EU Data Act Disclosure

1. Product description: **Sharp Tivo TV**

2. Name and address of manufacturer: Sharp Consumer Electronics Poland sp. z o.o.
Ostaszewo 57B, 87-148 Łysomice, Poland

3. Applicable EU regulation: Directive (EU) 2020/1828 (Data Act)

We, Sharp, as manufacturer of certain product, confirm that information presentats in the disclosure tabel below, is correct and corrrespond to the EU regulation, mentioned above.

Compliance Area	Legal Reference (EU Data Act)*	Question	Manufacturer Response
Data Type & Format	3(2)(a-b)	Please describe the type of data generated by the connected product (e.g., sensor readings, logs, user-entered info).	Smart TV and network data (information and identifiers relating to your device and your network connection, as further specified in the TiVo Smart TV Service Privacy Statement) App usage data (data related to usage of TiVo-powered apps, as further specified in the privacy statement for the applicable TiVo Related Service) Service usage data (data about your use of and interactions with TiVo OS or Autostage Video (as applicable), including interactions with interfaces, menus and functionalities, as further specified in the privacy statement for the applicable TiVo Related Service) Voice command/search data (if you enable this function, as further specified in the privacy statement for the applicable TiVo Related Service) https://xperi.com/eu-data-act-disclosure/
		Please specify the format of the data (CSV, JSON, XML, proprietary).	JSON For deletion and access requests, there are shared in XML.
		Please estimate the volume of data generated per day/week/month.	The volume of data generated will depend on the nature and frequency of your usage of your smart TV.
		Is the connected product capable of generating data continuously and in real time? (Yes/No, please explain)	Yes. Data is generated in real-time. The frequency of data generated will depend on the frequency of your usage of your smart TV.
Data Storage & Retention	3(2)(c)	Where is the data stored (on-device, remote server, hybrid)?	AWS Cloud.
		What is the intended data retention period?	Varies. Refer to TiVo Smart TV Service Privacy Statement for details on data retention periods.

		If the retention period is assumed rather than fixed, please explain the basis for this assumption.	n/a
Data Ownership & Access	3(2)(d), 4(1)	Who is the holder of the generated data (organisation, entity, or third party)?	TiVo Platform Technologies LLC
		Does any entity other than the above-mentioned one control access to the data?	Yes.
		Does Sharp Consumer Electronics Poland Sp. z o. o. have access to the data generated?	No.
		How the user may access, retrieve or erase the generated data?	Currently by submitting a request via the data subject request webform. This is linked in our privacy policy and on our website.
		Can the user directly access, retrieve, or erase the data?	Not currently. We are working on developing the means for this. The current process relies on the OneTrust webform.
Technical Means of Access	3(2)(d)	What technical means (API, dashboard, file export tool) are available to access, retrieve, or erase the data?	File export following the OneTrust process where individual completes the OneTrust web form. Working towards direct access.
		Are these means machine-readable and interoperable?	Yes.
		Are they based on open standards?	Yes.
Terms of Use for Access	3(2)(d)	What are the terms of use for accessing, retrieving, or erasing the data?	n/a. We are developing means for direct access/erasure.
		Are there charges (fees) or conditions?	n/a. We are developing means for direct access/erasure.
		How frequently are the data access, retrieve, erase mechanisms updated? Are users notified of any changes in data processing?	n/a. We are developing means for direct access/erasure.
Quality of Service	3(2)(d)	What service levels (availability, uptime, support) apply when accessing, retrieving, or erasing data?	n/a. We are developing means for direct access/erasure.
		How quickly will requests from users be fulfilled?	Currently, 45 days (in line with our data subject request process). We are developing means for direct access/erasure.
		Are there contingency measures if systems are unavailable?	n/a. We are developing means for direct access/erasure.
Related services	3(1), 3(3), 4(1)	Is the product linked to any additional digital services (e.g., mobile applications, cloud platforms, analytics systems)?	n/a. TiVo OS is a related service.
		Who is the service provider of related services?	n/a. TiVo OS is a related service.
		Will related service data be shared with other entities?	n/a. TiVo OS is a related service.

		Does the service provider, when pursuing its own purposes for data processing, have a legal basis for processing users' personal data in accordance with the requirements of Articles 6 and 9 of the GDPR? If so, please indicate what those legal bases are.	Yes. Legitimate Interests and Consent.
General	1, 3(1)	Is there a designated person within your organization responsible for ensuring compliance with the obligations introduced by the EU Data Act (Regulation EU 2023/2854)? If yes, please provide contact details.	Sharp official compliance representative authorized person, email address DataAccessRequest@sharpconsumer.eu

* *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)*

Supplier Name: Sharp Consumer Electronics Poland Sp. z o. o.
Authorised representative: Kamil Gorczyca
Position: Certification Specialist
Date: 29.09.2025
Signature:

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