

## EU Data Act User Data Notification

In compliance with our obligations under the EU Data Act (Regulation (EU) 2022/868), which comes into effect on the **12<sup>th</sup> of September 2025**, we hereby provide you, as users of our products and services, with this timely notification to clearly inform you about the data collected through our household appliances and devices, as well as other important pre-contractual information relevant to you.

This is to ensure transparency and to support your rights as a user to access and manage the data generated through the use of our products.

The data from your household appliances and devices produced and/or distributed under the Hisense Europe Group (Hisense, Gorenje, ASKO, Atag, Etna, or Pelgrim appliances) is collected when you connect them to the ConnectLife mobile app. Such data is held and managed by **ConnectLife Data Technologies, LLC**, Partizanska cesta 12, 3320 Velenje, Slovenia, as Data Holder in accordance with the EU Data Act.

For devices distributed by the Hisense Europe Group but connected via the VIDAA mobile app rather than the ConnectLife app, please refer to the official VIDAA websites, as VIDAA operates as a separate and independent entity.

Please note that this notification relates primarily to non-personal data collected through your use of connected products. For information on the processing of personal data, please refer to our **Data Protection Policy**, available on our official ConnectLife/Gorenje/Hisense websites and within the ConnectLife mobile app.

### A. Specification of Data Points by Product Category

Product Category	Data Points Collected	Collection Frequency
<b>Air Conditioners</b>	Operating Mode, Program State, Sensor Data, Consumption Data, Error Logs	Continuous and event-based
<b>Dehumidifiers</b>	Operating Mode, Program State, Sensor Data, Consumption Data, Error Logs	Continuous and event-based
<b>Dishwashers</b>	Operating Mode, Program State, Consumption Data, Error Logs	Per cycle and periodic reporting
<b>Heating Devices</b>	Operating Mode, Program State, Sensor Data, Consumption Data, Error Logs	Continuous and event-based

<b>Product Category</b>	<b>Data Points Collected</b>	<b>Collection Frequency</b>
<b>Cooktops and Hobs</b>	Operating Mode, Program State, Consumption Data, Error Logs	Per cycle and periodic reporting
<b>Cooker Hoods (Exhaust Fans)</b>	Operating Mode, Program State, Consumption Data, Error Logs	Per cycle and periodic reporting
<b>Ovens and Stoves</b>	Operating Mode, Program State, Sensor Data, Consumption Data, Error Logs	Per cycle and periodic reporting
<b>Refrigerators and Freezers</b>	Operating Mode, Program State, Consumption Data, Storage Inventory, Error Logs	Continuous and event-based
<b>Dryers</b>	Operating Mode, Program State, Sensor Data, Consumption Data, Error Logs	Per cycle and periodic reporting
<b>Washing Machines &amp; Washer-Dryers</b>	Operating Mode, Program State, Sensor Data, Consumption Data, Error Logs	Per cycle and periodic reporting
<b>Wine Climate Cabinets</b>	Operating Mode, Program State, Sensor Data, Consumption Data, Storage Inventory, Error Logs	Continuous and event-based

## **B. Duration of Retention**

In accordance with our obligations under the EU Data Act, specific retention periods for different types of non-personal data collected through connected household appliances are listed below. After the expiration of these periods, the data will no longer be accessible to the user.

Upon expiry of the applicable retention period, the data will either be securely deleted or anonymized. Anonymization entails aggregating or converting the data into statistical form in a manner that ensures it cannot be linked to any individual user or device ID.

For information concerning the retention of personal data, please refer to our Data Protection Policy, available on our website and within the ConnectLife mobile app.

The non-personal data collected from your connected appliances is retained solely to:

- Ensure the proper functioning, maintenance, and timely troubleshooting of the devices
- Support energy efficiency and water consumption monitoring, and optimize product performance
- Analyze usage patterns to develop and offer services that enhance user comfort and convenience
- Enable users to interact with devices more intuitively and autonomously, simplifying everyday tasks
- Providing product and/or service recommendations, subject to fulfillment of all other applicable requirements
- Enhance smart usage of the appliances to improve practical day-to-day living
- Drive innovation and the continuous development of our products
- Provide proactive and personalized customer support based on real-time device status and usage
- Fulfill applicable legal and regulatory obligations, including those under the EU Data Act
- Promote transparency and accountability in the management and use of your data

Retention periods are carefully determined to ensure that data is stored only for as long as necessary to meet these purposes.

Type of Data	Retention Period
Device Identification Data	10 years
Operating Mode	3 years
Program State	3 years
Sensor Data	3 years
Consumption Data	2 years
Error Logs	5 years
Storage Inventory	5 years

## C. Data Classification

When you create a profile in our ConnectLife mobile app and connect your household appliance, we collect both your personal and non-personal data.

**Personal data** is processed in accordance with applicable data protection regulations, including the General Data Protection Regulation (“GDPR”). Please note that the primary purpose of this notification is not to inform you about the processing of your “obvious” personal data (as name, surname, email, or user ID), but to inform you about non-personal, technical data (metadata) collected in connection with your use of the product.

**Non-personal data**, such as technical information related to product usage (e.g., temperature settings, usage cycles, energy consumption, error logs), is collected as outlined in the sections above, by product category. While this data is considered non-personal by nature, it may become **personal data** when it is linked to identifiable information within your ConnectLife profile—such as your name, surname, email, or user ID.

In such cases, even seemingly technical, non-personal data is treated as personal data and handled accordingly to ensure full compliance with applicable laws, including both the General Data Protection Regulation and the EU Data Act.

For more information about the processing of personal data, please refer to our **Data Protection Policy**, available on our official websites and within the ConnectLife mobile app.

## D. Data Security Measures

We are committed to protecting the data collected from your connected devices through robust security practices. To ensure the confidentiality, integrity, and availability of your data, we implement a range of technical and organizational measures, including but not limited to:

- Encryption of data to prevent unauthorized access
- Secure authentication protocols to ensure only authorized users can access data
- Regular security audits and vulnerability assessments to identify and mitigate risks
- Access controls and role-based permissions to restrict data access to necessary personnel only
- Continuous monitoring of our systems to detect and respond to potential security incidents promptly

These measures are regularly reviewed and updated to align with evolving security standards and legal requirements, including those set forth by the EU Data Act. Our goal is to maintain a secure environment that safeguards your data throughout its lifecycle.

## **E. Transfer and Format – Exercising User Access Rights**

The data listed above is accessible to the user upon request from the **12<sup>th</sup> of September 2025**, for the duration of the applicable retention periods outlined in this notification. Users may submit a request by contacting us via email at [privacy@connectlife.io](mailto:privacy@connectlife.io).

Access to your data is provided free of charge by securely transferring it through electronic channels via a **system-generated, encrypted download link**, ensuring the safe delivery of your information.

All data is made available in a **structured, commonly used, and machine-readable format**, specifically: JSON format.

## **F. Trade Secrets and Confidential Business Information**

In accordance with the EU Data Act, we are committed to protecting our trade secrets and confidential business information. Certain data generated by our products may contain proprietary information critical to our competitive position and innovation efforts.

Please note that under the EU Data Act, we are not obligated to share data that includes such trade secrets or confidential business information if disclosure would compromise our legitimate business interests. When data access is provided, strict confidentiality measures are applied to prevent unauthorized use or disclosure of sensitive information.

This approach ensures that you can benefit from data-driven services while we safeguard our proprietary technologies and competitive advantages.

## **G. Data Accessibility by other Parties**

To produce, deliver, and continuously improve our products and services, certain non-personal data collected from your connected household appliances may be shared with other parties. A complete list of these companies is maintained in a separate document, accessible via the following link: [EU-Data-Act-List-of-companies.pdf](#).

Any sharing of data with these companies is governed by agreements and legal requirements that ensure compliance with the EU Data Act and other applicable data protection laws. These agreements regulate how data is handled, used, and protected, and limit access solely to the purposes described above.

For more specific information about the sharing of personal data, please refer to our Data Protection Policy available on our official websites and within the ConnectLife mobile app.

Should you require more information about our third-party partners or the nature of data shared, please contact us at [privacy@connectlife.io](mailto:privacy@connectlife.io).

## **H. Other**

In case of any additional questions regarding data access or to exercise any of your rights under the EU Data Act, users are encouraged to contact us at the above-mentioned email address: [privacy@connectlife.io](mailto:privacy@connectlife.io).

If you believe that your rights under the EU Data Act have been infringed, you have the right to lodge a complaint with the competent supervisory authority, which will be designated by the respective Member State. This notification will be updated regularly to reflect any changes in our data handling practices or legal requirements arising under the EU Data Act.