



**Danfoss A/S**

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**Manufacturer’s Declaration of Compliance with Regulation (EU)  
2023/2854 (Data Act)**

**Danfoss A/S**  
Electric Heating

declares under our sole responsibility that the

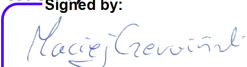

**Product category:** Zigbee Gateway

**Type designation(s):**

- 140F1166 DEVI Connect Zigbee gateway
- 140F1167 DEVI Connect Zigbee gateway

Covered by this declaration is in conformity with Regulation (EU) 2023/2854 (the Data Act), provided that the product is used in accordance with our instructions.

By purchasing this [connected product/related service], you acknowledge and agree that Danfoss will collect, access, and process data generated by the use of the [connected product/related service] in accordance with the Data Act and the contractual arrangements agreed between the parties. Data will be processed in compliance with applicable legal obligations.

Date: 2026.02.12 <b>Place of issue:</b> Grodzisk Mazowiecki, Poland	<b>Issued by</b> Signed by:  <b>Signature</b> 6555991D14AE402... <b>Name: Maciej Czerwiński</b> <b>Title: Compliance &amp; Innovation Engineer, Electric Heating</b>	Date: 2026.02.12 <b>Place of issue:</b> DK-6000 Kolding	<b>Approved by</b> DocuSigned by:  <b>Signature</b> 674290DFDC2645F... <b>Name: Jesper Aagaard</b> <b>Title: Director Innovation and PM, Electric Heating</b>
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Danfoss only vouches for the correctness of the English version of this document. In the event of the document being translated into any other language, the translator concerned must be liable for the correctness of the translation.

**ID No:** 600000832082      **Revision No:** AA

**a. Data generated by the [connected product/related service]**

- Device operation and connectivity data (device ID, firmware version, activation status, connection status, error logs).
- Registered account data: email, phone number, username, nickname, country code, language preference, time zone.
- Feedback data: email, phone number, feedback content, images, videos/logs.
- Mobile device information: model, IP address, OS version, app version, push ID, log files, network info.
- Usage data: visits, clicks, downloads, messages sent/received.
- Smart device data: device name, ID, online status, activation time, firmware version, upgrade history.
- Connection data: MAC address and connectivity information.

**b. Data access**

- Users can access or delete data via:
  - **App:** Me → Settings → Account and Security → Delete Account
  - **Web link:** <https://app-h5-us.iotbing.com/developerapp/account/deletion?appId=491497893>
- Users may export data or request sharing via app settings or by contacting Danfoss at **EH@danfoss.com**.
- Data sharing can be withdrawn at any time.

**c. Third-party access and data portability**

- Data is used by Danfoss to provide, maintain, and improve services.
- Anonymised data may be analysed internally (e.g. troubleshooting, usage patterns).
- Data is not shared with third parties unless required for service provision or by law.
- Users may request data portability/export via app settings or by contacting **EH@danfoss.com**.

**Note to the Customer**

For the DEVI Connect Zigbee Gateway and DEVI Connect App, Danfoss processes account data, connectivity data, device data, usage logs, and connection information in compliance with the EU Data Act (Regulation (EU) 2023/2854). Users can delete their accounts and associated data directly in the app or via the deletion website. Anonymized logs may be retained for troubleshooting and legal compliance. Log data is automatically deleted after 7 days.

Information to the User, in accordance with Article 3(2) of Data Act:

Type, format, estimated volume of product data generated	The product generates device operation and connectivity data (device ID, firmware version, activation status, connection status, error logs). Data is generated continuously and in real-time.
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<p>The product generates data continuously and in real-time</p>	<p>Yes.</p>
<p>The product stores data on-device or on a remote server. Include, where applicable, the intended duration of retention</p>	<p>Data is stored locally on the device for operation purposes. Certain data may be transferred to the DEVI Connect App and stored on Tuya-operated servers, which are documented to be GDPR compliant and geographically isolated. Further details are available in Tuya’s data center documentation: Tuya Data Center Information (<a href="https://developer.tuya.com/en/docs/iot/oem-app-data-center-distributed?id=Kafi0ku9I07qb">https://developer.tuya.com/en/docs/iot/oem-app-data-center-distributed?id=Kafi0ku9I07qb</a>). Retention is in accordance with the App’s retention policy.</p>
<p>The user may access, retrieve or, where relevant, erase the data in the following way. Include technical means to do so as well as their terms of use and quality of service.</p>	<p>Users can access or delete account data via:</p> <ul style="list-style-type: none"> <li>• Option 1: App → Me → Settings → Account and Security → Delete Account</li> <li>• Option 2: Account deletion link: <a href="https://app-h5-us.iotbing.com/developerapp/account/deletion?appId=491497893">https://app-h5-us.iotbing.com/developerapp/account/deletion?appId=491497893</a></li> </ul>

Information to the User, in accordance with Article 3(3) of Data Act:

<p>The nature, estimated volume and collection frequency of product data including arrangements for the user to access/retrieve the data including the data holder’s data storage arrangements and duration of retention</p>	<p>The app collects:</p> <ul style="list-style-type: none"> <li>• Registered account data: email, phone number, username, nickname, country code, language preference, time zone.</li> <li>• Feedback data: email, phone number, feedback text, images/videos/logs.</li> <li>• Mobile device information: model, IP, OS, app version, push ID, log files, network info.</li> <li>• Usage data: visits, clicks, downloads, messages sent/received.</li> <li>• Smart device basic info: device name, ID, status, activation time, firmware version, upgrade history.</li> <li>• Connection data: MAC address and connectivity information.</li> </ul> <p>Retention: Personal data is deleted when the account is deleted, with the exception of anonymised feedback logs and data legally required to be retained. Log information is automatically deleted after 7 days.</p>
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The nature, estimated volume and collection frequency of related service data including arrangements for the user to access/retrieve the data including the data holder’s data storage arrangements and duration of retention	Service data includes usage logs, connection attempts, and error messages. Collected continuously during use. Retained for troubleshooting and anonymised analysis.
Whether data is used by the data holder and for which purposes, and whether data is shared with one or more third parties for purposes agreed upon with the user;	Data is used to provide, maintain, and improve the service, ensure connectivity with smart devices, enable troubleshooting, and analyse anonymised usage patterns. Data is not shared with third parties unless required for service provision or by law.
The identity of the data holder (trading name, address of establishment, other processing parties where applicable)	Nordborgvej 81 6430 Nordborg, Denmark Contact: EH@danfoss.com
Contact information of the data holder	EH@danfoss.com
How the user can request data sharing with a third party and where applicable end the data sharing	Users may request data export or sharing through the App settings or by contacting Danfoss at EH@danfoss.com . Data sharing can be withdrawn at any time via the same channels.
The right of the user to file a complaint about an infrigent with the competent authority	Users may lodge a complaint with their national Data Protection Authority (DPA).
Whether the data holder is also trade secret holder and, if not, what is the identity of the trade secret holder	Danfoss A/S is both the data holder and the trade secret holder of proprietary service information.
The duration of the contract between the user and prospective data holder as well as the arrangement for contract termination	The contract remains valid as long as the user maintains a registered account. Users can terminate by deleting their account (see deletion options above).

If you require further information or clarification, please contact Danfoss at **EH@danfoss.com**.