EU DATA ACT
Declaration of Conformity

inventronics

Document number:	9C1-4550009-EN-01
This declaration of conformity is issued under the sole responsibility of:	
Manufacturer / **Representative:**	Inventronics GmbH Parkring 31-33, 85748 Garching, Germany
Product type:	Connected Products and Related Software & Services

NFC Drivers:

- **OT FIT Horticulture NFC; OT FIT Industry NFC; OT FIT NFC; DEXAL Industry NFC DEXAL NFC; OT NFC Wireless Intelligent; OTI DALI Industry NFC; OTI DALI NFC; OTI DALI NFC TW; OT FIT NFC; OT FIT NFC G2; DEXAL NFC; OT NFC Wireless Intelligent Low Profile; OT NFC Wireless Intelligent Track; OTI DALI NFC; OTI DALI NFC Independent; OTI DALI NFC Low Profile OTI DALI NFC Small built-in; OTI DALI NFC Track black; OTI DALI NFC Track OTI DALI NFC TW; OTI DALI NFC TW Independent**
- **DEXAL NFC; OT DEXAL NFC G2; OT DEXAL NFC TW; OT NFC 1DIM Astro G3; OT NFC 1DIM G3 OT NFC 4DIM Astro G3; OT NFC 4DIM G3**

Wireless driver:

OT NFC Wireless Intelligent; OT NFC Wireless Intelligent Low Profile; OT NFC Wireless Intelligent Track; OT Wireless Intelligent 24V; OT Wireless Intelligent Dimmable

Dali Driver:

- **DEXAL Industry NFC; DEXAL NFC; ETI DALI; OTI DALI linear; OTI DALI linear G2 OTI DALI Industry NFC; OTI DALI NFC; OTI DALI NFC TW; OTI DALI Ultraflat**
- **DEXAL NFC; OTI DALI compact; OTI DALI NFC; OTI DALI NFC Independent; OTI DALI NFC Low Profile; OTI DALI NFC Small built-in; OTI DALI NFC Track black; OTI DALI NFC Track OTI DALI NFC TW; OTI DALI NFC TW Independent**
- **IT DALI; DEXAL NFC; P5; P7; OT 4DIM Astro G2; OT DEXAL; OT DEXAL NFC G2 OT DEXAL NFC TW; OTI DALI 24V; OTI DALI 24V G3; OTI DALI 24V TW; OTI DALI 24V TW G3**
- **OTI DALI 48V; OTI DALI 4 CH; OTI DALI 100-210W 4CH; OTI DALI TW**

Sensors:

- **Touch DIM LS/PD LI**
- **Sensor HF P Z; Sensor PD P Z**
- **HIGH BAY SENSOR**
- **VISION SENSOR**
- **OSENZA Office G2**
- **LUXeye Sense DALI BT; LUXeye Sense 10A BT**
- **DALIeco LS/PD LI NP; DALIeco LS/PD LI;**
- **DALI SENSOR LS/PD LI G2; DALI SENSOR LS/PD CI G2; DALI SENSOR LS/PD LI UF G2;**
- **DALI COUPLER MULTI3 G2; DALI COUPLER LS HIGHBAY G2; DALI COUPLER HF G2; DALI COUPLER E G2**
- **LS/PD MULTI 3 CI**
- **DALI-2 SENSOR LS/PD MB LI; DALI-2 SENSOR LS/PD LB LI; DALI-2 SENSOR LS/PD O LI; DALI-2 SENSOR LS/PD O CI; DALI-2 SENSOR LS/PD C CI; DALI-2 SENSOR LS/PD W CM; DALI-2 SENSOR LS/PD HB CM; DALI-2 SENSOR LS/PD LI HB**
- **HF LS LI**
- **CA SENSOR D HB LI; CA SENSOR D OF LI**

EU DATA ACT
Declaration of Conformity

Sensor & Controller:

- **B NLC 220-240 LS/PD CI; B NLC 220-240 LS/PD HB;**
- **B NLC D OF LI; B NLC D HB LI;**
  B NLC D LI R; B NLC D MB LI; B NLC D LB LI; B NLC D OF LI BK; B NLC D OF LI S;
- **B NLC D4I HF P Z; B NLC D4I PD P Z; B NLC D4i LS P Z**

Controller:

- **DALI Switch 4X16**
- **DALI REP LI; DALI REP SO**
- **DALI PRO CONT-4 RTC**
- **B NLC 10V CO REL; B NLC DALI CONV; B NLC DALI EL-T CONV; B NLC PB Coupler**
- **DALI PCU TW G2; DALI MCU TW G2**
- **DIM MCU G2**
- **DALI ACU BT**
- **DALI ECO BT CONTROL; DALI ECO BT RTC; DALI ECO CONTROL; DALI ECO SWARM ADAPTER**

DALI PRO 2 IoT

QBM Gateway

Related Software & Services:

- **Tuner4TRONIC Cloud**
- **Mobile apps: BT Control; BT Config; DALI Pro Control; LUXeye Config; LUXeye Control; HubSense R2G**
- **DALI Pro 2 (PC Software); DALI Pro 2 IoT (Web User Interface)**
- **EM/MA-Dashboard**
- **HubSense R-IoT Cloud and Dashboard**
- **HubSense Commissioning**

The product(s) is (are) in conformity with the relevant Union harmonisation legislation, including all amendments:

2023/2854/EU

Harmonised rules on fair access to and use of data and amending Regulation (EU) 2017/2394 and Directive (EU) 2020/1828 (Data Act)

Signed for and on behalf of: Inventronics GmbH

Place and date of issue: Garching, 22.08.2025

Signature of authorised person:

DI DS EMA QM Luca Bordin

DS QM LAB&SQM Bernhard Schemmel

Luca Bordin	Bernhard Schemmel
Quality Management	Quality Assurance

EU DATA ACT
Declaration of Conformity

inventronics

Connected Products

EU Data Act related information	DALI Driver	Wireless Drivers	NFC Driver	Sensors	Controllers	DALI PRO 2 IoT	QBM Gateway
1. The type, format and estimated volume of product data which the connected product is capable of generating	Data regarding the product status, energy consumption, failure-modes and meta-data about the product itself. DALI-format according to IE62386-xxx. Data-volume is in the range of 100 byte to 1kB per one complete set of data. Controllers typically read the data every minute to one hour.	Data regarding the product status, energy consumption, RSSI, failure-modes and meta-data about the product itself. Bluetooth-format according to bluetooth mesh profiles. Data-volume is in the range of 100 byte to 1kB per one complete set of data. Controllers typically read the data every minute to one hour.	Data regarding the product status, energy consumption, failure-modes and meta-data about the product itself.Data are stored in a proprietary format Data-volume is in the range of 100 byte to 1kB per one complete set of data	motion detection, light level, RSSI Data regarding motion detection, light level, RSSI, failure-modes and meta-data about the product itself.Data are stored in a standardized format: DALI sensors: IEC62368-3xx QBM (bluetooth) sensors: Bluetooth mesh profiles Casambi: proprietary format	Type: lighting devices commands (LED drivers, sensors, PBC, etc.), configuration data Format: DALI standard packets Volume: up to 10MB (considering both data flowing through the DALI bus and data stored on the device)	Format JSON, average 500MB/month.	Format JSON, average 200MB/month for a 200 nodes typical installation.
2. Whether the connected product is capable of generating data continuously and in real-time	Yes, the product can generate data continuously and in real time	Yes, the product can generate data continuously and in real time	Yes, see above (lifetime data, energy consumption)	Yes, the product can generate data continuously and in real time	Yes, the product can generate data continuosly and in real time	Yes, is capable of RT data.	Yes, is capable of RT data.
3. Whether the connected product is capable of storing data on-device or on a remote server, including, where applicable, the intended duration of retention	No, only current/real time values are generated	No, only current/real time values are generated	No (only setting data are stored)	no storing	Yes, The product can store: - configuration data, within retention until the data is deleted or overwritten by the user (there is no automatic deletion policy applied) - connected devices status data, with retention until the status changes	Yes, The device can store data locally to be sent to the cloud (rotation buffer) if activated (EMMA service), data are retained up to 7 days depending on the configuration. In the cloud is retained for 13 months.	Yes, data can be ratained up to a week and can be sent to our cloud and maintained for a month (samples) 13 months ELT data.
4. How the user may access, retrieve or, where relevant, erase the data, including the technical means to do so, as well as their terms of use and quality of service	User can access the data via DALI-format according to IE62386-xxx	QBM: QBM-Gateway and Hubsense App (free) Casambi: Casambi Cloud Gateway and Casambi App (free)	all data can be red out via T4T	gateway DALI: e.g. DALI magic tool QBM: QBM-Gateway and Hubsense App (free) Casambi: Casambi Cloud Gateway and Casambi App (free)	The user can access configuration data and change or erase it via the commissioning tools available for the product (the configuration tools may be different from product to product)	There are different options: - local REST API interface - Commissioning Web UI (user interface) - Commissioning PC Tool	Data can be manipulated locally with API updated on hourly basis (cannot be deleted). Data is delivered though standatized machine readable format (REST API, MQTT) The end user can retrieve the data with market available software

EU DATA ACT
Declaration of Conformity

inventronics

Related Software& Service

EU Data Act related information	Tuner4TRONIC Cloud	BT Control, DALI Pro Control, LUXege Config, LUXege App Control, HubSense R2G	DALI Pro 2 (PC Software) DALI Pro 2 IoT (Web User Interface)	EM/MA-Dashboard	HubSense www.hubsense.io
1. The nature, estimated volume and collection frequency of product data that the prospective data holder is expected to obtain and the arrangements for the user to access or retrieve such data, including the prospective data holder's data storage arrangements and the duration of retention;	Nature: Programming tools such as (P4, DLL, CMD or Filed application) are collecting and sending anonymous configuration properties used during ECG programming. The configuration data package includes driver identifier, tool name and version and properties written to the driver. No customer identifying information like API key is transmitted. Collection Frequency: Data collection is triggered on every programming cycle Retention: Data is retained for the lifecycle of the product Access: Data can be accessed by the user of the cloud application No external access for 3rd parties	- Nature: configuration data of connected controllers and connected DALI devices - Collection frequency: on user request (no automatic collection) - Volume: up to 1MB for each uploaded configuration - By connecting the mobile app to the controller, the app is retrieving the needed data and it's storing the data in a folder in the smartphone memory. The data can be optionally saved in an iCloud or Google Drive folder (R2G app only). The data is kept until the user decides to delete it (no automatic data removal policy in place)	- Nature: configuration data of DALI PRO and DALI PRO 2 devices along with the connected devices on the DALI bus - Collection frequency: on user request (no automatic collection) - Volume: up to 1MB for each uploaded configuration - By connecting the tool to the DALI PRO or DALI PRO 2 device, the tool is downloading the needed data and it's storing the data in a folder in the PC where the tool is running. The data is kept until the user decides to delete it (no automatic data removal policy in place)	-Nature: energy consumption data of connected devices - Volume: 500 MB/month on average - Collection frequency: on status change by every device - The user can access to the data visually, using a dashboard, or downloading in CSV. The data is available in daily bases and retained for 13 months.	- Nature: energy consumption and status data of connected devices - Volume: 200 MB/month on average - Collection frequency: once per hour per connected device - The user can access to the data visually, using a dashboard, or downloading in CSV; for the user also API are available to retrieve data and meta-data. The data is available in daily bases and retained for 13 months for ELT reports and 1 month for other type of samples.
2. The nature and estimated volume of related service data to be generated, as well as the arrangements for the user to access or retrieve such data, including the prospective data holder's data storage arrangements and the duration of retention;	Nature: Client Project data. Clients with private API key can create and store configuration projects in the cloud Retention: For the lifetime of the API key or user-controlled retention policy. Access: Clients can access, modify or delete the data at any time after creation Configuation is a one time event, No additional data will be generated during lifetime of the product	No data collection	- Nature: log files - Collection frequency: on user request (no automatic collection) - Volume: 1MB on average - the data it's stored in the controller and in a user folder of the PC where the PC tool is running. A maximum of 50 log files is allowed; when this limit is reached the oldest files are automatically deleted and substituted by new ones.	No data collection	No data collection
3. prospective data holder expectations on the readiness of use of the data itself and the purposes for which those data are to be used, and if one or more third parties will be allowed to use the data for purposes agreed upon with the user;	Client data available immediately after creation Client data can be reused to configure future project or track historical projects No 3rd party data access available Commissioning is a one time event, No additional data will be generated during lifetime of the product	- The data is immediately available after the retrieval - The data can be used to configure and monitor the connected devices - No 3rd parties are allowed to use the data	- The data is immediately available after the retrieval - The data can be used to configure and monitor the connected devices and the tool itself - No 3rd parties are allowed to use the data - Data are password protected but can be made available for extenals on demand	- The collected values are refreshed on daily bases, within 24h in normal conditions for the purpose of optimizing building use such as reducing energy consumption. - There are no third parties involved except the cloud service providers.	*There are no third parties involved except Amazon Web Services providers that confirm that it will won't access the data. The collected values are refreshed on daily bases, within 24h in normal conditions.* >> Waiting Silvair response for integration
4. The identity of the prospective data holder, such as its trading name and the geographical address at which it is established and, where applicable, of other data processing	Inventronics GmbH Parkring 31-33, 85748 Garching	Inventronics GmbH Parkring 31-33, 85748 Garching	Inventronics GmbH Parkring 31-33, 85748 Garching	Inventronics GmbH Parkring 31-33, 85748 Garching	Inventronics GmbH Parkring 31-33, 85748 Garching
5. The means of communication to contact the prospective data holder	support@inventronicsglobal.com				
6. How the user can request that the data be shared with a third party and, where applicable, end the data sharing	No data collection	T4Tsupport@inventronicsglobal.com	support@inventronicsglobal.com		
7. The user's right to lodge a complaint alleging an infringement of any of the provisions of this Chapter with the competent authority designated pursuant to Article 37	The user can contact the local market authority, e.g. for Germany "Bundesnetzagentur"				
8. If a prospective data holder is the holder of trade secrets contained in the data that is accessible from the connected product or generated during the provision of a related service, and, where the prospective data holder is not the trade secret holder, the identity of the trade secret holder	Normally we do not expect data colleced with our products contains a trade secret. If in special case there are trade secrets (agreed with the customer) Inventronics GmbH acts as the holder				
9. The duration of the contract between the user and the prospective data holder, as well as the arrangements for terminating such a contract	Unless otherwise agreed with the customer the legal warrenty applies				