# Information related to the EU Data Act

Remeha B.V. is a manufacturing company. We manufacture smart products and provide smart services to provide our customers with a comfortable indoor climate.

In accordance with the Data Act (Regulation (EU) 2023/2854) we act as data holder for the data generated by the connected products we produce and sell. To comply with article 3.2 of the Data Act, we provide the information below. This information is especially relevant for customers that consider to purchase, rent or lease one of our connected products or when you are already a user.

**Our contact details as manufacturer and as a data-holder:**

For all requests relating to the Data Act and the information on this page, you can send us an email:

privacy@remeha.nl

You can also communicate with us by post at the address below:

Remeha B.V.
Attn. Privacy Contact Person
Postbus 32
7300 AA Apeldoorn
The Netherlands

**Our connected products:**

All our products and comfort solutions (e.g. boilers, heat pumps, air conditioners, air handling- and ventilation systems and system controllers,) that can be connected and able to share product data to other systems or to the cloud, are connected products.

Data generated and collected:

Types of product data that are generated and collected by our connected product are:

- Sensor data (e.g. temperatures, water pressure etc.)
- Configuration data (setpoints, time schedules, operation modes etc.)
- Usage data (e.g. counters for energy usage, burner hours, etc.)
- Error and status data (e.g. active and historical errors or statuses)
- Identifiers (e.g. serial numbers of devices)

Sensor data is refreshed nearly real-time; other data is refreshed only when a change occurs. Apart from error data, for which a log is stored locally, only the last actual values are stored locally (on-device). The total amount of product data that is locally available depends on the product and system set-up and will normally not exceed 1 MB. All local product data is in a binary format.

Local product data is accessible where relevant via the HMI (Human Machine Interface), an accessory room unit or installer tooling. Locally stored values cannot be deleted or removed from the product, because they are of essence to the functioning of the product. Configuration data (settings) can be adjusted on-device, via for example the HMI, an accessory room unit or installer tooling or, when signed up for, via related services (such as the end-user app or a cloud-based portal for professionals). Some settings can only be changed by (certified) professionals, due to safety reasons.

The product data can be stored in the cloud only with your explicit approval and in combination with a related service (see below).

**Our related services:**

The related services that we offer for end users are the services offered in our end-user Apps and, only with the end-user's permission, services for professionals such as remote maintenance services via our cloud-based portal. These professionals act as data recipients under the Data Act. If we work with partners in offering these services, those partners are also considered Data Holder.

Product data collected and stored as part of the related services

The types of product data that can be collected and stored on our cloud-based platform are the same as the data mentioned under 'Our connected products' above. Depending on the product, exact service and the user scenario the amount of collected data and the frequency of collection can differ.

All relevant product data for the related service is generally collected every hour. Sensor data and configuration data are also collected when its value changes. Error data is on event and identifiers are refreshed only when a connection is (re)established.

Data is collected in JSON format but can be made available in other formats (see below for data access). The total amount of data can go up to 200 MB per day.

Data collection will only start when a related service is started. When the service is ended, the related data collection will be stopped. As long as any related service is active, product data is collected and stored in the cloud.

The product data that is collected as part of the related services are used by us for quality and research & development purposes. For further information on how we handle your personal data please check Privacy Notice
https://www.remeha.nl/privacyverklaring

Collected data is stored until you request it to be removed. To remove all product data, you can send a request via mail to: privacy@remeha.nl. We can only remove the data if there are no other users that use a related service on the product over the same time frame.

Access to Product data

As a user of our connected products or related services, you can access the product data in the following ways:

- Via your end-user App itself. The data is a selected set of product data relevant for you. This data is made available in a structured way and includes history where relevant and is in an understandable context and format.

- A personal user dashboard is under development to have a broader insight into product data including data related to remote maintenance services and the ability to download your data in a machine-readable format. This shall be implemented before the 12th of September 2026 in accordance with the Data Act.

A request can be sent to the contact address privacy@remeha.nl) of the data-holder to receive a data-download in a .CSV format for the applicable product data stored.

Design for accessibility

In accordance with the EU Data Act, all connected products and related services placed on the EU market from 12 September 2026 will be designed to ensure that users can directly and securely access the product data. The data will be provided in a structured, commonly used and machine-readable format to allow interoperability and portability.

Sharing Product Data

As a user of a related services on one of our connected products, you can request product data to be shared to an appointed third party:

You can send your request to receive a data-download in .CSV format to privacy@remeha.nl and can be further shared with a third party on your own merits.

- An API program is under development. When available a third party will need to subscribe to our API program. Hereafter you will be able to give this third-party access to your product data on the API using your user account. It will also be possible to withdraw the access at any time. This shall be implemented before the 12th of September 2026.

- In the situation we offer remote maintenance as a related service on a connected product, we will share relevant product data for this service with the designated 3rd party professional. Data sharing in this context will only be started and stopped on explicit request of the user.

As a data holder under the EU data act, we will not share product data to any third party beyond your request.

Trade secrets:

The data that is accessible from the connected product or generated during the provision of a related service could potentially contain trade secrets. If so, the relevant BDR company is considered the trade secret holder.

Complaints:

You have the right to lodge a complaint alleging a violation of the provisions of chapter two of the Data Act with the competent authority (pursuant to article 37 Data Act) in your country.