

Data Transparency Statement – Regulation (EU) 2023/2854 (Data Act)

This document has been prepared to fulfill the information obligations arising from Regulation (EU) 2023/2854 of the European Parliament and of the Council (Data Act) concerning connected products and related services.

The document is of a universal nature and may be used on various marketplaces (including Allegro, Amazon, eBay).

1. Scope of the document

The document applies to connected products sold under the B2C model, in particular:

- Android smartphones
- iPhone smartphones with iOS
- Android tablets
- iPad tablets with iPadOS

The document covers new, used, display/ex-demo, and refurbished products.

2. What are connected products and related services

Connected products are devices capable of communicating with other devices or networks in order to generate, collect, or transmit data.

Related services are digital services directly linked to the functioning of a connected product, such as the operating system, mobile applications, user accounts, or cloud services.

3. Types of data generated by the products

The connected products covered by this document may generate the following categories of data:

- personal data (e.g. user account data, system identifiers)
- technical and diagnostic data (e.g. system version, configuration, error reports)
- data relating to product usage (e.g. activity time, features used)
- location data (if the user has given consent)
- environmental and network data (e.g. information about network connectivity)

4. Estimated volume and nature of generated data

The scope and volume of data depend on how the device is used and on the privacy settings selected by the user.

Data may be generated both as a result of direct user interactions and through system processes running in the background, including in standby mode.

5. Data format and real-time generation

Data is generated in digital formats appropriate for Android, iOS, and iPadOS systems. Devices may generate data in real time if the relevant system functions or applications are enabled.

6. Place of storage and data retention period

Data may be stored locally on the device and—depending on the user’s settings—on remote servers of operating system providers (Google, Apple) or other application providers. The data retention period depends on the type of data and the individual settings of the user account.

7. User access to data

The user may access data via the device’s system settings, the user account (Google or Apple ID), and the portals or applications of service providers. Access to data may require logging into the account and accepting the applicable terms of use.

8. Data deletion

The user may delete data by performing a factory reset of the device, removing the user account from the device, or managing data in the account settings. Detailed information is available in the documentation of the operating systems.

9. Role of the seller

The seller does not have access to the data generated by connected products during their use and does not process usage data. The data controller remains the end user as well as the providers of operating systems and related services (in particular Google and Apple).

10. Sharing data with third parties

Data may be shared with third parties solely in accordance with the user’s decisions and the privacy policies of operating system and application providers. The seller does not transfer data to third parties.

11. Right to lodge a complaint

The user has the right to lodge a complaint with the competent supervisory authority in the event of a breach of obligations arising from Regulation (EU) 2023/2854 (Data Act).

12. Final information

This document is of an informational nature and has been prepared to ensure transparency regarding data processing by connected products, in accordance with applicable EU law.