EU Data Act – Customer information for networked heaters

1. Purpose of this document

This information serves to fulfill the transparency obligations under the EU Data Act (Regulation (EU) 2023/2854). It describes the type, scope, and use of the data generated by the operation of the connected heater.

2. Product

Product: WDH-NDU22WT convection and heating radiator
Manufacturer: Aktobis AG, Borsigstr. 20, 63110 Rodgau, Germany
Connectivity: Wi-Fi (2.4 GHz)
App: Tuya Smart or Smart Life app (generic app from the Apple App Store / Google Play Store) Brief description: Mobile convection and heating radiator with two heat settings (1,100 W / 2,200 W), digital thermostat (5 °C to 45 °C), timer (1–24 h), touchscreen/LED display, and remote control. It can also be controlled via Wi-Fi using Tuya/Smart Life.

3. What data is generated?

The following data may be generated when the device is in operation:
- Sensor data/control data: measured or used temperature values (thermostat), target temperature
- Operating data: On/off status, heating level (1,100 W / 2,200 W), operating mode (e.g., ECO/sleep mode), timer settings
- Device status data: Error/protection status (e.g., overheating protection), child lock status
- Device data: Device ID, firmware version, model name
- Connection data: Wi-Fi connection status, cloud connection status, log/diagnostic information

This data is transmitted to the Tuya IoT platform via the integrated Wi-Fi/IoT function when the app/cloud functions are used.

4. Who can access the data?

- End users: Access via the Tuya Smart/Smart Life app (display/control)
- Manufacturer/distributor: No direct access to the user's personal account data via the Tuya app, unless separate manufacturer cloud/app services are used
- Platform provider: Tuya as operator of the IoT platform (app/cloud)
- Third parties: Only if authorized by the user within the Tuya app (e.g., smart home integrations/voice assistants)

5. How can users access their data?

Users primarily access device data and device status via the Tuya Smart/Smart Life app. The app provides status information, control options, and, where applicable, usage/history information.

Note: Direct export (e.g., CSV/JSON) or API access depends on the functions of the Tuya platform and the app functions used by the user.

6. Data use and purpose limitation

The data is used for:
- Provision of product functions (remote control, timer, modes)
- Control/monitoring of operation (thermostat, protective functions)
- Fault diagnosis and operational stability
- Technical improvement of the platform by Tuya (platform-specific)

If Tuya processes data for other purposes (e.g., analysis/marketing), this is done in accordance with the user's settings and Tuya's privacy policy.

7. Data transfer to third parties

Data will only be transferred to third parties if the user activates corresponding integrations within the Tuya app (e.g., voice assistants or smart home systems).

8. Protection of trade secrets

Internal technical information (e.g., design details, control algorithms, production-related data) may constitute trade secrets and are not subject to disclosure, insofar as this is permitted under the EU Data Act.

9. Data security

Data transmission between the app, device, and Tuya platform is typically encrypted. Access is secured by user accounts and permissions in the app. Further technical and organizational measures are based on the specifications of the platform provider (Tuya) and the security functions activated by the user/platform.

10. Contact

Contact point for inquiries in accordance with the EU Data Act:
Company: Aktobis AG
Email info@aktobis.de
Address: Borsigstr. 20, 63110 Rodgau, Germany

Note: For app/account-related issues (e.g., Tuya account), the support team of the app/platform provider (Tuya) may also be relevant.