



EU Data Act Disclosure

1. Product description: **Sharp TitanOS 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: 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).	The device collects: - Device status (including on/off, connectivity, product settings, diagnostic data, firmware information) - User interactions (including remote control commands, channel changes, volume changes, launcher interactions, application launches) This data is collected regularly and each data record can be associated with: - a timestamp - an advertising ID (IFA UUID) - MAC address - IP address - Session ID.
		Please specify the format of the data (CSV, JSON, XML, proprietary).	JSON
		Please estimate the volume of data generated per day/week/month.	~100kB per device per day
		Is the connected product capable of generating data continuously and in real time? (Yes/No, please explain)	Yes
Data Security	1(5), 11(1)	Does the product collect personal data when used?	Yes
		What kind of personal data is collected?	Personal data and online identifiers collected include: - Advertising ID (IFA UUID) - MAC address - IP address - Session ID

			These identifiers may be associated with the data described above.
		Does the product comply with GDPR/other applicable data protection laws if personal data is processed, in particular, the principles of privacy by design and privacy by default?	Yes
		Does any specific measures your organization has implemented or plans to implement to ensure the security of the shared data, which are based on the results of an analysis of the risk of a breach of data security and the rights or freedoms of data subjects e.g.: - Data encryption during transfer and storage; - Controlled access mechanisms; - Periodic security audits; - Pseudonymization or anonymization of personal data, where technically feasible?	Yes, as it is required to be compliant with GDPR and CRA
Trade Secrets	4(6-8), 8(6)	Does any of the generated data qualify as a trade secret?	No
		If yes, how is this status determined and communicated to the user?	N/A
		What technical and organizational safeguards should be implemented to prevent unauthorised disclosure while meeting EU Data Act (Regulation EU 2023/2854)* obligations?	N/A
Data Storage & Retention	3(2)(c)	Where is the data stored (on-device, remote server, hybrid)?	Data is temporarily stored on the device before being securely transferred to Titan OS remote servers.
		What is the intended data retention period?	Typically between 1 and 9 months
		If the retention period is assumed rather than fixed, please explain the basis for this assumption.	N/A - retention period is fixed
Data Ownership & Access	3(2)(d), 4(1)	Who is the holder of the generated data (organisation, entity, or third party)?	Titan OS S.L.
		Does any entity other than the above-mentioned one control access to the data?	No
		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?	Users may request access to, retrieval of, or erasure of their data by contacting the Data Holder at data@titanos.tv.

		Can the user directly access, retrieve, or erase the data?	Direct on-device access is not technically feasible on a TV. However, users can obtain, retrieve or request erasure of their data through the Data Holder's established access process, free of charge and without undue delay.
Technical Means of Access	3(2)(d)	What technical means (API, dashboard, file export tool) are available to access, retrieve, or erase the data?	Users may request access to, retrieval of, or erasure of their data by contacting the Data Holder at data@titanos.tv. Requested data are provided free of charge, without undue delay, in JSON format, which is structured, machine-readable and interoperable.
		Are these means machine-readable and interoperable?	The returned data follows the JSON standard which is machine readable and interoperable
		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?	Access, retrieval and erasure requests are handled in accordance with GDPR-compliant procedures and the Data Holder's Privacy Notice.
		Are there charges (fees) or conditions?	Users may access their own product data free of charge. A reasonable fee may be charged only to third-party data recipients, in accordance with Article 9 of the EU Data Act. Specific arrangements, such as user authorisation, security measures and data transfer mechanisms, will be agreed with the user and the third party.
		How frequently are the data access, retrieve, erase mechanisms updated? Are users notified of any changes in data processing?	Fundamentally the mechanism is kept the same. If any user relevant change would be made, an update of the Terms of Use will be prompted.
Quality of Service	3(2)(d)	What service levels (availability, uptime, support) apply when accessing, retrieving, or erasing data?	Will be executed without undue delay
		How quickly will requests from users be fulfilled?	Will be executed without undue delay
		Are there contingency measures if systems are unavailable?	If backend services are temporarily unavailable, user requests are securely queued or processed once the services are restored.

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. Titan OS provides cloud-based digital services supporting the connected TV platform. The exchanged data and their purposes are described in the CMP.
		Who is the service provider of related services?	Titan OS S.L.
		Will related service data be shared with other entities?	Yes. Details, including the categories of recipients where applicable, are described in the CMP.
		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. The applicable legal bases (e.g. consent, contract performance and legitimate interests, where applicable) are described in the CMP.
General	1, 3(1)	Are you familiar with the obligations introduced by the EU Data Act (Regulation EU 2023/2854)?	Yes
		Are the products you supply designed to ensure that all relevant data and metadata are, by default, easily, securely, and freely accessible to users in a structured, machine-readable format?	Yes. Although direct on-device access is not technically feasible, the product is designed to ensure that relevant data are made available to users through the Data Holder's established access mechanism in a structured, machine-readable format, free of charge and without undue delay.
		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.	Yes. The designated contact for EU Data Act requests is data@titanos.tv.

* 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: 28.8.2026

Signature:

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