

Information pursuant to Article 3, paragraphs 2 and 3 of Regulation (EU) 2023/2854 ("Data Act")

1. Introduction

On 12/09/2025, Regulation (EU) No. 2023/2854 of the European Parliament and of the Council (hereinafter "Regulation") became applicable in all Member States of the European Union, introducing harmonised rules on fair access to and use of data generated by a connected product or related service.

The aim of the Regulation is to allow users who own or use connected products (in the case of Cellularline S.p.A., Smart Watches) or who use related services (e.g. apps for remote control of connected devices) to access the data they co-create using connected products/related services.

This regulation applies exclusively to raw and pre-processed data generated by the use of a connected product or related service that is readily available to the data controller (i.e. the manufacturer of a connected product/provider of a related service), without this involving a disproportionate effort that goes beyond a simple operation.

2. Product data

Pursuant to Article 3, paragraphs 2 and 3 of the Regulation, Cellularline S.p.A., as the Data Controller of the data generated by its connected products and related services provided through apps, provides the user with the following information:

Product	Description	Type of data sent	Data format	Estimated data volume	Do you send data continuously and in real time?	Expected duration of data retention
BTIONWATCHK BTIONWATCHPRORK BTIONWATCHPROSK BTIONWATCHULTRAK BTMOMOWATCHSK BTMOMOWATCHRK	Smartwatch	Step counter	Hexadecimal	The default value is 1018 bytes, which is dynamically negotiated based on different mobile phones.	Yes	7 days on the watch; permanently saved on the associated app; 12 months on the cloud server
BTIONWATCHK BTIONWATCHPRORK BTIONWATCHPROSK BTIONWATCHULTRAK BTMOMOWATCHSK BTMOMOWATCHRK	Smartwatch	Heart rate	Hexadecimal	The default value is 1018 bytes, which is dynamically negotiated based on different mobile phones.	Yes	7 days on the watch; permanently saved on the associated app; 12 months on the cloud server
BTIONWATCHK BTIONWATCHPRORK BTIONWATCHPROSK BTIONWATCHULTRAK BTMOMOWATCHSK BTMOMOWATCHRK	Smart watch	Stress	Hexadecimal	The default value is 1018 bytes, which is dynamically negotiated based on different mobile phones.	Yes	7 days on the watch; permanently saved on the associated app; 12 months on the cloud server
BTIONWATCHK BTIONWATCHPRORK BTIONWATCHPROSK BTIONWATCHULTRAK BTMOMOWATCHSK BTMOMOWATCHRK	Smartwatch	Calories	Hexadecimal	The default value is 1018 bytes, which is dynamically negotiated based on different mobile phones.	Yes	7 days on the watch; permanently saved on the associated app; 12 months on the cloud server

3. Related service data

The products referred to in point 2 are smart devices that can connect to mobile devices and be managed via the "Cellularline-ION" and "MD TIME" apps. These apps are platforms for connecting and managing smart devices sold by Cellularline S.p.A., which allow you to:

- configure and manage devices;
- view and monitor data collected by devices.

4. How to access, retrieve and delete data

Users can access, retrieve or delete data generated by their connected devices/apps in the following ways:

by accessing the appropriate section of the app, where available;

by sending a direct request to the data controller, specifying the item code and the type of data requested.

Requests will be processed as quickly as possible in the order in which they are received. Any new requests from the same user may only be sent after a response to the previous ones has been received.

5. Purpose of data use and duration of the agreement:

Cellularline S.p.A. uses the data generated by connected products/related services for the following purposes:

- To ensure the proper functioning of connected devices and related services;

Cellularline S.p.A. does not transfer data to third parties. By purchasing a connected product and using the apps linked to it, the user accepts the above purposes of use.

The data use agreement remains valid as long as the user keeps their account active. Users can terminate the data use agreement at any time by deleting their accounts.

With regard to the processing of any personal data, as defined and governed by EU Regulation No. 679/2016, please refer to the specific information notice available at the link: <https://www.cellularline.com/en-it/informativa-sito-web>.

6. Data controller

The data controller is Cellularline S.p.A, with registered office in Via Grigoris Lambrakis 1/A 42122 Reggio Emilia (RE), Italy, in the person of its *pro tempore* legal representative.

Any requests related to the legislation in question should be sent via the single point of contact available at the link: <https://www.cellularline.com/en-it/contattaci>