



## PRODUCT DATA AND PRIVACY PROCESSING STATEMENT

### INTRODUCTION

This document is prepared in response to the requirements of the EU Data Act (*Regulation (EU) 2023/2854, effective September 12, 2025*) and clarifies the data processing practices of the Infusion Pump and Syringe Pump connected medical devices from **Guangzhou WIT Medical Technology Co., Ltd.** We are committed to product transparency, compliance, and hold user privacy and data security in the highest regard.

### 1.PRODUCT SCOPE

This statement applies to the following products:

- Infusion Pump WIT-601A  
Related software/Firmware version numbers:  
WIT601 M0000110 V301.01.12.0  
WIT601 S V304.01.07.0.
- Syringe Pump WIT-301A  
Related software/Firmware version numbers:  
WIT301A M0001110 V301.01.12.0  
WIT301A S V113.00.07.0
- Syringe Pump WIT-302  
Related software/Firmware version numbers:  
WIT302 M0000100 V109.01.13.0.  
WIT301A S V113.00.07.0

### 2. CORE STATEMENT: CURRENT DATA PROCESSING PRACTICES

Upon comprehensive technical assessment, we hereby declare that the aforementioned Infusion Pump and Syringe Pump products, in their current design functionality and operational mode, **function solely as medical operational devices.**

- **No Collection of Personal Data:** The device itself does **NOT collect, process, or store any personal data.** This includes, but is not limited to, patient names, dates of birth, medical record numbers, diagnostic information, physiological parameters, or any information that could be used to directly or indirectly identify an individual.
- **Anonymous Device Data:** The device may generate data during operation such as operational logs, infusion rates, volume delivered, and alarm events (e.g., Syringe Occlusion). This data is considered **anonymous device performance data** and is **not linked** to any specific individual. This data is used solely for the operation of the device and to provide necessary clinical functions.



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### 3.DATA ACCESS AND SHARING

We understand and commit to the core principles of data access and sharing outlined in the Data Act:

- **Data Access:** Although the data generated by the device are anonymous, should users require it, we commit to providing necessary technical support in accordance with the Data Act to enable users to access the generated anonymous operational data safely and free of charge..
- **Data Sharing:** Upon explicit authorization by the user, we will cooperate and provide technical support to **share the user-specified anonymous device data with authorized third parties** (e.g., hospital equipment management departments or maintenance service providers), where technically feasible.

### 4.DATA SECURITY COMMITMENT

**Guangzhou WIT Medical Technology Co., Ltd.** prioritizes product security. We adhere to a strict Security Development Lifecycle (SDL) and implement appropriate technical and organizational measures to ensure the **operational safety, reliability, and data integrity** of our devices.

### 5.FUTURE CHANGES

Should our products incorporate any new features in future upgrades or software versions that may involve the processing of personal data, we will **promptly update this statement** and ensure that any such data processing activities strictly comply with the General Data Protection Regulation (GDPR), the Data Act, and other applicable data protection laws. We will seek user consent prior to implementing such changes.

### 6.CONTACT US

If you have any questions regarding this statement or our data practices, please contact our Data Protection Team at:

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