Compliance Disclosure Statement Pursuant to the EU Data Act

Consumer Notice:

This document is prepared in accordance with Article 3 of the EU Data Act to disclose information concerning data generated by the connected products identified below and data generated in the provision of related services by Lumi United Technology Co., Ltd. ("Lumi", "we", "us" or "our").

This document applies to the two products listed below (collectively, the "Hub") provided by us. Hub product data include data generated by the gateway and data generated or stored locally by the integrated Aqara Studio environment.

The following Lumi products are connected products within the scope of this disclosure.

Number	Product
1	Edge Hub M300
2	DIN Rail Hub AX100M

In this disclosure, "Hub" refers to the connected products listed in the product table. The data source or generating component is identified separately to distinguish data generated by the Hub or connected devices from data generated by Aqara Studio or Aqara Life App, as applicable. Data categories and volumes may vary according to configuration and actual use.

I. Connected Product Information Disclosure

1. Data Generation Details

Data Type	Purposes of Data Processing	Format	Estimated Volume	Data Generation Frequency and Continuity	Storage Method	Product / Generating Component
Identification, Connection and Configuration Data	Device identification, network onboarding, connection maintenance, capability mapping and device configuration.	JSON	Basic device data: less than 5 KB/day; connection data: approximately 50-100 KB/day.	Generated at startup or upon configuration changes, and continuously or periodically while connected.	Generated by the Hub or a connected device and stored locally in Hub/Aqara Studio.	Hub / Hub gateway firmware and connected-device interface

Data Type	Purposes of Data Processing	Format	Estimated Volume	Data Generation Frequency and Continuity	Storage Method	Product / Generating Component
Device Operation, Status and Control-Result Data	Device control, status display and feedback of device execution results.	JSON	Approximately 0-50 KB/day.	Generated when a device status changes or the Hub or a connected device executes a control instruction.	Raw product data are stored locally in Hub/Aqara Studio according to local log settings.	Hub / Hub gateway firmware and connected devices
Device Measurement, Energy, Alarm and Diagnostic Data	Status monitoring, energy monitoring, alarm notification, fault diagnosis and maintenance.	JSON	Detection and alarm event data: approximately 0-100 KB/day; measurement volume varies with the reporting interval.	Generated when the connected device reports a measurement or when an alarm, fault or diagnostic event occurs.	Raw product data are stored locally in Hub/Aqara Studio. Studio-generated aggregates are disclosed as related service data.	Hub / Hub gateway firmware and connected devices
Device Firmware Version and Update-Result Data	Firmware version management, update-status display and troubleshooting.	JSON	Normally one device status or result record per update.	Generated when the Hub performs an update or reports its firmware version, progress or result.	Stored locally in the Aqara Studio firmware repository or update log; cloud firmware is available while the update service is provided.	Hub / Hub gateway firmware

2. User Access and Control Rights

You have rights in relation to product data, including the right to access, retrieve or erase such data where provided by applicable law.

You may use the applicable functions of Aqara Studio or Aqara Life App, as applicable, to access available data. Where direct access is not available, you may submit a request at privacy@lumiunited.com. We will respond within seven days after receiving your email.

II. Related Services Information Disclosure

1. Product Data Expected to Be Obtained by Related Services

Nature of Data	Purposes of Data Processing	Estimated Volume	Collection Frequency	Storage Method	Related Service Obtaining the Data
Identification, Connection and Configuration Data	Network onboarding, status synchronization, capability mapping and device management.	Basic device data: less than 5 KB/day; connection data: approximately 50-100 KB/day.	Collected at startup or when configuration changes, and continuously or periodically while connected.	Stored locally in Aqara Studio; relevant cloud binding data are stored only when App or cloud functions are used.	Aqara Studio; Aqara Life App, where enabled
Device Operation, Status and Control-Result Data	Local or remote control, status display and feedback of device execution results.	Approximately 0-50 KB/day.	Collected when device status changes or a control instruction is executed.	Stored locally in Aqara Studio; relevant data may be transmitted to the App when the App function is used.	Aqara Studio; Aqara Life App, where enabled
Device Measurement, Energy, Alarm and Diagnostic Data	Monitoring, alarm handling, troubleshooting and maintenance.	Detection and alarm event data: approximately 0-100 KB/day; measurement volume varies with the reporting interval.	Collected when the product reports measurements, alarms, faults or diagnostic results.	Stored locally in Aqara Studio; technical-support uploads occur only when the relevant function is used.	Aqara Studio; Aqara Life App, where enabled
Device Firmware Version and Update-Result Data	Version display, update delivery, progress display and troubleshooting.	Normally one device status or result record per update.	Collected when an update is initiated or performed and when the Hub reports the result.	Stored in Aqara Studio update records; the update service processes relevant data when used.	Aqara Studio; Aqara Life App, where enabled

- **Access Method: Product data available to users may be viewed or managed through Aqara Studio or Aqara Life App, as applicable. Where direct access or download is not available, you may submit a request at privacy@lumiunited.com. We will respond within seven days after receiving your email.**

2. Related Service Data Generated in the Provision of Related Services

Nature of Data	Purposes of Data Processing	Estimated Volume	Collection Frequency	Storage Method	Related Service Involved
Account, Authorization, Space and Device-Relationship Data	Account binding, authentication, access control, security auditing and organization of spaces and devices.	Normally one record per operation.	Generated when accounts, users, permissions, spaces or device relationships change, and during login or authorization events.	Mainly stored locally in Aqara Studio; cloud binding data are retained until the user unbinds the Hub.	Aqara Studio / Aqara Life App, as applicable
User Configuration, Scene, Automation and Control-Interaction Data	Saving settings, executing scenes and automations, issuing control requests and recording service-side results.	Normally one record per configuration or action.	Generated when users configure or control devices, change integrations or trigger rules.	Mainly stored locally in Aqara Studio; external transfer occurs only through user-enabled integrations.	Aqara Studio / Aqara Life App, as applicable
Service Logs, Aggregated Energy, Alarm and Diagnostic Data	Service operation, security auditing, energy analysis, alarm handling, troubleshooting and support.	Energy summaries are normally generated every 30 minutes; other records are event-driven.	Generated by Studio during service calls, aggregation, automation, alarm handling, login, configuration or support events.	Normally stored locally in Aqara Studio; logs may be uploaded when the user uses technical-support functions.	Aqara Studio / Aqara Life App, as applicable

Nature of Data	Purposes of Data Processing	Estimated Volume	Collection Frequency	Storage Method	Related Service Involved
Gateway Replacement and Studio Backup, Restore, Update and Support Data	Backup, recovery, migration, update management and technical support.	Gateway replacement backup: approximately 20 KB-1 MB/event (tar.gz); Studio local backup: approximately 4.99-5.55 MB/backup; one update-task record/task.	Gateway replacement backup: event-triggered. Studio backup: daily at 00:00 or manually. Other records: event-triggered.	Aqara Studio retains the latest three local backups; cloud backup is optional and user-controlled.	Aqara Studio / Aqara Life App, as applicable

- **Access Method: Related service data available to users may be viewed or managed through Aqara Studio or Aqara Life App, as applicable. Where direct access or download is not available, you may submit a request at privacy@lumiunited.com. We will respond within seven days after receiving your email.**

Data Storage and Deletion Information

For users in the European Union, cloud logs and data stored in the cloud at the user's request are stored on servers in Germany and retained for up to 7 days by default, unless the relevant table or applicable service terms state otherwise. As applicable, local data on the Hub or in Aqara Studio are retained until user deletion, factory reset or device unbinding, for the log period configured by the user, or until overwritten when storage capacity is reached. Factory-reset instructions are provided in the applicable user manual. Data in Aqara Studio may be deleted using its management or deletion functions. Cloud or other related-service data may be deleted using the available deletion function in Aqara Studio, Aqara Life App or the applicable related service. If direct deletion is unavailable, please contact Lumi at privacy@lumiunited.com. Data required by law or for legal claims may be retained.

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. Depending on the

functions enabled for the Hub and Aqara Studio, such integrations may include Matter Bridge, BACnet, KNX or developer interfaces.

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
- As of the date of this disclosure, no other parties process the data described in this disclosure on Lumi′ s behalf. If this changes, we will update the relevant disclosure as required by applicable law.

5. How to Request and Stop Third-Party Data Sharing

- Sharing Request Method:

a. You may request that available data be provided to a designated third party by contacting privacy@lumiunited.com and identifying the data, recipient and requested sharing arrangement.

- Sharing Termination Method:

a. You may stop an ongoing data-sharing arrangement through the applicable Studio, App or integration controls, or by contacting privacy@lumiunited.com.

6. Requests and Concerns

If you have questions or concerns about this disclosure, please contact us at privacy@lumiunited.com. We will respond within the timeframe required by applicable law.

7. Complaint Right

You have the right to lodge a complaint alleging an infringement of Chapter II of the Data Act with the competent authority designated under Article 37 of the Data Act in the relevant EU Member State.

Contact details for the competent authority or data coordinator may be obtained from the official website of the relevant EU Member State or from the European Commission's public register, where available.

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: In general, a related-service contract remains in effect until it expires or is terminated in accordance with the applicable service terms. Withdrawal of consent for data processing does not automatically terminate the contract; its effect on the related service depends on the processing concerned and the applicable service terms.
- Termination Scenarios:

a. The related-service contract expires or is terminated in accordance with the applicable service terms;

b. Upon completion of the deletion of your account or termination of the related service at your request;

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