



3 March 2026

## EU Data Act (Regulation (EU) 2023/2854) – Applicability Assessment

### For Innohome Charlie EV Chargers:

*This assessment applies to models:*

*CHARLIE-1, CHARLIE-3, CHARLIE-C*

The product is not a connected product within the meaning of Regulation (EU) 2023/2854.

It has no wireless or wired communication capability, no digital interface for data exchange, no companion application, and no related digital service. The product does not generate, collect, store, or transmit product data, usage data, environmental data, telemetry, or metadata during operation.

As no “product data” or “related service data” are generated within the meaning of Articles 2 and 3 of Regulation (EU) 2023/2854, the provisions of Chapter II (user access to data and data sharing obligations) do not apply.

The product does not process personal data. Accordingly, neither Regulation (EU) 2023/2854 nor the GDPR impose data access, portability, or sharing obligations in relation to this product.

The applicability of Regulation (EU) 2023/2854 will be reassessed if future product versions introduce connectivity, digital interfaces, or data generating functionalities.



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## For Innohome EVO Stove Guards:

*This assessment applies to models:*

*K125X-TINO, K125X-NINO, K132X-TITO, K320X-TITO, K320X-PIPO*

*X stands for colour code of the Sensor Unit: G = Grey, W = White, B = Black.*

*For example, K320W-TITO has a white Sensor Unit.*

The product qualifies as a connected product only to the limited extent that it supports a companion application (Innohome EVO App) used exclusively for initial setup and configuration.

The companion application does not collect, generate, store, or transmit:

- product usage data,
- telemetry,
- behavioural data,
- environmental data,
- performance data, or
- any other product or related service data within the meaning of Articles 2(1), 2(3), and 3 of Regulation (EU) 2023/2854.

The application is used solely to write user defined configuration parameters (e.g. settings and preferences) to the device. These parameters are not generated by the product through its use and do not constitute “product data” or “related service data” under the Data Act.

No personal data is processed by the device or the companion application. Accordingly, Chapter II obligations concerning user access to product data and data sharing do not apply.

The applicability of Regulation (EU) 2023/2854 will be reassessed if future product versions introduce telemetry, monitoring, logging, analytics, or cloud-based services.