Pre-contractual information under the EU Data Act

EU Data Act Information
The EU Data Act (Regulation (EU) 2023/2854) applies to certain hardware products and associated services controlling those products, defined in the EU Data Act as "connected products" and "related services". This document provides information relevant to Apple's connected products and related services.

What types of data are generated during the use of your Apple connected product?

(1) Apple's connected products continuously generate data while in use to provide certain functionalities. This includes when you interact with your device directly (e.g. by pressing the volume button on the device) or through an app that controls how certain sensors or other physical parts of the device behave (e.g., using an app to produce a sound on a device or make the device vibrate).

(2) The types and volume of data generated during the use of Apple's connected products can vary, depending on the type of device, their software version, the functionalities of the device, your configurations and settings, and how you use them. This can include sensor data or operational status data, like battery health, pairing status, or network connectivity data.

(3) The raw sensor data your device generates during your interaction with your device is usually deleted immediately after being generated. The device subsequently uses inferred or highly processed data for ongoing functions, which are not subject to the EU Data Act. In addition, your device may collect analytics data, which can include certain technical details concerning the performance or your usage of your device (e.g. crash logs or performance metrics).

Where and for how long is the data stored and for which purposes is it used?

(4) Apple typically does not collect and retain on its servers raw sensor data that your device generates during your use of the device. Instead, a lot of processing happens on the device, where the relevant data is used to power certain features or functionalities. Most of the data concerning the use of an Apple connected product is either deleted immediately after being generated, or within a very short time frame, typically within 24 hours. Some limited data may be retained on your device for a few days, until it is overwritten by newer data, or deleted upon restart of your device.

(5) To the extent you choose to share your analytics data with Apple (and developers), this data is retained on Apple servers for two years, in a way that does not personally identify individual users, and is used for analytics purposes. Very limited data concerning your use of an Apple connected

product is shared with Apple in a way that would allow Apple to personally identify you. This data is retained on Apple servers only for so long as necessary to provide the services or functionalities you chose to use.

How can you access your data?

(6) To the extent Apple collects data related to your use of an Apple connected product in a way that personally identifies you, this data is available via the Apple Data and Privacy page at https://privacy.apple.com. To help protect the security of your data, you must sign in to your account and your identity will be verified. You can select the data you'd like to download and we'll prepare a copy for you. The data is provided in standard, readable digital formats. You can also choose to delete your Apple account and all data associated with your Apple Account via the self-service tool.

(7) Where data concerning the performance or your use of an Apple connected product is generated and retained on the device, e.g., your device analytics data, Apple provides tools that allow you to access and download your data. The data is accessible by way of structured files, each named by the app or system process and timestamp.

How can third parties authorized by you request access to your data?

(8) Where you choose to authorize a third party to access your data concerning your use of an Apple connected product on your behalf, the third party can submit a request to Apple. Apple and the requesting third party will agree on the arrangements of such access and the authorized third party will receive access to your data, to the extent this data is available to Apple in a way that allows us to identify you. You can see and end your authorised data transfers to third parties at any time, via Apple's Data and Privacy page.

How can you enforce your rights?

(9) If you have questions, you can contact Apple Distribution International Ltd., located at Hollyhill Industrial Estate, Hollyhill, Cork, Republic of Ireland at eudataact@apple.com.

(10) You also have the right to lodge a complaint with the relevant competent authority designated under Article 37 of the EU Data Act, in the Member State of your habitual residence, place of work or establishment.

With whom does Apple share your data?

(11) Apple may engage third parties to act as our service providers and perform certain tasks on our behalf, such as processing or storing data, including personal data generated and collected by Apple in connection with your use of

an Apple connected product. You can learn more by visiting https://www.apple.com/legal/privacy/.

How can you terminate your use of the services?

(12) You may use Apple's services for as long as you wish, unless you or Apple terminate the service. This includes services that you can use to control certain hardware functions of an Apple connected product. You can stop using the Apple's services at any time. To learn how to delete your Apple Account, please visit https://privacy.apple.com. If you delete your Apple Account, you will not have access to other Apple or third party products and services that you set up with that Apple Account. This action may be non-reversible.