SHARP

EU Data Act Disclosure

1. Product description: **Sharp Audio products: Xparty Speakers: PS-949 and Sumobox: CP-LS100 and CP-LS200**

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

3. Applicable EU regulation: Regulation (EU) 2023/2854 (EU Data Act)

We, Sharp, as the manufacturer of the specified product, confirm that the information presented in the disclosure table below is accurate and corresponds 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).	1. Basic smart device information: device name, device ID, online status, activation time, firmware version, and upgrade information. 2. Device usage log: Configuration commands issued by the app to the device, and device status reporting logs.
		Please specify the format of the data (CSV, JSON, XML, proprietary).	xls format, key-value structured.
		Please estimate the volume of data generated per day/week/month.	The volume may vary depending on the type and usage of the connected product. Assuming a user operates a connected product for 30 minutes each day and generates 100 taps during that half-hour, the amount of data uploaded to the cloud is 100 × 0.2 KB = 20 KB per day. That's 140 KB per week and about 600 KB per month.
		Is the connected product capable of generating data continuously and in real time? (Yes/No, please explain)	Yes. When online, connected products can continuously and in real time generate data.
Data Storage & Retention	3(2)(c)	Where is the data stored (on-device, remote server, hybrid)?	Data from connected products is stored on cloud servers (remote server).
		What is the intended data retention period?	Device Data Point (DP) data is retained by default for 7 days.
		If the retention period is assumed rather than fixed, please explain the basis for this assumption.	Not applicable; the default retention period for DP data is fixed at 7 days as specified.
Data Ownership & Access	3(2)(d), 4(1)	Who is the holder of the generated data (organisation, entity, or third party)?	Sharp Consumer Electronics Poland Sp. z o. o. is the data holder and also acts as the data controller.

		Does any entity other than the above-mentioned one control access to the data?	Tuya GmbH and its sub-processors
		Does Sharp Consumer Electronics Poland Sp. z o. o. have access to the data generated?	Sharp Consumer Electronics Poland Sp. z o. o. is the data holder and also acts as the data controller, and have access to the data generated.
		How the user may access, retrieve or erase the generated data?	Access and retrieve: End users can access and export their data via the app used to bind the connected device. Steps: Go to the Me section of the app →Tap the Settings icon in the top right corner →Privacy Policy Management →Device Data Export →Select the device to export →On the preview page, view the device data; to export, tap the export icon in the top right of the preview page and enter the email address to receive the exported data. - Erase: End users can unbind the device and select "Unbind device and delete data."
		Can the user directly access, retrieve, or erase the data?	Yes, when Sharp upgrades the OEM App to version 6.5.0 or above, users can directly access, retrieve, or delete their data by following the steps described above.
Technical Means of Access	3(2)(d)	What technical means (API, dashboard, file export tool) are available to access, retrieve, or erase the data?	The primary technical means is the app used to bind the connected device, which provides functions for data access, retrieval (export), and erasure (via unbinding).
		Are these means machine-readable and interoperable?	Yes, the data is provided in a structured, commonly used, and machine-readable format, ensuring interoperability.
		Are they based on open standards?	Based on the OAuth2.0 protocol standard
Terms of Use for Access	3(2)(d)	What are the terms of use for accessing, retrieving, or erasing the data?	The app provides users with access to the privacy policy and user agreement. Sharp should ensure that the privacy policy or user agreement of its OEM app covers relevant descriptions of user access, export, or erasure of data.
		Are there charges (fees) or conditions?	For individual or household users: Data is provided free of charge.

			For businesses: Data holders may request "reasonable compensation" (covering costs related to providing, transmitting, and storing data); for SMEs, compensation must not exceed the cost incurred.
		How frequently are the data access, retrieve, erase mechanisms updated? Are users notified of any changes in data processing?	Tuya has introduced a new feature in its app for data access and export, with support for SDK clients to be provided by the end of June 2025. Clients can gain capabilities by updating the app to the latest version. It is assumed that users are notified of changes through app updates or related notifications. Changes in data processing require sharp notification to its end users.
Quality of Service	3(2)(d)	What service levels (availability, uptime, support) apply when accessing, retrieving, or erasing data?	Tuya ensures that data access, retrieval, and deletion functions follow the same service levels as our core cloud services, with industry-standard availability (99.9% uptime target). Requests are normally processed in real time, and customer support is available via in-App help or email if assistance is needed.
		How quickly will requests from users be fulfilled?	Immediately
		Are there contingency measures if systems are unavailable?	If the system is unavailable, you can achieve the same goal by sending an email. privacy@tuya.com
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)?	Yes, connected products are linked to IoT platforms (e.g., Tuya IoT platform), cloud storage services, and mobile apps.
		Who is the service provider of related services?	The service provider is Tuya (as the IoT platform and related services provider).
		Will related service data be shared with other entities?	End users can transfer their data to third-party organizations at any time, but data holders must not impose artificial barriers. However, data cannot be shared with EU-designated gatekeepers (e.g., Alphabet, Amazon, etc.).
		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.	The service provider processes data only in accordance with the customer's written instructions, contracts and data processing agreements and does not process data for any of its own purposes

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: 5.12.2025

Signature:

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