Compliance Disclosure Statement Pursuant to the 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 related services.

This disclosure applies to the **Aqara Curtain Controller C100** supplied by us.

For the purposes of the EU Data Act, the **Aqara Curtain Controller C100** is a connected product.

Numbers	Products
1	**Aqara Curtain Controller C100**

The data generated or collected may vary according to the firmware version, enabled features, connected hub or network environment, and user settings.

I. Connected Product Information Disclosure

1. Data Generation Details

Data Type	Purposes of Data Processing	Format	Estimated Volume	Generation Frequency and Continuity	Storage Method	Product Involved
Connection Data	Device connectivity, communication maintenance, and status synchronization.	JSON	Approximately 10-50 KB/day.	Generated continuously in real time while the product is connected.	Not stored on the product; may be transmitted when an applicable online function is used.	Aqara Curtain Controller C100
Control Data	Curtain opening, closing, stopping, and position control.	JSON	Approximately 220 bytes per operation.	Generated when a control operation is triggered.	Stored locally; may be transmitted when an applicable online function is used.	Aqara Curtain Controller C100

Data Type	Purposes of Data Processing	Format	Estimated Volume	Generation Frequency and Continuity	Storage Method	Product Involved
Functional Configuration Data	Curtain direction, travel limits, speed, operating mode, and other settings.	JSON	Approximately 220 bytes per configuration event.	Generated when a setting is created or changed.	Stored locally; may be transmitted when synchronization or another online function is used.	Aqara Curtain Controller C100
Curtain Status Data	Display and synchronization of the current position and operating status.	JSON	Approximately 5-400 KB/day.	Generated when the curtain position or operating status changes.	Stored locally; may be transmitted when an applicable online function is used.	Aqara Curtain Controller C100

2. Data Storage Information

- Local storage: Connection data are not stored on the product. Control, configuration, and curtain-status data stored locally on the product are retained until deleted by a factory reset, replaced by updated settings or status, or overwritten under the applicable device-storage rules. Cloud storage: For users in the European Union, cloud logs and product data transmitted through an enabled online function are stored on servers in Germany and retained for up to 7 days by default, unless the user selects a shorter period or the applicable service terms state otherwise. Account and device-binding data are retained until the device is unbound or the account is deleted, subject to applicable law. Cloud-synchronized configuration data are retained until deleted, replaced, or the applicable account or service is terminated.

3. User Access, Retrieval, and Erasure

Where available, product data may be accessed or retrieved through the applicable functions in the Aqara Home App. For other readily available product data, the user may submit an electronic request to privacy@lumiunited.com. Eligible data will be provided without undue delay, free of charge, and in a structured, commonly used, machine-readable format where applicable and technically feasible.

To erase data stored locally on the product, follow the factory-reset instructions in the user manual applicable to the Aqara Curtain Controller C100. A factory reset does not delete cloud

account data. To delete data stored in the cloud or by a related service, use the applicable deletion function in the Aqara Home App or contact privacy@lumiunited.com.

II. Related Services Information Disclosure

1. Product Data Expected to Be Obtained by Related Services

Data Type	Purposes of Data Processing	Format	Estimated Volume	Collection Frequency	Storage Method	Related Service Obtaining the Data
Connection Data	Remote connectivity, communication maintenance, and status synchronization.	JSON	Approximately 10-50 KB/day.	Collected continuously while the product uses an enabled online connection.	Stored in the cloud only when obtained through an enabled online function.	Aqara Home App and applicable Aqara cloud services
Control Data	Remote curtain opening, closing, stopping, and position control, including execution feedback.	JSON	Approximately 220 bytes per operation.	Collected when a remote control operation is performed.	Stored in the cloud only when transmitted through an enabled online function.	Aqara Home App and applicable Aqara cloud services
Functional Configuration Data	Synchronization or restoration of direction, travel limits, speed, mode, and other settings.	JSON	Approximately 220 bytes per configuration event.	Collected when settings are created or changed and synchronization is enabled.	Stored in the cloud only when synchronization or another online function is enabled.	Aqara Home App and applicable Aqara cloud services
Curtain Status Data	Remote status display, position synchronization, and control-result feedback.	JSON	Approximately 5-400 KB/day.	Collected when status changes and the corresponding online function is enabled.	Stored in the cloud only when obtained by the enabled related service.	Aqara Home App and applicable Aqara cloud services

- **Access Method: Product data obtained by an enabled related service may be accessed or retrieved through the corresponding Aqara Home App function where available. For other readily available product data, the user may submit an electronic request to privacy@lumiunited.com, identifying the user, product, and**

requested data categories. Eligible data will be provided without undue delay, free of charge, and in a structured, commonly used, machine-readable format where applicable and technically feasible.

- **Storage and Retention: Product data are obtained by the Aqara Home App and applicable Aqara cloud services only when the corresponding remote-control, synchronization, notification, diagnostic, or other upload-enabled function is used. Cloud logs and transmitted product data are retained for up to 7 days by default, unless the user selects a shorter period or the applicable service terms state otherwise. Account and device-binding data are retained until the device is unbound or the account is deleted. Cloud-synchronized configuration data are retained until deleted, replaced, or the applicable account or service is terminated. Data that are not transmitted remain subject to the applicable local deletion, factory-reset, replacement, or overwrite rules.**

2. Data Generated During the Provision of Related Services

Nature of Data	Purposes of Data Processing	Estimated Volume	Generation or Collection Frequency	Storage Method	Related Service Involved
Remote Control and Service Interaction Records	Remote connectivity and control, status synchronization, execution feedback, and service security.	Approximately 50-200 KB/device/day; typically less than 1 MB/user/day.	Generated when an online control, connection, or synchronization function is used.	Stored locally and/or in the cloud as required for the enabled function.	Aqara Home App and applicable Aqara cloud services
Account, Configuration, and Service Usage Data	Account services and synchronization or restoration of user settings and customizations.	Approximately 30-80 KB/active user/day, or 10-30 MB/year.	Generated at sign-in, product linking, setting changes, or use of synchronization or backup.	Stored locally and/or in the cloud as required for the enabled service.	Aqara Home App and applicable Aqara cloud services
Service Diagnostic and Log Data	Troubleshooting, error analysis, reliability, and performance monitoring.	Less than 5 KB/day on average, or 1-3 MB/device/year.	Generated upon errors, remote diagnostics, or user feedback.	Stored locally by default and uploaded only when the relevant function is triggered.	Aqara Home App and applicable Aqara cloud services

- **Access Method: Related service data may be accessed, corrected, exported, or deleted through the corresponding Aqara Home App function where available. The user may also submit an electronic request to privacy@lumiunited.com, identifying the account, product, and requested data categories. Data within the scope of the EU Data Act will be made available without undue delay, free of charge, and in a structured, commonly used, machine-readable format where applicable and technically feasible.**
- **Data Storage and Retention: For users in the European Union, remote-control and service-interaction logs, diagnostic logs, and user-submitted technical-support data stored in the cloud are retained for up to 7 days by default, unless the user selects a shorter period or the applicable service terms state otherwise. Account and device-binding data are retained until the device is unbound or the account is deleted. Configuration and service-setting data are retained until deleted or replaced by the user, or until the applicable account or service is terminated. Diagnostic data remain local until deleted or overwritten under the applicable log settings; diagnostic data uploaded for technical support are retained for up to 7 days by default. Data required by applicable law or for the establishment, exercise, or defence of legal claims may be retained for the legally required period.**

3. Third-Party Sharing

We do not make product data or related service data available to a third party unless the user requests or enables the sharing, the sharing is necessary to provide a service selected by the user, or the disclosure is otherwise permitted or required by applicable law. Where a service provider processes data on our behalf, we require the provider to process the data only for the agreed purpose and subject to appropriate contractual and security safeguards.

4. Identity of the Data Holder and Related Service Provider

- Data Holder and Related Service Provider: 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

- We may engage service providers to support hosting, storage, security, maintenance, and customer support. Such providers act under contractual obligations appropriate to their respective roles.

5. How the User Can Request Disclosure to a Third Party and Stop the Transfer

- Sharing Request Method:

a. The user may submit a request to privacy@lumiunited.com identifying the user and product, the requested data categories and time period, and the intended third-party recipient and delivery details. After proportionate verification, we will make the eligible data available to the designated third party in a structured, commonly used, machine-readable format where applicable and technically feasible.

- Sharing Termination Method:

a. The user may stop an ongoing transfer through the applicable sharing control, where available, or by contacting privacy@lumiunited.com and identifying the transfer to be stopped. We will stop future transfers without undue delay, except where continued transfer is required by applicable law. Data already received by the third party remain subject to the third party's own legal obligations.

6. Right of Appeal

If we refuse or limit a request, the user may request reconsideration by contacting privacy@lumiunited.com. This does not affect the user's right to lodge a complaint with the competent authority or seek judicial or other available remedies.

7. Complaint Right

The user has the right to lodge a complaint alleging an infringement of Chapter II of the EU Data Act with the competent authority designated pursuant to Article 37 in the Member State of the user's habitual residence, place of work, or establishment.

Information on the competent authority or data coordinator may be obtained from the relevant Member State authority or the European Commission's published information on implementation of the EU Data Act.

8. Trade Secrets Statement

Certain technical data may contain trade secrets held by Lumi United Technology Co., Ltd. Where disclosure involves trade secrets, we will identify the protected data and apply proportionate confidentiality measures in accordance with Article 4(6) of the EU Data Act. Such measures will not be used to restrict the user's access rights except as permitted by applicable law.

9. Contract Duration and Termination

- Service Duration: The contract for the related service remains in force while the user's account or relevant service remains active, unless terminated by the user or us in accordance with the applicable service terms.
- Termination Scenarios:

a. The user closes the account or terminates the relevant service in accordance with the applicable service terms;

b. We confirm completion of a valid account or service cancellation request; or

c. We discontinue the relevant service in accordance with the applicable service terms and applicable law.