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

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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	**TRIM 200**
Item number / Product ID	**490100021**
Modell	**230VAC 50/60HZ**
Manufacturer / Legal form	**Grässlin Zeitschalttechnik GmbH**
Manufacturer’s headquarters	**Leopoldstr. 1, 78112 St. Georgen**
Contact point for Data Act inquiries	**compliance@graesslin.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:

- Flush-mounted dimmer for R and C loads

5. Interface: BLE

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).

BLE operating data consists of control commands, configuration parameters, and status information exchanged between a BLE central device e.g. Mobile-App and a BLE peripheral. Communication is implemented as a UART protocol tunneled over BLE GATT characteristics (Rx/Tx).

Supported operating data includes device-specific parameters and control commands for motion detectors, room temperature controllers, and dimmers, such as switching commands, dimming levels, operating modes, schedules, and configuration values.

5.1.2. Sensor data

Measurement and event data from sensors integrated into the product.

BLE sensor data includes values transmitted by connected devices, depending on the device type:

- Motion detectors: motion or presence detection states, brightness values, brightness thresholds, follow-up times, and automatic programs
- Room temperature controllers (RAMSES): measured room temperature values
- Dimmers (DIMAX): operational feedback related to load state and dimming behavior

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 the BLE central device or application logic, such as calculated setpoints, program evaluations, or schedule-based control decisions. These derived data are not generated by the BLE protocol 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.

BLE devices do not inherently process or store personal data. All exchanged data relates to building automation functions, device control, and status information. Any personal data processing depends on the connected application and not on the BLE communication itself.

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	BLE communication is based on Bluetooth Low Energy using the Generic Attribute Profile (GATT). A proprietary UART protocol is tunneled via dedicated GATT characteristics for receive (Rx) and transmit (Tx). The exchanged data represents structured messages for device configuration, sensor values, control commands, and scheduling information. Both standardized BLE mechanisms and proprietary application-layer formats are used.
Access method	BLE data exchange is initiated by a BLE central device within radio range and takes place locally via short-range wireless communication. Communication is point-to-point and active only during configuration, control, or status exchange. BLE devices do not automatically transmit data to any cloud system. If a mobile application, gateway, or backend system is connected to the BLE device, responsibility for any recording, storage, or onward transmission of data lies with that external system.
Timeliness	BLE communication is active only during advertising, connection, or data transfer phases. UART-over-GATT data packets are transient and are not persistently available after transmission.

5.1.6. Storage location and storage period

Storage location	Not applicable - BLE devices do not store operational or usage data beyond temporary internal states required for operation, unless explicitly designed to store configuration or scheduling data locally.
Storage period	Not applicable - No default persistent storage of operational or usage data is performed by BLE devices. Any locally stored configuration or schedule data remains available until overwritten or reset.
Deletion or anonymization concept	Not applicable - BLE devices do not use user accounts. Stored configuration or schedule data can be deleted by overwriting settings, resetting the device, or removing the associated application.