

Data act

in accordance with Regulation (EU) 2023/2854 – Data Act

The EU Data Act applies to certain hardware products and associated services controlling those products, defined in the EU Data Act as “connected products” and “related services”.

This document provides information relevant to connected products by APRIMS and related services.

1. Product Overview

The Connected Product, herein referred to as “Product,” is a smart connected switching device that is designed to operate exclusively within the Apple HomeKit ecosystem.

APRIMS Relayt Switch

EAN: 3800502945017

The Product’s primary function is Switch control (on/off functionality).

The Product does not require user registration with the manufacturer and does not provide the manufacturer with access to user data or device operational data.

1.1. Personal and non-personal data

Personal data: The Product itself does not collect, store, or transmit personal data to the manufacturer.

Non-personal data: Limited technical and operational data is generated and processed locally within the Apple HomeKit environment.

1.2. Product status data

The Product is capable of generating the following product-related data within HomeKit:

- Switch state (on/off)
- Configuration parameters
- Firmware version
- Operational parameters required by the HomeKit protocol

This data remains entirely inside the Apple HomeKit ecosystem and is not accessible to the manufacturer.

1.3. Customer usage data

The Product generates usage-related data within HomeKit, including:

- Activity times of switching events
- Types of activity (on/off actions, automation triggers)

1.4. General environment data

The Product does not generate general environment data.

Any environmental information used for automation (e.g., weather, location) is handled entirely within the Apple ecosystem and it is not related to or used by the Product.

2. The estimated volume of data the connected product can generate

2.1. Data generated through user interaction

Very small data volume per event (typically a few bytes per state change and timestamp) within the HomeKit environment.

2.2. Data generated when the product is in standby or switched off

No data is generated while the Product is in standby or switched off.

2.3. The format of the data

- Encrypted proprietary HomeKit protocol formats for operational and usage data
- Encrypted binary format for firmware update packages

The Product performs a periodic outbound request to the manufacturer's update server only to check for available firmware updates. Additionally, the Product may download a firmware update file of up to 1.6 MB from the manufacturer's update server, when a new version is available.

3. Data generation

Within the Apple HomeKit ecosystem, the Product can generate operational and usage data continuously and in real time in response to user actions and automation events.

4. Data store

All operational and usage data are processed and may be stored within the Apple HomeKit ecosystem, such as on:

- The user's Apple Home hubs (Apple TV, HomePod, iPad)
- The user's iCloud account (if enabled)

The manufacturer does not store any user or device data.

5. Data retention

Data retention is determined exclusively by the user's Apple Home and iCloud settings. The manufacturer does not retain any user data.

6. Data access by the user

User access all data directly through the Apple Home application and the Apple HomeKit environment. The manufacturer does not provide a separate API, portal, or cloud platform for data access.

7. How the user may retrieve the data

- 1) Add the Product to Apple Home using the Apple Home app.
- 2) Open the Apple Home app on an iOS, iPadOS, or macOS device.
- 3) Select the Product to view its current state, activity, and configuration.

Any export or data management options are provided through Apple's ecosystem and governed by the user's Apple ID and iCloud settings.

No interaction with the manufacturer's systems is required.

8. How the user may erase the data

- 1) Remove the Product from the Apple Home app, which deletes associated data from the HomeKit environment.
 - 2) Perform a physical factory reset of the Product to remove local configuration.
 - 3) Manage any remaining data via the user's Apple ID and iCloud account settings.
- The manufacturer does not hold user data, therefore, no erase request to the manufacturer is necessary.

9. Terms of use

The Terms and conditions of using the connected products are available at:
<https://aprimis.com/relaytswitch/termsandconditions>

10. Quality of the service

The Product does not provide manufacturer APIs or SDKs.

All communication, automation, security, and data handling are provided by Apple HomeKit, which offers:

- End-to-end encryption
- Local network isolation
- High reliability and performance managed by Apple

Firmware updates are delivered from the manufacturer's server when available. Performance depends on network connectivity and Apple HomeKit infrastructure.