Information sheet according to the EU Data Act & GDPR

Transparency and Data Processing Statement for Connected Products.

This information sheet serves to comply with the legal information obligations in accordance with the EU Regulation (EU) 2023/2854 (Data Act) and the General Data Protection Regulation (EU) 2016/679 (GDPR). It informs you about the collection, use, storage and your rights with regard to product data and personal data before purchase and when commissioning.

1. Model designation / product identification

Product Name: Tracer 2T

Item number:	EAN code:
BEASH-2T-W	9120124820429

2. Controller & Data Protection

Manufacturer: Beafon Mobile GmbH, Enzing 4, 4722 Peuerbach

Email: office@beafon.com

Web: www.beafon.com

Data protection officer: Reinhard Handlgruber can be reached at +43 7276 2670 0

Competent supervisory authority: Austrian Data Protection Authority, Barichgasse 40–42, 1030 Vienna, Austria

Web: www.dsb.gv.at

3. What data is generated and collected?

The product collects the following data categories in conjunction with the associated app "Beafon Home". (app development, support):

- **Product Data & Telemetry Data (Data Act):** Device status, battery status, connection and network data, IP address, MAC address, signal strength.
- **Estimated megabyte consumption per minute for live streaming on the mobile network:**

Resolution	10 minutes	30 minutes	1 hour
3 MP	115 - 235 MB	350 - 700 MB	0.7 - 1.4 GB

- **Smart home sensor data & live streams:** live video stream, live audio data (2-way audio: listening and talking), live temperature display, triggering alarms/notifications automatically.
- **Optional recordings (cloud or SD card):** Video material and audio recordings, provided that the optional cloud storage or a local storage option is booked and used by the user for a fee/active fee.

4. Legal Basis & Purposes of Data Processing

The processing of your data is carried out for the following purposes and on the basis of the following legal bases:

- Performance of the contract (Art. 6 para. 1 lit. b GDPR & Data Act): Provision of the core functions of the connected product, device control, firmware updates and provision of the app functions.
- Explicit consent (Art. 9 para. 2 lit. a in conjunction with Art. 9 para. 2 lit. a): For the use of the optional, fee-based cloud storage for recording video and audio data as well as for voluntary interfaces to third-party platforms.
- Note on functionality: The pure use of the live broadcast (video, audio, temperature) takes place as part of the performance of the contract. Non-booking or revocation of the cloud storage does not restrict the live functions of the device, but only ends the cloud recording.

5. Who gets access to this data / recipients

- App Providers & Technical Service Providers: To provide the app infrastructure, support, and software updates.
- "To provide the app infrastructure (Bea-fon Home), the user accounts (registration, login) and the live broadcasts, we use the technical platform of Tuya Inc. as a technical processor."
- Server location & data security: User and system data for users within the EU is stored on ISO/IEC 27001 certified servers within the European Economic Area (EEA, Frankfurt am Main data center, Germany).
- Transfer to third countries: For any administrative support or international routing processes, the level of data protection is ensured by the conclusion of EU standard contractual clauses (SCCs in accordance with Art. 46 para. 2 lit. c GDPR) in conjunction with end-to-end encryption
- Third-Party Providers (e.g., Cloud Services, Third-Party Platforms): Provided solely upon your explicit, active release/activation.

It will not be passed on to other unauthorized third parties.

6. Your rights under the EU Data Act & GDPR

In accordance with the applicable laws, you have the following rights, free of charge:

- Right to Data Access & Portability (Data Act & GDPR): You have the right to access and export any data generated by you or your device (including raw and processed sensor data) at any time in a structured, commonly used and machine-readable format (such as CSV or JSON) directly via the App, free of charge.
- Right to transfer data to third parties: You can request that this data be transmitted directly to a third party designated by you, if this is technically feasible.
- Right of withdrawal: A consent given can be revoked at any time with effect for the future via the app settings.
- Right to deletion and correction: You can arrange for the correction of incorrect data or the complete deletion of all stored data at any time directly in the app or via support. Exceptions only exist in the case of legal retention obligations or the protection of trade secrets.
- Right to lodge a complaint: You have the right to lodge a complaint with the competent supervisory authority.

7. Machine readability and data export (compliance with Data Act Art. 4)

The manufacturer ensures that the data collected about the product can be exported to the user at any time via the associated app in a directly machine-readable standard format (CSV / JSON). The provision of the data is completely free of charge for the user.

Where can you find this function in the app ("Bea-fon Home")?

You can access your data and export options directly in the app under: Settings → Privacy Policy Management → Personal data export as well as for device data directly via Export → device data. Note on our cameras: Since our smart home cameras do not store any permanent history or sensor data on our servers in standard mode, but only transmit it directly to your device as a live stream (including live temperature and 2-way audio), no historical product data is required for export in live mode. If you use the optional cloud storage, you can manage and download your recordings directly in the app.

8. Data Security, Retention and Deletion Policy

Encryption: All data is stored encrypted during transmission (transport encryption via TLS/SSL) and at rest.

Location: Optional in cloud services that you have enabled.

Deletion: After deleting your user account, all personal and device-related data will be deleted from the servers immediately, unless there are any statutory retention obligations to the contrary.

Differentiated deletion and retention matrix (Art. 13 para. 2 lit. a GDPR):

Live stream data: **(Video/Audio)**	**Volatile RAM**	Will be discarded immediately after transmission; no storage.
Telemetry & Server Log Files:	EWR Server Infrastructure	Automatic anonymization or deletion after 30 days at the latest.
Cloud Recordings: **(Optional)**	Cloud Storage	According to the fare booked (e.g. 7, 14 or 30 days rolling) or manual cancellation.
User Account & Profile Data:	App Server Infrastructure	Immediately after account deletion in the app, at the latest within 30 days.

9. Notes to Traders

Retailers are legally obliged to make this information sheet available to the end customer in digital or printed form before or at the latest when purchasing (or handing over the networked product).

10. Validity and Updates

This transparency declaration corresponds to the current technical and legal status. Bea-fon Mobile GmbH reserves the right to adapt this declaration in the event of technical developments or changes in the legal situation. The current version can be accessed at any time under www.beafon.com and in the Bea-fon Home app. The statutory rights of consumers remain unaffected by this.