# EU Data Act

HYTRONIK®
SENSORS & LIGHTING CONTROL

**Introduction**

The EU Data Act (Regulation (EU) 2023/2854) entered into force on 11 January 2024 and became applicable on 12 September 2025. This regulation establishes harmonized rules on fair access and use of the data generated by connected products.

This document applies to the following product categories: Bluetooth-enabled lighting control system level components, sensors, drivers, controllers, etc. integrated with the Koolmesh platform (full list provided in Appendix). This document sets out the information required under Article 3 (2) of the EU Data Act regarding data generated by Hytronik Bluetooth-enabled products integrated with the Koolmesh system, as well as users' rights to access and use such data.

---

## 1. Data Generation

Type, Format, and Estimated Volume of Product Data

| Data Category | Details | Format | Estimated Volume |
|---|---|---|---|
| Technical Data | IP addresses, device identifiers (MAC addresses), network metadata, firmware version information | JSON/XML | ~50MB per project per year (varies by number of devices, typically 10-500 devices per project) |
| User Data | Account credentials (encrypted), user preferences (lighting schedules, scene settings), account permission configurations | Encrypted JSON | ~10MB per project per year |
| Operational Data | Device status (on/off, dimming level), energy usage metrics, emergency lighting test results, occupancy statistics, system diagnostics | CSV/JSON | ~100MB per project per year |

Data is provided in structured, commonly used, and machine-readable formats to ensure interoperability with third-party systems. The data includes both raw data generated by the devices and processed data derived from analytics performed within the Koolmesh system.

Access to certain data may be restricted where disclosure would compromise security, confidentiality, or intellectual property, in accordance with applicable regulations. In addition, data may be made available to public sector bodies upon legally binding requests under exceptional circumstances, in compliance with the EU Data Act.

## 2. Data Storage Details

### 2.1 Storage Method

**Remote Storage**: AWS IoT Server located in Frankfurt, Germany (compliant with EU data residency requirements).

**On-device Storage**: Temporary local caching of operational data on gateways and sensors (no permanent on-device data retention).

### 2.2 Intended Storage Duration

| Data Type | Retention Period | Basis |
|---|---|---|
| Emergency Lighting Test Data | 5 years | In accordance with regulatory requirements |
| User Data (Credentials, Preferences) | Contract duration + 24 months post-contract termination | Aligned with GDPR data retention principles |
| Technical & Operational Data | 3 years post-last device activity | Compliant with "data minimization" principle (GDPR) |

**Data availability includes both real-time data streams and historical datasets accessible via the platform.*

**All data is automatically purged upon reaching the retention period, with deletion logs maintained for audit purposes.*

## 3. Data Access, Retrieval, and Deletion

**Data Access:** Authorized users (Admin/Sub-user) access data via the Koolmesh cloud platform (www.iot.koolmesh.com) or mobile/web applications, authenticated via encrypted account credentials.

Users are provided with direct access to data where technically feasible, including via user interfaces and, where available, application programming interfaces (APIs).

**Data Retrieval:** Operational data, test reports, and usage statistics can be exported as CSV/Excel files from the cloud platform; system logs are available for download in JSON format.

**Data Deletion:** Account-level deletion: Admin users submit requests via the Koolmesh Support Portal. - Partial data deletion: Specific operational data deletable via the platform's data management module. - Emergency deletion: Available via 24/7 technical support for critical scenarios.



**Terms of Use**

Data access is restricted to authorized users in accordance with role-based permissions (Admin/Installer/Sub-users) as defined in the Koolmesh System Security Framework. Third-party data access is not permitted unless explicitly requested or authorized in writing by the user, and such authorization must comply with GDPR Data Processing Agreements (DPAs).Upon user request, data may be made available to third parties designated by the user under fair, reasonable, and non-discriminatory (FRAND) conditions as stipulated in the EU Data Act. All data operations (access, retrieval, deletion) are logged with timestamp and user identifier for audit trails.

## 4. Service Commitments

| Service Metric | Commitment |
|---|---|
| Data Retrieval Response Time | Standard requests: ≤ 1 business day- High-priority requests: ≤ 4 hours |
| Deletion Completion Time | ≤ 72 hours from request submission (with confirmation notification) |
| Support Channels | Email: info@koolmesh.com- 24/7 Emergency Hotline |

## 5. Provision of Information

This EU Data Act compliance statement, along with supporting documents, is provided exclusively via **deep links labeled "EU Data Act"** through the existing electronic catalog channel. The information is updated regularly (at least annually or upon material changes to data practices) to ensure validity and compliance with the latest regulatory requirements.

This information is made available to users via electronic means, including product documentation and online resources, in accordance with the EU Data Act.

Hytronik acts as a data holder under the EU Data Act and ensures that:
- Data is made available to users in a transparent and non-discriminatory manner
- No unfair contractual terms are imposed
- Data access is provided without undue delay

## 6. Supporting Documents

- GDPR Compliance Statement for Koolmesh: GDPR-Compliance-Statement-for-Koolmesh-V1.1.pdf
- Koolmesh System Security V3: Koolmesh-System-Security-V2.pdf
- Koolmesh Service Level Agreement (SLA): Koolmesh-Service-Level-Agreement.pdf

**APPENDIX:**

| Product Category | Product Models | Data Generated |
|---|---|---|
| Bluetooth Sensor | HBIR Series, HIR60 Series, /BT Series, HBHC Series, HBMW Series, HBST Series | Occupancy data, motion detection status, ambient light levels, device status, |
| Bluetooth LED Driver | /BT Series, HBEW Series | Power consumption data, output status, dimming levels, operating parameters, fault status, diagnostic data |
| Bluetooth Emergency Drivers & Inverters | HBEM Series | Emergency test results, battery status, charging status, fault logs, compliance reports, diagnostic data |
| Bluetooth Control and Receiver Nodes & Bluetooth Modular Wiring System | HBTD Series, /BT Series | Control signal data, device status data, configuration data, network communication data |
| Bluetooth Gateway | HBGW Series | Device connectivity data, network communication data, data transmission records, system logs |
| Bluetooth System Level Component （e.g. control panels, kinetic switch, real-time keeper） | HTG, HBKS Series, HBP Series, HPAD | System configuration data, network topology data, synchronization status |

**The above data categories include both raw data generated by the devices and processed data derived within the Koolmesh system.*

**Only products with connectivity and system integration capabilities generate and transmit data as described above.*

**HYTRONIK INTERNATIONAL**

**Hytronik UK:**
Unit 3 Tallow Way, Fairhills Industrial Estate, Irlam, Manchester, M44 6RJ, United Kingdom
E-mail: info@hytronik.com

**Hytronik DACH:**
Heinrich-Hertz-Straße 15 / 65582 Diez. Germany
E-mail: support_dach@hytronik.com

**Hytronik Iberia & Latam:**
Carrer del Moro Zeid, 11, Piso 3, Ciutat Vella, 46001 Valencia
E-mail: support_dach@hytronik.com

**Hytronik SVK & CZE:**
Techlum s.r.o (Slovakia, Slowenia) Staré Grunty 7A 841 04 Bratislava
E-mail: info@techlum.sk

**Hytronik Asia:**
Pude Industrial Park, Dushi Village, Pingtan Town, Huiyang District, Huizhou City 516259
E-mail: info@hytronik.com