EU Data Act Pre-Contractual Information for Consumers

Connected Products and Related Digital Services

This information is provided by Harman International Industries, Incorporated and all affiliated entities (Harman) pursuant to Regulation (EU) 2023/2854 (the "EU Data Act").

This notice applies to connected products and related digital services placed on the EU market by or on behalf of Harman.

Under the EU Data Act, certain information must be made available to consumers before purchase and before first use of applicable products.

1. What Is a Connected Product and Related Digital Services?

Certain products manufactured by Harman qualify as connected products and related digital services under the EU Data Act.

Connected products collect, generate, or record data through sensors, software, or connectivity features, and make that data available electronically, either locally or remotely.

Related digital services are digital services, including software, applications, or cloud-based services, that are incorporated into or interoperate with a connected product and without which the connected product would not be able to perform one or more of its intended functions.

This notice describes general data practices for such products and related digital services, independent of any specific model or configuration.

2. What Types of Data May Be Generated?

Depending on the nature of the product, its software, configuration, and how it is used, a connected product may generate different categories of data, including:

- Operational and usage data
  (e.g. device status, feature activation, performance metrics)

- Technical or diagnostic data
  (e.g. error reports, software or firmware information)

- Sensor or environmental data, where relevant
  (e.g. measurements captured by embedded sensors during use)

- Interaction data related to associated digital services or applications

The type and volume of data generated may vary over time and may change with updates, settings, or usage patterns.

Data made available under the EU Data Act generally includes data generated by the use of the product (raw or observed data) and does not typically include inferred or derived data created by Harman, unless required by law.

3. How and Where Is the Data Processed?

Data may be processed directly on the product, locally, or through related digital services, depending on the product and its design. Some data may be used temporarily to enable real-time or short-term functionality. Certain processed or derived data may be used to support product operation, improvement, or support services.

4. Personal Data and Data Protection Law

Data generated by connected products may be non-personal or personal, depending on how the product is used. Any personal data is processed in accordance with applicable data protection law, including the General Data Protection Regulation (GDPR). Information required under the GDPR (such as legal bases, recipients, and retention periods for personal data) is provided separately in applicable privacy notices at https://www.harman.com/privacy-policy.

The EU Data Act applies in addition to, and does not replace, data protection law.

5. Who Can Access Product Data Associated with a Connected Product?

The User

Under the EU Data Act, users have the right to:

- Access data generated by their use of the product, and
- Request that this data be shared with a third party of their choice, where technically feasible and in accordance with applicable law.

The Manufacturer

In connection with related digital services, Harman expects to use readily available data (i.e., data accessible from the connected product or generated during the provision of a related digital service) for the following purposes:

- operate, maintain, and secure the product or related services
- provide support, updates, and improvements
- ensure safety and regulatory compliance
- meet legal obligations

Where agreed with the user, Harman may allow one or more third parties (e.g., repairers or service providers) to use such readily available data for the purpose(s) agreed with the user, subject to appropriate confidentiality, security, and legal requirements.

Harman will not use readily available data in a manner that unjustifiably restricts user choice or competition. Harman may use third parties (processors) to provide technical or operational support for connected products and related digital services, subject to appropriate confidentiality and security obligations. Learn more by visiting https://www.harman.com/privacy-policy.

6. How Can Users Access Their Data?

Currently, requests for access to product data under the EU Data Act may be submitted via privacy@harman.com. This contact channel is used to route EU Data Act related requests and does not replace GDPR data subject request mechanisms described in the Harman Privacy Notice.

Requests may be subject to verification of identity and proof of ownership or authorized use.

Access is provided, where technically feasible and in accordance with applicable law:

- without undue delay
- in a commonly used, machine-readable format
- free of charge for users, unless otherwise permitted under the EU Data Act

7. Sharing Data with Third Parties Per User's Request

Users may request product data be made available to third parties (for example, repairers or service providers), provided that:

- the request complies with the EU Data Act
- sharing is technically feasible
- appropriate safeguards are in place

Third parties receiving data are required to:

- use it only for the agreed purpose
- respect confidentiality, security, and applicable legal requirements
- not further share the data unlawfully

8. Trade Secrets, Security, and Safeguards

In certain cases, access to data accessible from the connected product or generated during the provision of related digital services may be subject to safeguards to:

- protect trade secrets or intellectual property
- prevent cybersecurity risks
- ensure safe and proper operation of the product

Harman (or its licensors) may be the holder of trade secrets contained in such data. Where Harman is not the trade-secret holder, the identity of the trade-secret holder will be indicated where required and appropriate. Where applicable, access may be provided subject to proportionate technical or contractual protections, as permitted under the EU Data Act.

9. Data Retention

Product data is retained:

- only for as long as necessary for the purposes described in this notice
- in accordance with legal, regulatory, and security requirements

Retention practices may differ depending on the type of data and the product category.

10. Further Information and Contact

For questions relating to the EU Data Act or data access requests, please email privacy@harman.com.

Terms governing related digital services, including contract duration and termination arrangements, are provided in the applicable Terms of Use/Service available within your connected application or on Harman's websites.

11. Legal Notice

This information is provided in accordance with Regulation (EU) 2023/2854 (EU Data Act) and does not limit or replace any rights granted under EU or national law.