

Dear Ladies and Gentlemen,



The European Parliament has set itself the goal of creating the basis for fair data access and use. Regulation (EU) 2023/2854 was adopted with this objective in mind.

According to Article 1 (3 a), EU Regulation EU 2023/2854 applies to *manufacturers of connected products placed on the market in the Union and providers of connected services, regardless of the place of establishment of these manufacturers or providers.*

The term "connected product" in Article 2 (5) of the Regulation defines *an object that collects, generates or collects data about its use or environment and that can transmit product data via an electronic communications service, physical connection or access on the device and whose main function is not to store, process or transmit data on behalf of a party other than the user.* According to Article 2(12), the 'user' is a natural or legal person who owns a connected product or who has been contractually granted temporary rights to use that connected product or who receives related services.

All Steinel products store, process or transmit data exclusively on behalf of the user. The user has full access to this data at all times.

In this sense, Steinel products that can be networked via Bluetooth, KNX and Dali are not networked products according to the definition of the regulation and therefore do not fall within the scope of the regulation.

Examples:

- Steinel camera lights: The video sequences are stored on an SD card in the camera and are only accessible to the user.
- Bluetooth Mesh products: The customer puts them into operation with an app on their own smartphone, which does not require an Internet connection. All communication between product and smartphone takes place via the standardized BT Mesh protocol and could also be done via 3rd party apps (e.g. Nordic nRF app).
- KNX/DALI products: The customer must manually connect these products to each other and put them into operation with their own system environment. No internet connection is required for this and all communication takes place via the respective standardized protocols.

Best regards,

A blue ink signature of Torsten Born, consisting of a stylized 'T' followed by a horizontal line.

ppa. Torsten Born
Head of Research & Development

A blue ink signature of Michael Wallenhorst, written in a cursive style.

i.V. Michael Wallenhorst
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