Compliance Disclosure Statement Pursuant to EU Data Act

Consumer Notice：

This document is prepared in accordance with the requirements of Article 3 of the EU Data Act (Data Act), for the purpose of fully disclosing to you the data processing information related to the purchased Connected Products of Lumi United Technology Co., Ltd. (hereinafter referred to as “Lumi Company”, “we”, “us” or “our”) and our relevant services.

This document only applies to your use of **[Doorlock]** provided by us.

According to Data Act, the following Lumi **[Doorlock]** may be classified as connected products.

Numbers	Products
1	Smart Lock U200
2	Smart Lock U200 Lite

The data collected by Lumi Doorlock may vary depending on the versions and models.

I. Connected Product Information Disclosure

1. Data Generation Details

DataType	PurposesofData Processing	Format	Estimated Volume	DataGeneration Continuity	Storage Method	Theproducts involved
Connection data	Maintain the connection between the device and server	json	10KB-50KB per day	Continuous real-time generation	The device does not store data locally	Smart Lock U200 Smart Lock U200 Lite
User creden	Store the credentials when the user adds	bin	Each credentail is about	Depend on user operation	Local	Smart Lock U200

tial	them, and verify it on user authentication		0.2KB ~ 4KB in size, with a maximum of 75 credentials			
Customer Usage Data	Device setting	bin	1KB-10KB	Depend on user operation	Stored locally first, then uploaded to the cloud	Smart Lock U200 Smart Lock U200 Lite
Device Event	Report and record device event	bin	0KB-100KB per day	Trigger-base generation	Stored locally first, then uploaded to the cloud	Smart Lock U200 Smart Lock U200 Lite

2. Data Storage Information

- Remote Storage: Currently, Lumi Company has data centers in China, United States, Singapore, Russia and Germany. If you are a Europe Union user, the product data will be stored on the German server. The Cloud storage retention period is up to 7 days. On device storage retention period depends on the needs of the contract and service performance. In general, you can delete the data yourself or ask Lumi to delete it.

3. User Access and Control Rights

You have rights and choices when it comes to the product data. You may be afforded certain rights under applicable laws, which may include the right to access, retrieve or erase the data.

You may submit a request to exercise your rights under applicable laws at privacy@lumiunited.com. You may appeal any decision we have made about your request by following the instructions in the communication you receive from us notifying you of our decision. We will resolve your request within seven days after receiving your email.

II. Related Services Information Disclosure

1. The details of the product data that we are expected to obtain

Nature	Purposes of Data Processing	Estimated Volume	Collection Frequency	Storage Method	The products involved
Device operation and status data	For device connectivity/control, status sync, and security/performance assurance.	Each device generates about 1–20 KB of data per day; total daily data per user is typically below 1 MB.	Real-time or when users use the App	Stored locally first, then uploaded to the cloud	Aqara Home App
Customer Usage Data	For account/service delivery, sync/restore user customizations (scenes/device names, etc.), product improvement	An active user generates approximately 30–80 KB per day, equivalent to 10–30 MB per year.	Real-time or Event-triggered	Stored locally first, then uploaded to the cloud	Aqara Home App
System Diagnostic and Log Data	For troubleshooting and reliability (error triage, crash analysis, performance monitoring)	Average of less than 5 KB per day, or 1–2 MB per year per device.	collected only during errors or user feedback submissions.	Stored locally first, then uploaded to the cloud	Aqara Home App

- **Access Method:** You have rights and choices when it comes to the product data. You may be afforded certain rights under applicable laws, which may include the right to access, retrieve or erase the data. You may submit a request to exercise your rights under applicable laws at privacy@lumiunited.com. You may appeal any decision we have made about your request by following the instructions in the communication you receive from us notifying you of our decision. We will resolve your request within seven days after receiving your email.
- **Data Storage Information:** Currently, Lumi Company has data centers in China, United States, Singapore, Russia and Germany. If you are a Europe Union user, the product data will be stored on the German server. The Cloud storage retention period is up to 7 days. On device storage retention period depends on the needs of the contract and service performance. In general, you can delete the data yourself or ask

Lumi to delete it. All the product data on the device will be erased when you reset your device to factory default settings. **To implement this, go to the Aqara Home App and navigate to: "Profile" → "Settings" → "Account and Security" → "Delete Account Cancellation."** Beware that factory settings can't be undone, so you have to make sure that you don't need the information any more.

2. The details of the Related Service data to be generated

Nature	Purposes of Data Processing	Estimated Volume	Collection Frequency	Storage Method	The products involved
Connection data	Maintain the connection between the device and server	50KB-100KB per day	Continuous real-time generation	cloud	Smart Lock U200 Smart Lock U200 Lite
User credential	Store the credentials when the user adds them, and verify on user authentication	Each credentail is about 0.2KB ~ 4KB in size, with a maximum of 75 credentials	Depend on user operation	Local	Smart Lock U200
Customer Usage Data	Device setting	1KB-10KB	Depend on user operation	Stored locally first, then uploaded to the cloud	Smart Lock U200 Smart Lock U200 Lite
Device Event	Report and record device event	0KB-100KB per day	Trigger-base generation	Stored locally first, then uploaded to the cloud	Smart Lock U200 Smart Lock U200 Lite
System Diagnostic and Log Data	For troubleshooting and reliability (error triage, crash analysis, performance	Average of less than 5 KB per day, or 1–2 MB per year per	collected only during errors or user feedback submissions.	Stored locally first, then uploaded to the cloud	Smart Lock U200 Smart Lock U200 Lite

Nature	Purposes of Data Processing	Estimated Volume	Collection Frequency	Storage Method	The products involved
	monitoring)	device.			

- **Access Method:** You have rights and choices when it comes to the Related Service data. You may be afforded certain rights under applicable laws, which may include the right to access, retrieve or erase the data. You may submit a request to exercise your rights under applicable laws at privacy@lumiunited.com. You may appeal any decision we have made about your request by following the instructions in the communication you receive from us notifying you of our decision. We will resolve your request within seven days after receiving your email.
- **Data Storage Information:** Currently, Lumi Company has data centers in China, United States, Singapore, Russia and Germany. If you are a Europe Union user, the Related Service data will be stored on the German server. The Cloud storage retention period is up to 7 days. On device storage retention period depends on the needs of the contract and service performance. In general, you can delete the data yourself or ask Lumi to delete it. All the Related Service data on the device will be erased when you reset your device to factory default settings. To implement this**, for Doorlock , you can long press the reset button and verify admin credential to delete all local user data.** Beware that factory settings can't be undone, so you have to make sure that you don't need the information any more.

3. Third-Party Sharing

In general, Lumi will not share these data with third parties. Lumi will ask for the consent of users in the cases that it needs to invite third parties to provide services for users.

4. Identity of Data Holder and Processors

- Data Holder: Lumi United Technology Co., Ltd.
  - Geographical Address: Room 801-804, Building 1, Chongwen Park, Nanshan iPark, No. 3370, Liuxian Avenue, Fuguang Community, Taoyuan Residential District, Nanshan, Shenzhen, China.
  - Contact: privacy@lumiunited.com

- There are no other data processors.

5. The indication of how the user can request that the data be disclosed to a third party and how to stop the data transfer

- Sharing Request Method:

a. [You may submit a request to exercise your rights under applicable laws at privacy@lumiunited.com]

- Sharing Termination Method:

a. [You may submit a request to exercise your rights under applicable laws at privacy@lumiunited.com]

6. Right of appeal

You may exert your appeal right by contacting us at privacy@lumiunited.com, and we will respond to your request within timeframe set out under your applicable data protection laws.

7. Complaint Right

You have the right to lodge a complaint with the competent authority designated pursuant to Article 37 of the Data Act for any violations related to this document:

You may find the contact details of your local supervisory authority in EU member states on the website of the European Data Protection Board: https://edpb.europa.eu/about-edpb/board/members_en

8. Trade Secrets Statement

[Lumi United Technology Co., Ltd.] is the trade secret holder.

9. Contract Duration and Termination

- Service Duration: In general, the contract for providing related services will be valid until consumers terminate it or withdraw their consent for data processing.
- Termination Scenarios:

a. You withdraw your consent;

b. After we confirm your deletion or cancellation;

c. We terminate the operation of the corresponding products and services.