Information Notice on product-data in accordance with the EU Data Act

Content

1. Subject matter of the declaration

This customer information is provided in accordance with Article 3 of Regulation (EU) 2023/2854 (Data Act). It serves to provide users with transparent, understandable, and verifiable information about the type, scope, and accessibility of the data generated when using the product.

2. Manufacturer’s declaration

The manufacturer hereby declares that the information provided below regarding the data generated by the product is complete, accurate, and in accordance with the requirements of Article 3 of Regulation (EU) 2023/2854 (EU Data Act).
This declaration is intended for users of the product, business partners, and competent market surveillance and supervisory authorities.

3. Information about the manufacturer and product

Information	**Content**
Product name	**TR 644**
Item number / Product ID	**6440330**
Modell	**top3 BLE RC**
Manufacturer / Legal form	**Theben AG**
Manufacturer’s headquarters	**Hohenbergstrasse 32, 72401 Haigerloch**
Contact point for Data Act inquiries	**compliance@security.theben.de**
Date of information	**2025.09.01**
Document version	**V1.0**

4. Description of functionality

The product is a networked product within the meaning of Art. 2 No. 5 EU Data Act. It generates and collects data within the scope of its intended use. The essential functions of the product are:

- Digital time switch with yearly and astronomical time program

5. Interface: Databus

5.1. Categories of product data generated

The manufacturer declares that the product generates the following categories of data, including the relevant metadata necessary for the interpretation and use of this data.

5.1.1. Usage and operational data

Description of the data generated directly by the use of the product (e.g., configuration, status, operating, and performance data).

DATABUS operating data consists of device-related information exchanged over a single-wire serial, half-duplex communication bus. Typical operating data includes general device information, device type identifiers, and serial numbers used for identification and system operation.

5.1.2. Sensor data

Measurement and event data from sensors integrated into the product.

DATABUS sensor data includes measured values transmitted by connected components, such as digital light sensor readings, temperature values, and time information obtained from an integrated DCF antenna or from a GNSS antenna. Depending on the configuration, GNSS-based data may include time and positional information.

5.1.3. Derived data

Data generated by analysis, aggregation, or other processing of raw data (e.g., diagnostic and usage data).

Derived data may be generated by higher-level control units or applications based on DATABUS data, such as calculated trends, thresholds, or validation of sensor readings. These derived data are not generated by the DATABUS communication itself.

5.1.4. Personal data

Insofar as personal data is processed, this is done in compliance with the GDPR. This declaration does not constitute an independent legal basis under data protection law.

DATABUS devices do not process or store personal data. All exchanged data relates exclusively to device identification, sensor measurements, and system operation.

5.1.5. Type and format of data provision

The product data is provided in a structured, commonly used, and machine-readable format, if technically feasible, continuously and in real time.

Data format	DATABUS communication is based on a proprietary single-wire serial protocol operating in half-duplex mode. Data is exchanged in structured telegrams defined by the system design, carrying device information, sensor values, and time or position data.
Access method	DATABUS data exchange is initiated by a master or controlling device and takes place exclusively within a local installation via a single-wire serial connection. Communication is local and does not include any automatic transmission of data to external networks or cloud systems. Any recording or storage of data beyond real-time processing depends on externally connected systems.

Timeliness	DATABUS communication operates at a low data rate suitable for single-wire, half-duplex transmission. Individual telegrams are present on the bus only during active communication and are not persistently available after transmission.

5.1.6. Storage location and storage period

Storage location	Not applicable - DATABUS devices do not store operational or usage data beyond temporary internal states required for device operation, unless explicitly designed to do so.
Storage period	Not applicable - No default persistent storage of operational or usage data is performed by DATABUS devices.
Deletion or anonymization concept	Not applicable - DATABUS devices do not use user accounts. Any configuration or identification data can be overwritten or cleared by reconfiguration or device reset.

6. Interface: I2C

6.1. Categories of product data generated

The manufacturer declares that the product generates the following categories of data, including the relevant metadata necessary for the interpretation and use of this data.

6.1.1. Usage and operational data

Description of the data generated directly by the use of the product (e.g., configuration, status, operating, and performance data).

I²C operating data consists of configuration parameters, switching schedules, and control commands exchanged between devices over a local I²C bus. Data may be transferred directly by an I²C master or via a BLE–I²C USB stick acting as a communication bridge.

6.1.2. Sensor data

Measurement and event data from sensors integrated into the product.

Not applicable - The I²C communication described here does not transmit sensor measurement data.

6.1.3. Derived data

Data generated by analysis, aggregation, or other processing of raw data (e.g., diagnostic and usage data).

Derived data may be generated by the controlling system or by a BLE–I²C USB stick based on I²C-transmitted data. No derived data is generated by the I²C bus itself.

6.1.4. Personal data

Insofar as personal data is processed, this is done in compliance with the GDPR. This declaration does not constitute an independent legal basis under data protection law.

I²C devices do not process or store personal data. All exchanged data relates exclusively to device configuration and operation.

6.1.5. Type and format of data provision

The product data is provided in a structured, commonly used, and machine-readable format, if technically feasible, continuously and in real time.

Data format	I²C communication uses a proprietary, command-based data format transmitted over the I²C bus. Data is exchanged as structured messages containing commands, payload data, and integrity checks.
Access method	Data exchange is initiated locally via the I²C bus or via a BLE–I²C USB stick providing local wireless access. Communication remains local and does not involve automatic transmission to external networks or cloud systems.
Timeliness	I²C communication is active only during data transmission. Exchanged data is transient and not persistently available after completion.

6.1.6. Storage location and storage period

Storage location	Configuration data and switching schedules are stored locally in the device. A complete data set may also be stored on the BLE–I²C USB stick for transport purposes.
Storage period	Stored data remains available until overwritten, deleted, or the device is reset.
Deletion or anonymization concept	Stored data can be deleted by overwriting configuration data, resetting the device, or clearing the BLE–I²C USB stick. No user accounts are used.