Notifications for Data Act

- OMRON connect USCAN/EMEA –

Version 1.0 – Sep. 2025

These Notifications is made to fulfill noticing obligations based on the Data Act.

1. Notification for Connected Product

In accordance with Article 3(2) of the Data Act, the following information is provided.

(a) Type, format, and estimated volume of product data which the connected product is capable of generating;

1) Type of Product Data

(1) Data that you have measured with our products.

-1. Blood Pressure Monitor:
Systolic, diastolic, pulse, and other information on the product display (Including Track your activity, such as Steps, and Monitor your Sleep patterns)

-2. ECG
Electrocardiograph, Systolic, diastolic, pulse, atrial fibrillation, tachycardia, bradycardia, and sinus rhythm, and other information on the product display

-3. Body Composition Monitor:
Body fat percentage, body mass index (BMI), skeletal muscle, resting metabolism, visceral fat, body age, body weight, and other information on the product display

-4. Thermometer:
Body temperature including Basal body temperature, and other information on the product display

-5. Pulse Oximeter:
SpO2、pulse, and other information on the product display

※ For more information on OMRON connected devices, please refer to the 'FAQ and OMRON connect Support' on the web page at the following URL.
https://www.omron-healthcare.com/omronconnect
https://www.omron-healthcare.co.uk/omronconnect-support

(2) Meta Data

Data that structurally describe the contents or the use of data in (1) above facilitating the discovery or use of those data relevant to understand the conditions under which those data were collected and generated, including the data as to how, when, and whether those data readings were successfully transmitted and synchronized at the time of pairing, such as logs of transmission attempts, synchronization timestamps, and success/failure indicators.

We will provide it to you after taking the minimum necessary protective measures, such as masking. Where metadata may contain trade secrets or security-sensitive details, we will apply proportionate protective measures (e.g., redaction, aggregation, access controls) to protect such information while enabling access to the readily available data as required by the Data Act.

2) Data Format

Machine-readable CSV by default; human-readable PDF reports are also available. For export method:

- The data in (a) 1) (1) above can be exported by you from the App or;
- For the data in (a) 1) (2) above, please contact us as stipulated in 'COMMUNICATION' of Terms of Use.

3) Estimated Volume

Estimated Volume of data in (1) of 1) above is approximately 10 bytes to 20 KB per measurement.
Estimated Volume of data in (2) of 1) above is approximately 500 bytes to 2 KB per measurement.
The volume may vary depending on measurement frequency and device usage patterns. Furthermore, the amount of data output in CSV/PDF format may increase depending on the number of records.
(It is estimated that the data volume will not reach units of terabytes, petabytes or exabytes.)

(b) Whether the connected product is capable of generating data continuously and in real-time;

1) The data in (a) 1) (1) above:

Each time you take a measurement with the product, the product generates the data in real-time.

2) The data in (a) 1) (2) above:

It is generated in real time when pairing takes place or data is transferred between the connected product and the App.

(c) Whether the connected product is capable of storing data on-device or on a remote server, including, where applicable, the intended duration of retention;

Measurement data are stored on the user's device and in the OMRON connect cloud once synchronized via the App.
Operational metadata related to transmission/synchronization may be stored in our analytics environment operated by our contracted processors.
For information on the retention period for your personal data, please refer to the Privacy Statement.

(d) How the user may access, retrieve or, where relevant, erase the data, including the technical means to do so, as well as their terms of use and quality of service.

You may access such data or export or erase it through the OMRON connect App or its cloud services.

Please refer to the Terms of Use for quality-related information and the 'FAQ and OMRON connect Support' on the web page at the following URL.
https://www.omron-healthcare.com/omronconnect
https://www.omron-healthcare.co.uk/omronconnect-support

2. Notification for Related Service

In accordance with Article 3(3) of the Data Act, the following information is provided.

(a) The nature, estimated volume and collection frequency of product data that the prospective data holder is expected to obtain and, where relevant, the arrangements for the user to access or retrieve such data, including the prospective data holder's data storage arrangements and the duration of retention;

1) **Nature**

(1) Data relevant to your health condition and meta data relevant connected products;

(2) Model, serial number of connected product, and other data regarding the product as it appears on the connected products themselves or in the operating instructions and;

(3) Data that describe how, when, and whether those readings were successfully transmitted and synchronized at the time of paring, such as logs of transmission attempts, synchronization timestamps, and success/failure indicators.
For more information, please refer to the Terms of Use/Privacy Statement.

2) **Estimated Volume**

As stated in 1. (a) 3) above.

3) **Collection Frequency**

Basically, the data is collected every time connected products or the App is used.

4) **Arrangements for the user to access or retrieve the data, including data storage and duration of retention**

Basically, the data in (a) 1) above will be retrieved until the termination as stipulated in 'WE MAY END YOUR RIGHTS TO USE

THE APP AND THE SERVICE IF YOU BREAK THESE TERMS' in the Terms of Use.
For more information, please refer to the Terms of Use/Privacy Statement.

(b) The nature and estimated volume of related service data to be generated, as well as the arrangements for the user to access or retrieve such data, including the prospective data holder's data storage arrangements and the duration of retention;

1) **Nature**

(1) Data relevant to your health condition and data of your use of the App and other data required for service delivery.
For more information, please refer to the Terms of Use/Privacy Statement.

2) **Estimated Volume**

As stated in 1. (a) 3) above.

3) **Collection frequency**

Basically, the data is collected every time connected products or the App is used.

4) **Data Storage Arrangements and Duration of Retention**

Basically, the data in (b) 1) above will be collected until the termination as stipulated in 'WE MAY END YOUR RIGHTS TO USE THE APP AND THE SERVICE IF YOU BREAK THESE TERMS' in the Terms of Use.
For more information, please refer to the Terms of Use/Privacy Statement.

(c) Whether the prospective data holder expects to use readily available data itself and the purposes for which those data are to be used, and whether it intends to allow one or more third parties to use the data for purposes agreed upon with the user;

1) Whether the prospective data holder expects to use readily available data itself and the purposes for which those data are to be used:
We will use the data. Please refer to the Privacy Statement for the purposes.

2) Whether it intends to allow one or more third parties to use the data for purposes agreed upon with the use:
We will intend to allow one or more third parties to use the data.
For more information, please refer to the Privacy Statement

(d) The identity of the prospective data holder, such as its trading name and the geographical address at which it is established and, where applicable, of other data processing parties;

Please refer to the Terms of Use/Privacy Statement and the following URL.
https://apps.apple.com/us/app/omron-connect-us-can-emea/id1166317885
https://play.google.com/store/apps/details?id=com.omronhealthcare.omronconnect&hl=en_IN

(e) The means of communication which make it possible to contact the prospective data holder quickly and communicate with that data holder efficiently;

Please refer to the Terms of Use/Privacy Statement and the following URL.
https://apps.apple.com/us/app/omron-connect-us-can-emea/id1166317885
https://play.google.com/store/apps/details?id=com.omronhealthcare.omronconnect&hl=en_IN

(f) How the user can request that the data are shared with a third party and, where applicable, end the data sharing;

Please refer to please contact us as stipulated in the Terms of Use.

(g) The user's right to lodge a complaint alleging an infringement of any of the provisions of this Chapter with the competent authority designated pursuant to Article 37;

You have the right to lodge a complaint alleging an infringement of any of the provisions of Data Act. with the competent authority.

(h) Whether a prospective data holder is the holder of trade secrets contained in the data that is accessible from the connected product or generated during the provision of a related service, and, where the prospective data holder is not the trade secret holder, the identity of the trade secret holder;

We are the holder of trade secrets in the data that is accessible from the connected product or generated during the provision of a related service.

(i) The duration of the contract between the user and the prospective data holder, as well as the arrangements for terminating such a contract.

Please refer to the Terms of Use.

3. Notification for Data Processing Service

In accordance with Article 26 of the Data Act, the following information is provided.

(a) Information on available procedures for switching and porting to the data processing service, including information on available switching and porting methods and formats as well as restrictions and technical limitations which are known to the provider of data processing services;

In accordance with the EU Data Act, this notice provides information on the procedures available for porting your data and switching to another data processing service.

1) **Data Porting** (Exporting Your Data)

You can export your health and wellness data stored in the OMRON connect Cloud.

(1) Procedure:

You can export your data directly from the OMRON connect app. Please refer to the 'FAQ and OMRON connect Support' on the web page at the following URL.

https://www.omron-healthcare.com/omronconnect

https://www.omron-healthcare.co.uk/omronconnect-support

(2) Data Format:

The data will be exported in CSV/PDF format, which is a common, machine-readable format compatible with many applications.

(3) Available Data:

The exported file includes your measurement data such as [blood pressure, pulse, weight, body fat percentage, steps, etc.].
Please note that app settings and account information are not included in this export.

2) **Switching to Another Service**

OMRON connect does not offer a direct, automated switching service to transfer your data to a third-party data processing service.
To move your data to another service, you must first export your data from OMRON connect as described in Section 1, and then import that data into the new service. The ability to import data is dependent on the features and formats supported by the other service provider.

3) **Known Restrictions and Technical Limitations**

(1) Compatibility:

While CSV is a widely used format, we cannot guarantee that the exported data file will be fully compatible with or importable into all other services.
Compatibility depends on the data structure and import capabilities of the target service.

(2) Data Integrity:

You are responsible for ensuring the integrity and security of your data once it has been exported from our service.

(3) Scope of Export:

The data export function is limited to the measurement data stored in your OMRON connect account.
It does not include data that has not yet been synced to the cloud.

(b) A reference to an up-to-date online register hosted by the provider of data processing services, with details of all the data structures and data formats as well as the relevant standards and open interoperability specifications, in which the exportable data referred to in Article 25(2), point (e)*, are available.

(* An exhaustive specification of all categories of data and digital assets that can be ported during the switching process, including, at a minimum, all exportable data.)

1) **Data Structure**:

The data concerned is structured and stored as the information stipulated the Privacy Statement.

2) **Data Format:**

As stated in (a) 1) (2) above.

3) **The relevant standards and open interoperability specification**:

The service operates according to GDPR-compliant data protection standards, ISO/IEC 27001, and open interoperability specifications such as REST APIs.

Details such as data structure (CSV column definitions, data types, required/optional fields, etc.), character codes, date, and time formats, delimiters, and escape specifications may contain trade secrets or sensitive security information.

For inquiries regarding these matters, please contact us in accordance with ‘COMMUNICATION’ in the Terms of Use.

In accordance with Article 28 of the Data Act, the following information is provided.

(a) The jurisdiction to which the ICT infrastructure deployed for data processing of their individual services is subject;

As the ICT infrastructure deployed for data processing of OMRON connect Cloud services is built mainly in the EEA and the US, the infrastructure is basically subject to the jurisdiction of the EEA and the US.

(b) A general description of the technical, organizational, and contractual measures adopted by the provider of data processing services in order to prevent international governmental access to or transfer of non-personal data held in the Union where such access or transfer would create a conflict with Union law or the national law of the relevant Member State.

We consider the protection of your data to be of the highest priority.
Therefore, we have put in place multi-layered protection measures as follows.

Technical protection:

We encrypt data in transit and in storage and strictly control access.

Organizational control:

In the event of a request for data disclosure from a foreign government, we check the legality of the request and refuse or object to requests for which there is insufficient legal basis.

Contractual guarantees:

We also oblige our partners to whom we outsource data processing to take data protection measures through contracts.

We will use all reasonable efforts to protect your data within the scope of applicable regulations and law.

These Notifications are intended to comply with the Data Act as of the date of issuance. To further enhance transparency, we will update them as appropriate and supplement any information that may be necessary or newly required.