



## EU Data Act Transparency Declaration

Connected Product: HYLITE Smart Wi-Fi Plug (Tuya Smart Platform)

SKU/Model Number: HSP01

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**Product Description:** WiFi-enabled smart plug compatible with the Tuya Smart / Smart Life app for remote control, scheduling, and (where applicable) energy monitoring.

This document provides the required pre-contractual information under the EU Data Act (Regulation (EU) 2023/2854) regarding the data generated and transmitted by the connected product. It is available in all relevant EU languages via translation services or upon request. The product integrates with the Tuya Smart cloud platform, which handles data processing in compliance with GDPR and the EU Data Act. Users control their data at all times.

### 1. Nature of the Data Generated by the Connected Product

The smart plug generates primarily non-personal technical and usage data to enable remote control, status monitoring, and (for energy-monitoring models) power tracking. Limited personal data may be associated via the linked user account (e.g., account ID, approximate location from IP during setup).

Personal and non-personal data: Device-reported data is mostly non-personal (technical status and metrics). Personal data is limited to account linkage (e.g., email/phone used in the Tuya/Smart Life app). Tuya does not sell user or service data.

Product status data: Device name/ID, online/offline status, activation time, firmware version, upgrade information, configuration (e.g., schedules/timers if set), diagnostic messages (e.g., connectivity status), consumption data (current, voltage, power in W, energy in kWh for monitoring models), and maintenance data (firmware updates).

Customer usage data: Activity times and types (on/off events, timestamps of commands/switching, power usage patterns). No direct geolocation from the device itself (approximate location may be inferred from IP address during initial activation or app use).

General environment data: None generated by this product (no sensors for weather, temperature, humidity, etc.).

Data is reported via Tuya's standard Data Points (DPs) / function points in key-value format.

### 2. Estimated Volume of Data the Connected Product Can Generate

Volume is minimal compared to video or camera devices.

Data generated through user interaction: Low – primarily event-triggered (e.g., on/off commands, schedule changes, or power queries). Typically a few KB per significant event or daily summary.

Data generated when the product is in standby or switched off: Very low/minimal. The device (when powered and online) may send periodic status heartbeats or reports (e.g., online status). When the



relay is "off" (standby mode), only basic status and occasional consumption snapshots are reported if monitoring is enabled. No data is generated if the plug is fully powered off. Overall estimate for a typical smart plug: a few KB per day when online.

### **3. Format of the Data**

Data is structured in key-value (JSON-like) format using Tuya's Data Point (DP) system. Examples include DP IDs for switch status (boolean), current (mA), power (W), voltage (V), and energy totals. Reports are sent as timestamped messages to the cloud. Exports are provided in structured formats such as JSON, CSV, or Excel.

### **4. Information on Whether the Connected Product Can Generate Data Continuously and in Real Time**

Yes. When the plug is powered on and connected to Wi-Fi/internet, it can generate and transmit data continuously and in real time (event-triggered for changes like on/off or power fluctuations, or periodic status updates). Offline devices store no new data until reconnection.

### **5. Information on Where the Data Is Stored**

Data is stored on remote Tuya Cloud servers (not on the device itself, which has no persistent local storage for logs beyond basic operational state). Tuya operates multiple regional data centers, including in the EU (e.g., Frankfurt, Germany – AWS; and Eemshaven, Netherlands – Google Cloud option) for localized storage and compliance. Data is encrypted in transit (TLS 1.2/1.3) and at rest (AES-256).

### **6. Information on the Duration of the Data Retention**

Device function point / usage data (status, consumption, logs): Default retention of 7 days on the Tuya Cloud. This can be extended (up to 3 years in some cases) via paid services on the Tuya Developer Platform.

Account-linked data: Retained for the duration of the user account or as needed to provide the service (minimum necessary period). Data is deleted or anonymized upon account deletion, unbinding, or withdrawal of consent (subject to legal requirements).

### **7. Information on How the User May Access the Data**

Users have direct access through the Tuya Smart or Smart Life mobile app (no separate API/portal required for basic access). Advanced/third-party access is possible via Tuya's EU Data Act-compliant device data sharing (OAuth 2.0). The manufacturer (as data holder via Tuya integration) does not provide a separate custom portal but relies on Tuya's built-in tools.

### **8. Information on How the User May Retrieve the Data**

Technical steps (in the Tuya Smart / Smart Life app):

Open the app and go to Me (bottom tab).

Tap Settings (upper right).

Select Privacy Policy Management.

Choose Device Data Export (or equivalent "Export Device Data").

Select the specific smart plug.



Preview the data, then tap Export.

Enter your email address to receive the exported file (structured format with confidentiality notice).

Data can also be viewed in real time within the app (e.g., power consumption graphs). For developer/third-party access, users can authorize via the app's Authorization Management (Me > Settings > Account and Security > Authorization Management).

## **9. Information on How the User May Erase the Data**

Users can erase data via the app or support channels:

App process: Unbind the device from your account (Device settings > Remove/Unbind) and select the option to Delete Data during unbinding. This removes associated usage logs and device data.

Full account deletion: Delete your Tuya/Smart Life account via app settings or support, which deletes all linked data.

Request process: Submit a data deletion request via the app (Me > Help Center > Feedback), email (privacy@tuya.com or service@tuya.com), or Tuya's Personal Data Rights Request form. Tuya uses secure cloud deletion mechanisms for permanent removal.

Data is automatically purged after the retention period if not extended.

## **10. Information on Your Terms of Use**

The product uses the Tuya Smart platform. Full terms are available here:

Tuya Terms of Use: <https://developerapp.tuya.com/protocol/193cc9e3ff80005d?lang=en> (or latest version via Tuya Trust Center).

Tuya Privacy Policy: Available in the app or at Tuya's Trust Center.

These govern data processing, user rights, and service use. The manufacturer does not maintain separate terms overriding Tuya's for device data.

## **11. Information on the Quality of the Service**

Tuya (the platform provider) offers high-quality, certified services with global compliance (ISO 27001, SOC 2 Type II, GDPR, EU Data Act). No custom APIs/SDKs are provided directly by the manufacturer beyond Tuya integration.

APIs and SDKs: Tuya provides comprehensive Open APIs, Device Data Sharing APIs (OAuth 2.0 for EU Data Act third-party access), and SDKs for developers/OEMs via the Tuya Developer Platform. These enable real-time data access, message subscriptions, and custom integrations (e.g., for energy analytics). Real-time messaging follows Tuya's Standard Instruction Set. Availability and performance are monitored via Tuya's global cloud infrastructure with SLAs for uptime and data delivery.

User Rights under the EU Data Act: You have the right to access, retrieve, port, and delete the data generated by this product in an easy, free, and secure way. You may also authorize third parties to access it. Contact the seller or Tuya support for assistance.

For questions or the latest version of this declaration, contact the seller. This information is based on Tuya's official platform documentation and compliance guidance for OEM customers. Data practices may evolve; refer to the in-app policies for the most current details.