

This document is issued in accordance with **Regulation (EU) 2023/2854 of the European Parliament and of the Council of 13 December 2023 on harmonised rules on fair access to and use of data** (hereinafter referred to as the 'Data Act'), particularly Article 3(2), which establish the obligation to provide users with clear and comprehensible information on the data generated by connected products prior to the conclusion of a purchase, rent, or lease contract.

### 1. Scope of Products

This disclosure applies to the following classical connected products developed and marketed by EnOcean GmbH without any particular order:

PTM 216x	PTM 215x	PTM 210x	PTM 202x	PTM 535x
EOSWx	EMCSx	ETHSx	EMDCx	EOSCx
STM 329	STM 330	STM 331	STM 332	STM 333
STM 350	STM 550x	EPACx	EOSDx	Easyfit    Rocker    Wall Switches & Pads

### 2. Type, Format, and Estimated Volume of Product Data

- 2.1. The aforementioned products generate environmental and activity-related sensor data (e.g., motion detection, temperature readings, occupancy signals), transmitted in the form of radio telegrams.
- 2.2. Data is broadcast in open and standardised formats, including but not limited to the EnOcean Radio Protocol (ERP), Bluetooth Low Energy (BLE), and Zigbee.
- 2.3. typical annual data volume per device is estimated to be less than 5 megabytes (MB) under standard operational use
- 2.4. The scope and format of data output are statically defined at the firmware level.

### 3. Continuous and Real-Time Data Generation

- 3.1. The devices generate data periodically, based either on user-defined time intervals (typically every 2 to 15 minutes) or event-based triggers (e.g., door open/close, motion detection).
- 3.2. Data is transmitted immediately, allowing real-time access without being stored on the device.

### 4. Data Storage and Retention

- 4.1. The products referenced herein are stateless and do not possess local or remote data storage functionality. All data is emitted in real time and not retained post-transmission.
- 4.2. EnOcean GmbH solely determines the structure and specifications of data output and communication protocols. However, it neither stores, processes, nor otherwise accesses user-generated data following the sale of the product.

- 4.3. In light of the foregoing, EnOcean GmbH does not qualify as a "data holder" within the meaning of Article 2(8) of the Data Act

## **5. User Access, Retrieval, Sharing and Erasure**

- 5.1. End users may access transmitted data directly by means of industry-standard receivers, including but not limited to USB dongles, IoT gateways, and compatible building automation systems.
- 5.2. As no data is stored by the device or by EnOcean GmbH, retrieval, erasure, or export functionality is not applicable at the device or provider level.
- 5.3. Users retain full control over the storage, processing, or deletion of received data within their own infrastructure environments.
- 5.4. The data transmitted by these devices does not contain trade secrets for EnOcean. All protocols are open and standardized.
- 5.5. No data is collected, retained, or shared with third parties by EnOcean GmbH as part of the operation of the listed devices.

## **6. Legal Identity and Communication**

- 6.1. The provider is EnOcean GmbH, incorporated in Germany.
- 6.2. EnOcean GmbH is located at:  
Kolpingring 18a  
82041 Oberhaching
- 6.3. Users may contact EnOcean GmbH through designated support channels as stated in the service contract or via the company's website.
- 6.4. In accordance with Article 3(3)(g) of the Data Act, users have the right to lodge complaints with the competent authority regarding suspected non-compliance with data access or usage obligations.

This document serves as part of EnOcean Group's compliance with the Data Act's transparency and disclosure obligations. It does not override or substitute the specific contractual terms applicable to the user's purchase or use of the product. Updates may be issued as required by legal or operational developments.

September 12, 2025



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