installed for the purpose of transmitting operational device data to THOMSON Computing.
2. No automatic transfer of device-generated operational data to THOMSON Computing servers is performed.
3. No cloud-based device telemetry platform is operated by THOMSON Computing.
4. No centralized repository of device-generated operational data is maintained by THOMSON Computing.
5. No device-generated operational data are sold, licensed, transferred or otherwise made available to third parties by THOMSON Computing.
6. Any data generated, collected or processed by operating systems, software publishers, hardware manufacturers or cloud service providers remain under the responsibility of those respective entities.
7. Consequently, THOMSON Computing does not possess device-generated operational data that could be disclosed pursuant to a Data Act access request.

This statement reflects the technical and organizational measures implemented by THOMSON Computing as of the publication date of this document.