

In accordance with Article 3 of Regulation (EU) 2023/2854 (the "Data Act"), this document provides information on how we manage and make available the data generated by the use of our connected product (IoT hardware) and related services (control and supervision software applications).

WHICH DATA WILL BE MANAGED

The following section provides the information necessary to understand which data will be generated, collected, and used through the use of your connected product and related services.

These details are provided prior to concluding the contract to ensure transparency and to enable your full control over the digital information generated by the use of the device.

CONNECTED PRODUCT 4box

Series	Functions	Nature of Product Data	Data Characteristics	
S Series	Smart relay actuators	Device schedules, Wi-Fi network, geographic location, email	Estimated Volume	<100 kB
			Generation frequency	At each communication with the server
			Storage Location	On the connected product
			Retention Period	10 years
			Data Access	Via the App only
			Export Methods	N/A
			Export Format	N/A
S Series	Smart relay actuators	Device schedules, Wi-Fi network, geographic location, email	Estimated Volume	<100 kB
			Generation frequency	At each communication with the server
			Storage Location	On the connected product
			Retention Period	10 years
			Data Access	Via the App only
			Export Methods	N/A
			Export Format	N/A

RELATED SERVICES 4box

Service Name	Purpose of Use	Nature of Related Service Data	Service Characteristics	
4box S Series	Configuration and switching	Energy consumption and usage performance data, both aggregated and granular.	Estimated Volume	Variable volume based on the number of devices and optimized for consolidations.
			Collection Frequency	Every 15 minutes, with daily, weekly, etc. consolidation.
			Connection Type	Wi-Fi
			Storage Location	Primary application database in the cloud
			Retention Period	Stored for 1 year
			Data Access	Public API (api.4box.it/api/stats) accessible to the user via App or Dashboard.
			Export Methods	Upon request via contact form
			Export Format	Not provided
			Application Required	NO (*)
			Internet Connection Required	YES
4box S Series	Configuration and switching	Raw telemetry data linked to the product serial number and anonymized for the user.	Estimated Volume	Significantly higher than consumption data (no preliminary aggregation).
			Collection Frequency	Continuous real-time.
			Connection Type	Wi-Fi
			Storage Location	Time Series Database in the Cloud
			Retention Period	Store for 2 months
			Data Access	Exclusively for technical staff via Grafana or admin panels.
			Export Methods	Not provided
			Export Format	Not provided
			Application Required	NO (*)
			Internet Connection Required	YES

(*) App usage recommended to optimize product functionality

CONNECTED PRODUCTS

HOW TO ACCESS DATA

Users have the right to access the data generated by the use of the connected product and related services.

Users may access data as follows:



- Through the User interfaces (e.g. the App) indicated in the table above, where available;
- By submitting a request to Finder through the contact form available at the following link:
<https://www.findernet.com/en/worldwide/data-transparency-accessibility/>

RELATED SERVICES

SERVICE DATA HOLDER



Data Holder: **FINDER S.p.A. con unico socio**
P.IVA: **IT05732610018**
Address: **10040 Almese (TO) Via Drubiaglio 14**

COMMUNICATION WITH THE DATA HOLDER



Users contact form at:
<https://www.findernet.com/en/worldwide/data-transparency-accessibility/>

DATA SHARING UPON USER'S REQUEST

Users have the right to request that data generated by the use of connected product and related services be shared with a third party of the User's choice.



In accordance with Article 5 of the Data Act, User may request data sharing by submitting a request to Finder through the contact form provided in this information notice.

Finder undertakes to respond to User requests without undue delay, providing information on the procedures and estimated timeframe for the data sharing process.

DURATION OF THE CONTRACT

The duration of the contract for the related service coincides with the period of the User's use of the service.



Users may withdraw from the service at any time by deleting their account:

- Through the dedicated function within the App, where available;
- Upon request to the Data Holder, through the contact form provided in this information notice.

PERSONAL DATA

Information on the processing of data that may identify the User (personal data) that may be collected through the App (the related service) is available in the privacy section within the App Store.



The provision of access to personal data to the User or to third parties, based on the rights provided by the Data Act, will only take place if there is a valid legal basis under the GDPR (Reg. EU 2016/679).

If the User exercising the right to access or share data under the Data Act is not the Data Subject, personal data will only be available after anonymization or pseudonymization, or by transmitting only the personal data relating to that specific User, in order to protect the rights of other data subject.

TRADE SECRETS

Data access is intended to apply to consumption and operational data of connected products and related services.

Finder is the owner of the trade secrets, intellectual property rights, and the algorithmic know-how underlying the routing logic and the complex data storage structures of the generated data. The absolute protection of these secrets is necessary to maintain the infrastructure.



In the event of a request for data communication or sharing with third parties, Finder may require the signature of a Non-Disclosure Agreement (NDA) or the implementation of specific technical measures to protect such secrets.

Finder reserves the right to limit or fully suspend data sharing in cases of high risk of serious economic damage, if the systems detect clear attempts at reverse engineering, unauthorized scraping, or actions intended to expose the network to serious cybersecurity vulnerabilities. In such exceptional scenarios, the suspension will be followed by the definition of rigorous technical and organizational measures agreed upon to restore the service securely.

USE OF DATA BY THE DATA HOLDER

The Data Holder does not use non-personal data generated by the User's devices for commercial, analytical, or profiling purposes.



Anonymous telemetry information will be used in aggregate form exclusively for preventive diagnostics, infrastructure optimization, firmware debugging, and continuous improvement of IoT network cybersecurity.

The Data Holder does not share this data with third parties for commercial purposes other than for the execution of the contract.

USER RIGHTS UNDER DATA ACT

Users may exercise their rights under the Data Act by submitting a request to Finder through the contact form available at the following link:



<https://www.findernet.com/en/worldwide/data-transparency-accessibility/>

Users have right to lodge a complaint alleging an infringement of any of the provision of Articles 3 to 7 of the Data Act with the competent authority designated pursuant to Article 37 of the Data Act.