



LUG Light Factory Sp. z o.o.
Producent Profesjonalnych Rozwiązań Oświetleniowych LED



INFORMATION IN ACCORDANCE WITH ARTICLE 3(2) OF THE DATA ACT

This information clause has been prepared to fulfil the obligations arising from Article 3(2) of 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, and amending Regulation (EU) 2017/2394 and Directive (EU) 2020/1828 ("Data Act").

Its purpose is to provide the user with clear and comprehensible information regarding the type, format, quantity, and conditions of access to the data generated by the connected product.

1. General Provisions

- 1.1. This information clause sets out details regarding data generated by the connected ebloc LTE controller ("Connected Product").
- 1.2. The manufacturer of the Connected Product, and simultaneously the entity providing this information, is LUG LIGHT FACTORY Sp. z o.o., with its registered office in Zielona Góra at 11 Gorzowska Street, 65-127 Zielona Góra, entered into the Register of Entrepreneurs of the National Court Register under KRS number 0000290498 by the District Court in Zielona Góra, 8th Commercial Division of the National Court Register, holding tax identification number NIP 9291785452, statistical number REGON 080212116, and share capital of PLN 29,000,000.00 ("Connected Product Seller").
- 1.3. The User may contact the Connected Product Seller via the following means of communication:
 - 1.3.1 e-mail address: lug@lug.com.pl;
 - 1.3.2 telephone number: +48 68 45 33 200;
 - 1.3.3 contact form available at: <https://www.luglightfactory.com/en/support/forms/contact>
- 1.4. The Connected Product Seller informs that, in relation to the Connected Product, an associated service - Urban Central Management System (CMS Urban) ("Associated Service") - is provided by BIOT Sp. z o.o. with its registered office in Zielona Góra ("Associated Service Provider"). Detailed information regarding the Associated Service will be provided in a separate information clause, compliant with Article 3(3) of Regulation (EU) 2023/2854 (the Data Act), delivered by the Associated Service Provider.
- 1.5. The User has the option to save the content of this information clause, for example by downloading it as a PDF file, to ensure future access. It is also available at <https://www.luglightfactory.com/en/download/documents>

2. Type, Format and Quantity of Generated Data

- 2.1. The Connected Product is capable of generating the following types of data ("Connected Product Data"):
 - 2.1.1 data concerning:
 - 2.1.1.1. the status of the lighting fixture,
 - 2.1.1.2. energy consumption and power drawn,
 - 2.1.1.3. power supply parameters of the fixture,
 - 2.1.1.4. alerts,
 - 2.1.1.5. information on significant changes in operating status,
 - 2.1.1.6. vibrations and impacts to the lighting column,
 - 2.1.1.7. intensity of external lighting,
 - 2.1.1.8. movement of objects (users of public spaces within the area associated with the installation point of the Connected Product);



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- 2.1.2. device availability data in the system.
- 2.2. Connected Product Data is generated in binary data format, which is transmitted to the Associated Service immediately (for data containing alert information or significant changes in the operating parameters of the device), as well as within regular hourly reports presenting the status of the device, even if no changes have occurred. All data - once transmitted to the Associated Service - are deleted from the Connected Product. Consequently, raw data is not available to the user; however, the full informational value of the raw data is processed within the Associated Service, which uses standard data formats.
- 2.3. The estimated amount of Connected Product Data generated is:
 - 2.3.1. 1 MB of data per month - for the data described in items 2.1.1.1 to 2.1.1.8;
 - 2.3.2. approximately <4 MB per month - for availability data referred to in item 2.1.2 (used for display on the map and not stored).

3. Data Generation Method

The Connected Product is not capable of generating data continuously. The Connected Product generates data:

- 3.1. in real time - for the data described in items 2.1.1.4 to 2.1.1.6,
- 3.2. at its own interval (according to programmed reporting frequency), specifically:
 - 3.2.1. for the data described in item 2.1.2, no less than 6 times per hour,
 - 3.2.2. for the data described in items 2.1.1.1 to 2.1.1.8, typically once per hour,

4. Data Storage

- 4.1. The Connected Product is able to store Connected Product Data:
 - 4.1.1. on the device: no, except for:
 - 4.1.1.1. cryptographic data,
 - 4.1.1.2. data in items 2.1.1.1 to 2.1.1.8 - in case of lack of connectivity with the servers of the Associated Service.
 - 4.1.2. on a remote server: yes (server of the Associated Service).
- 4.2. The intended retention period for data is:
 - 4.2.1. on the device:
 - 4.2.1.1. up to 7 days - for data indicated in items 2.1.1.1 to 2.1.1.8 (data is stored locally only in case of loss of connection with the Associated Service server and is automatically deleted after transmission to the Associated Service servers),
 - 4.2.1.2. up to 1 hour - for data indicated in items 2.1.1.1 to 2.1.1.8 in the case of an active connection with the server - i.e. until it is sent to the Associated Service,
 - 4.2.2. on a remote server: in accordance with the contract regarding the Associated Service, and if the contract does not specify data retention, the retention period is 3 years. The retention period will be counted from the launch of the Associated Service in accordance with the terms resulting from the contract regarding the Associated Service.

5. Access, Downloading and Deletion of Data

- 5.1. The user may access Connected Product Data via the Associated Service—after logging into the CMS Urban system (each data group is available in the relevant tabs).
- 5.2. The user cannot download Connected Product Data directly. For cybersecurity reasons, data generated by the Connected Product can only be downloaded via the Associated Service.
- 5.3. The user cannot delete Connected Product Data.
- 5.4. Connected Product Data may be used by the user for their own purposes, in particular for monitoring the status of connected lighting devices, optimising their operation, analysing energy consumption, and ensuring safety and comfort in public spaces managed via the CMS Urban system.



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Data may also be used for other lawful or contractually agreed purposes. The user may not use the data to develop a connected product that competes with the Connected Product, nor provide the data to third parties for this purpose. The user may not use the data to obtain information about the economic situation, assets, and production methods or activities of the Connected Product Seller and - where applicable - the Associated Service Provider, which could weaken their commercial position. The user may not use coercive measures or exploit vulnerabilities in the technical infrastructure to gain access to the data.

- 5.5. The quality of service for accessing Connected Product Data depends, among other things, on the power supply to the Connected Product, the availability and load of the transmission network, and the load on the servers of the Associated Service.