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 Company", "we", "us" or "our").

This document applies to the Smart Lock U600 provided by us.

The following Lumi Company product is a connected product within the scope of this disclosure.

Numbers	Products
1	Smart Lock U600

Data volumes may vary with firmware, 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 Involved
Connection Data	Used to maintain the connection between the device and server, including pairing and login.	Binary (bin)	Less than 8 kB per pairing operation; less than 4 kB per login or connection-maintenance operation.	Event-triggered.	Stored locally and in the cloud.	Smart Lock U600
Device Configuration Data	Used to maintain device settings.	Binary (bin)	Less than 100 kB in total for device configuration.	Generated when configured by the user.	Stored locally and in the cloud.	Smart Lock U600

Data Type	Purposes of Data Processing	Format	Estimated Volume	Data Generation Frequency and Continuity	Storage Method	Product Involved
User Credential Content Data	Used to store and manage password, fingerprint and NFC credential contents for unlocking.	Binary (bin)	Less than 2.5 MB in total for user credential data.	Generated or updated when user credentials are added, modified or deleted.	Stored locally on the lock only. Credential contents are not uploaded to the cloud.	Smart Lock U600
User-Credential Association Data	Used to maintain the association between users and their credentials, excluding credential contents.	Binary (bin)	Less than 2.5 MB in total for user credential data.	Generated or updated when credentials are added, modified or deleted.	Stored locally on the lock; reported to the cloud when users add, modify or delete credentials.	Smart Lock U600
Operation Logs and Events Data	Used to record device usage logs and report events.	Binary (bin)	0-48 kB per day.	In real time or when an event is triggered.	Stored locally and in the cloud.	Smart Lock U600
System Diagnostic and Log Data	Used for troubleshooting and reliability, including error triage, crash analysis and performance monitoring.	Binary (bin)	Less than 2 MB in total.	Only when errors occur or the user submits feedback.	Stored locally on the lock by default; uploaded to and stored in the cloud when the user chooses to submit the logs.	Smart Lock U600

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 submit a request to exercise your applicable rights at privacy@lumiunited.com. You may appeal a decision concerning your request by following the instructions provided with that decision. 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
Connection Data	Used to maintain the connection between the device and server.	Less than 8 kB per pairing operation; less than 4 kB per login or connection-maintenance operation.	Event-triggered.	Stored locally and in the cloud.	Aqara Home App
Device Configuration Data	Used to maintain device settings.	Less than 100 kB in total.	Generated when configured by the user.	Stored locally and in the cloud.	Aqara Home App
User-Credential Association Data	Used to identify which credentials are associated with each user, excluding credential contents.	Less than 2.5 MB in total for user credential data.	Generated or updated when credentials are added, modified or deleted.	Stored locally on the lock; reported to the cloud when users add, modify or delete credentials.	Aqara Home App
Operation Logs and Events Data	Used to record device usage logs and report events.	0-48 kB per day.	In real time or when an event is triggered.	Stored locally and in the cloud.	Aqara Home App
System Diagnostic and Log Data	Used for troubleshooting and reliability, including error triage, crash analysis and performance monitoring.	Less than 2 MB in total.	Obtained when diagnostic logs are accessed; cloud collection occurs when the user chooses to submit the logs.	Stored locally on the lock by default; uploaded to and stored in the cloud when the user chooses to submit the logs.	Aqara Home App

- **Access Method: You may request access to or retrieval of available product data by contacting privacy@lumiunited.com. You may appeal a decision concerning your request by following the instructions provided with that decision. 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
Device Operation and Status Data	Used for device connectivity and control, status synchronization, and security and performance assurance.	Approximately 50-200 KB per device per day; normally less than 1 MB per user per day.	Generated in real time or when the user operates the product through the App.	Stored by Aqara Home; cloud-stored data are subject to the retention arrangements stated below.	Aqara Home App
Account, Configuration and User Preference Data	Used for account and service delivery and for synchronizing or restoring device names, scenes and other user settings.	Approximately 30-80 kB per active user per day.	Generated in real time or when the user changes a configuration or preference.	Stored by Aqara Home; cloud-stored data are subject to the retention arrangements stated below.	Aqara Home App
System Diagnostic and Log Data	Used for troubleshooting, error analysis, crash analysis and performance monitoring.	Normally less than 5 kB per device per day.	Generated when an error occurs or when the user submits diagnostic information or feedback.	Stored by Aqara Home; cloud-stored data are subject to the retention arrangements stated below.	Aqara Home App

- **Access Method: You may request access to or retrieval of available related service data by contacting privacy@lumiunited.com. You may appeal a decision concerning your request by following the instructions provided with that decision. We will respond within seven days after receiving your email.**

Data Storage and Deletion Information

For users in the European Union, cloud-stored data are stored on servers located in Germany. Lock logs stored in the cloud are retained for six months. Cloud-stored device configuration data and user-credential association data are retained for as long as necessary to provide the relevant functions and services.

Device configuration data, user credential data, lock logs and diagnostic logs stored locally on the lock have no fixed retention period. They are cleared when the lock is reset to its factory

settings or overwritten on a rolling basis as storage space is reused. The actual retention period depends on usage and data volume.

To clear local data on the lock, restore the lock to its factory settings as described in the U600 user manual. This action is irreversible. To delete data stored in the cloud or by a related service, use the deletion function provided by that service, where available. If you cannot delete the data directly, contact privacy@lumiunited.com. Data may continue to be retained where required by applicable law or necessary for the establishment, exercise or defence of legal claims.

3. Third-Party Sharing

In general, Lumi Company will not share these data with third parties. Lumi Company 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
- As of the date of this disclosure, no other parties process the data described in this disclosure on Lumi Company's behalf. If this changes, we will update this 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 request that ongoing data sharing be stopped by contacting privacy@lumiunited.com. Where available, you may also use the relevant controls in Aqara Home App or the enabled integration.

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 information published by the European Commission, where available.

8. Trade Secrets Statement

The data covered by this disclosure include trade secrets held by Lumi United Technology Co., Ltd. Where data sharing involves those trade secrets, we will identify the protected data and agree proportionate confidentiality measures with the user in accordance with Article 4(6) of the EU Data Act. Such measures will not restrict the user's access rights except as permitted by applicable law.

9. Contract Duration and Termination

- Service Duration: 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 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. Your account is deleted or the related service is terminated at your request, in accordance with the applicable service terms;

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