

### What is the EU Data Act?

The EU Data Act is an EU-wide regulation (Regulation (EU) 2023/2854) that sets rules on how data generated by connected products and related digital services may be accessed and used. The regulation entered into force on 11 January 2024 and its main obligations apply from 12 September 2025.

The EU Data Act requires sellers of connected products and providers of related services to be transparent with users about what data is generated, how it is stored and used, and how users can access, retrieve, delete, or share that data.

The EU Data Act complements the General Data Protection Regulation (GDPR). While the GDPR governs the protection and lawful processing of personal data, the EU Data Act focuses on access to and use of data generated by connected products and services, including both personal and non-personal data. Where product or service data includes personal data, the GDPR continues to apply.

### Warmup Products and Related Services in scope of the EU Data Act?

Connected Products	Related Services
Warmup 7iE	MyHeating App
Warmup Element	MyWarmup Portal
Warmup 6iE mini	

The type, format and estimated volume of product data which our connected devices and associated app/portal are capable of generating.

Data type	Collection frequency	Estimated yearly volume per device
Personal data (email, account info, home address)	Once at registration	~3 KB
Diagnostics data	Dynamic, up to 1/sec. Realistically ~100 events/day	~18,000 events/year × 0.2 KB ≈ 9,000 KB (~9 MB)
Temperature & energy usage data	Dynamic, up to 1/sec. Typical: every 5 minutes	~105,120 readings/year × 0.2 KB ≈ 21,000 KB (~21 MB)
Location data (optional)	Only when geofences trigger; assume 2 triggers/day	~730 events × 0.2 KB ≈ 219 KB (~0.2 MB)
Communication history	When messages sent; assume 20 messages/year	~20 × 2 KB ≈ 20 KB
Subscription preferences & metadata	When opted in/updated; assume once per year	~0.5 KB
Image upload data (not stored)	When uploaded; assume 5 images/year	5 × 1 MB ≈ 5MB (transferred but not retained)

### Data storage and retention

The data listed in the table above is stored on secure remote servers from the time the device is first connected to a user account. The data remains stored for the duration of the user’s account.

If a user deletes their registered device or account, all stored personal data associated with that account is permanently deleted, subject to any limited retention required by applicable law (for example, for security or legal compliance purposes).

## Purpose for collecting this data?

Warmup collects and uses this data itself and is not shared with any third parties unless explicitly agreed with by the user and can be revoked at any time. This data enables Warmup to provide advanced real time control functions to improve energy-efficiency and comfort and understand how customers use their heating systems on a day-to-day basis. We use it to improve the performance, reliability, and usability of our products, and to help diagnose and resolve issues more quickly if technical support is required.

## How to retrieve / erase your data?

We cannot collect data from devices that are not connected and registered with Warmup. The process of connecting and registering your device is detailed in the installation guide and user manual.

### To retrieve your data:

- Visit [my.warmup.com](https://my.warmup.com) and login using your account details.
- On the homepage, click "Profile" and click "Download Personal Data" at the bottom of the profile page.

### To erase your data:

- In "Profile", click "Delete Account" at the bottom of the page to erase all stored personal data for your account.

## Who will handle the data received from the connected device or app/portal?

Warmup plc, at 704 Tudor Estate, Abbey Road, London, NW10 7UW, UK acts as the "data holder" within the meaning of the EU Data Act as we designed the device, operate the app/portal and decide what data is collected, stored, and used. For any enquiries regarding our connected device and related services data in connection with the EU Data Act, you can contact us at [uk@warmup.com](mailto:uk@warmup.com).

## How to request that data is shared with third parties?

Under the EU Data Act, it is permissible for users to download and export their data for personal use. Once downloaded, users may choose to share their data with third parties. We do not provide third parties with direct access to user data unless explicitly requested and authorised by the user. The EU Data Act obliges Warmup to provide data directly to EU-based third parties at the request of an EU user only.

### If you choose to share your data with a third party:

- Ensure it is a person or company that you trust
- It is important to have an agreement with the third party about how they'll use your data
- Ensure the data obtained is not used to develop a connected product that competes with the connected product from which the data originates, nor share the data with a third party with that intent.
- The EU Data Act allows us to seek compensation from the third party – not you as the user – if we send your data directly to them at your request.

If you are a third-party requesting access to data on behalf of a Warmup connected device user, please email [uk@warmup.com](mailto:uk@warmup.com).

Data sharing with the third party can be ended at any time upon request by you the user by emailing [uk@warmup.com](mailto:uk@warmup.com).

## Your right to lodge complaints?

Under the EU Data Act you have the right to lodge a complaint with your national competent EU Authority designated under Article 37 of the EU Data Act if you feel Warmup has infringed on your rights as a user. Contact details will be available on your national authority's website.

## Trade secrets

The data generated by the connected device and associated app/portal includes data that could be used to derive trade secrets. Consequently, data for the past 7 days is not included in any data request.

## Duration of the contract between the user and Warmup

You may terminate via the app or web portal at any time; service ends immediately and data sharing ceases. We may terminate for misuse, security risk, or non-payment with reasonable notice, subject to your statutory rights.