EU "Data Act" Transparency Statement

(English + Complete Version in French)

Version of the Declaration: V1.0
Version de la déclaration: V1.0

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Data processing entity: Creature Information(Guangzhou)Technology Co., Limited
Responsable du traitement: Creature Information(Guangzhou)Technology Co., Limited

Tax code: 91440101MA5CNG7271
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1. Data Categories & Generation Details

- Personal Data: Device-bound account information, login records, and location data (only collected if actively enabled by users). Purposes include account verification and regional service adaptation, compliant with Article 6 of GDPR.

- Non-Personal Data: Hardware operating parameters (CPU temperature, battery health), system logs, energy consumption data, and firmware versions. Used for device maintenance and performance optimization, adhering to the principle of data minimization.

- Data Volume: ≤200KB per day under active usage scenarios, ≤50KB per day in standby mode. Supported machine-readable formats: JSON/CSV (meeting interoperability standards).

- Exclusion Scope: Excludes AI-derived data, user-generated content (documents/videos, etc.), and trade secrets. No collection of data related to competitive product development.

2. Storage & Retention Rules

- Storage Location: Only stored on this device.

- Retention Period: During the product usage period + 90 days. Automatic and irreversible secure deletion upon expiration, in line with the Data Act's principles of data minimization and purpose limitation.

- Delegated Processing: Only authorized EU-compliant service providers are engaged, with signed Data Processing Agreements (DPA) clarifying data protection responsibilities of both parties.

3. User Data Rights & Operation Guidelines

- Access/Export: Go to 【System Settings > Privacy & Data > Data Management】, select the time range to submit a request. A download link will be generated within 24 hours (valid for 72 hours), free of charge.

- Third-Party Sharing: Designate third parties (e.g., repair services) in the Data Management section. Authorized data provision will be completed within 7 working days without additional fees. Third parties are prohibited from using data for unauthorized purposes.

- Data Erasure: Submit a deletion request through the system. Full irreversible data destruction will be completed within 7 working days.

- Complaint Channel: Complaints can be filed with the European Data Protection Board (EDPB) or the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali, GPDP). Official complaint link: https://www.garanteprivacy.it/it/comunicazioni-e-denunce.

4. Additional Notes

- This declaration is compliant with both Regulation (EU) 2023/2854 (Data Act) and GDPR (Regulation (EU) 2016/679) . Maximum fines for non-compliance: 4% of global annual turnover or €20 million (whichever is higher).

- Updates to the declaration will be notified via system pop-up and email. Failure to object within 7 days will be deemed acceptance of the new terms.

- Trade Secret Protection: Written applications for data confidentiality can be submitted via the consultation email. A formal response with legal basis will be provided within 7 working days.

Déclaration complète en français

1. Catégories de données et modalités de génération

- Données à caractère personnel : Informations de compte liées à l'appareil, historiques de connexion et données de localisation (collectées uniquement si l'utilisateur les a activées de manière explicite). Les finalités du traitement comprennent la vérification du compte et l'adaptation régionale des services, conformément à l'article 6 du GDPR.

- Données non personnelles : Paramètres de fonctionnement du matériel (température du CPU, état de santé de la batterie), journaux système, données de consommation énergétique et versions du firmware. Ces données sont utilisées exclusivement à des fins de maintenance de l'appareil et d'optimisation des performances, dans le respect du principe de minimisation des données.

- Volume de données : ≤200 KB par jour en cas d'utilisation active ; ≤50 KB par jour en mode veille. Formats lisibles par machine pris en charge : JSON / CSV (conformes aux normes d'interopérabilité).

- Périmètre d'exclusion : Sont exclus les données issues de systèmes d'intelligence artificielle, les contenus générés par l'utilisateur (documents, vidéos, etc.) ainsi que les secrets commerciaux. Aucune donnée relative au développement de produits concurrents n'est collectée.