

EU Data Act Notice

Version: v1.0

Effective Date: 2026-04-01

This Notice is provided in accordance with the EU Data Act (Regulation (EU) 2023/2854) (the "EU Data Act").

1. Connected Products Overview

Connected Product means an item that obtains, generates or collects data concerning its use or environment and that is able to communicate product data via an electronic communications service, physical connection or on-device access, and whose primary function is not the storing, processing or transmission of data on behalf of any party other than the user.

We offer the following connected products:

- Feature phone

The functions of these connected products, as well as details regarding the data they generate and how it is handled, are described in the following sections of this notice.

2. Data Generated/Collected by Connected Products

Data Name	Data Description	Data Source	Data Format	Estimated Volume	Continuous	Real-time	Storage Location	Storage Duration
					Generation			
User contact data (contact name, contact number)	product data	Daily communication and usage by end users	.bin	about 10KB-300KB	Yes		Device-RAM	Equipment lifecycle
User SMS data (SMS content,	product data	Daily communication and usage by end	.bin	About 1120 bytes per time	Yes		Device-RAM	Equipment lifecycle

recipient, sending time)		users					
User call data (call number, call duration, call type)	product data	End users' daily viewing and usage	.bin	about 1KB~10KB	Yes	Device-RAM	Equipment lifecycle
User browser data (bookmarks, history, offline interface)	product data	End users' daily viewing and usage	.bin	about 1KB~5KB	Yes	Device-RAM	Equipment lifecycle
System operating status (remaining power)	product data	End users' daily viewing and usage	.bin	about 1KB~5KB	Yes	Device-RAM	Equipment lifecycle
Time and Time Zone/Synchro nization Status (NTP Server)	product data	End users' daily viewing and usage	.bin	about 1KB~5KB	Yes	Device-RAM	Equipment lifecycle
Bluetooth data (Bluetooth status, Bluetooth connection, connected	product data	Bluetooth data is mainly used for connection management, device authentication, function calling,	.bin	about 1KB~5KB	Yes	Device-RAM	Equipment lifecycle

device information)		performance optimization, and user experience improvement, while ensuring that data is not accessed by unauthorized applications.					
Camera data (camera resolution, camera frame rate, camera filters)	product data	End users' daily use	.bin	about 1KB-5KB	Yes	Device-RAM	Equipment lifecycle
Audio data (speaker volume, speaker equalizer, speaker status)	product data	End users' daily use	.bin	about 1KB-5KB	Yes	Device-RAM	Equipment lifecycle
Screen display data (animation effects, wallpaper settings, device status display,	product data	End users' daily use	.bin	about 1KB-5KB	Yes	Device-RAM	Equipment lifecycle

screen saver							
status display,							
brightness,							
sleep time)							

Data means any digital representation of acts, facts or information and any compilation of such acts, facts or information, including in the form of sound, visual or audio-visual recording.

3. User Data Access, Erasure and Portability

Individuals or legal entities using our Connected Products hereinafter referred to as ("Users") have the right, in accordance with the EU Data Act, to request access to, erasure of, or portability of data generated/collected by Connected Products.

These requests can be submitted via [9. Contact and Data Request Channel]

4. Data Sharing and Compliance with Requests for Data

Data generated by our Connected Products may be shared with third parties under Articles 4 to 7 of the EU Data Act, applicable to the following requesters:

4.1 Business-to-Business (B2B) Access Requests

Exclusively based on the User's explicit consent;

Contracts shall specify: Purpose limitation, Confidentiality obligations, Data security measures, Prohibition of misuse.

4.2 Business-to-Government (B2G) Access Requests

Based on Article 14-18 of EU Data Act, data may be shared with public

authorities:

Permitted under Article 15 for emergencies or legitimate public tasks (e.g., natural disasters, public safety, pandemics);

Data transmitted via encrypted secure channels with strict purpose binding;

Government entities must submit formal written requests with access logging;

Data minimisation principle applies to all shared datasets.

4.3 Third Parties Requests Submission

Third parties may submit formal requests through [9.Contact and Data Request Channel].

5. Data Security and Protection Mechanism

To ensure security of data generated by Connected Products manufactured by LOGICOM, we implement the following technical and organizational safeguards throughout the processes of data transmission, storage, and access:

- Implement full security encryption during storage and transmission to prevent data from unauthorised access, use or disclosure (such as by using SSL to encrypt many Services).
- Regularly review practices regarding data collection, storage and processing (including physical security measures) to prevent unauthorised access to or tampering with our various systems and data.
- Establish access rights management mechanism to authorize only necessary personnel to access data.
- Conduct security and privacy protection training, testing and other activities to enhance employee awareness of and proficiency in data protection.
- Use international and industry-recognised standards to protect your data

and actively pursue relevant security and privacy protection accreditation.

6. Interoperability Notes

We ensure that the recipient can process the data in a structured, commonly used and machine-readable format in order to comply with the interoperability requirements of Articles 33 of the EU Data Act.

7. Data Use Restrictions and Prohibited Purposes

Without LOGICOM's express written authorization or, unless legally required, data shall not be used for the following purposes:

- Development of competing products;
- Reverse engineering of algorithms;
- Targeted advertising or profiling of users.

Any breach of these restrictions may result in legal consequences and revocation of access.

8. Contact and Data Request Channel

Service channel	Email
China	info@logicomcn.com
France	p.amette@logicom-europe.com

9. Policy Updates

This policy will be updated regularly based on legal requirements and business needs. All updates will be announced through our official website and related channels.