



# **EU Data Act**

Information regarding HP Connected  
Products and Related Services

**Version 1.0**

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**Note:** This document is designed to meet the requirements of Articles 3(2) and 3(3) of the EU Data Act.

# Introduction

As a customer purchasing HP products in the European Union, you are entitled to specific rights under the EU Data Act (Regulation 2023/2854), a law that aims to facilitate and promote the exchange and use of data within Europe.

As part of HP's obligations under the EU Data Act, we are required to provide certain information to potential and future customers regarding the information that smart devices, which the EU Data Act refers to as "connected products", create and how you can access it, along with information about any related services.

Connected products include devices that can directly connect to the Internet. For example, a Wi-Fi enabled printer or Laptop. Data produced by devices such as headsets and mice which connect to a PC but do not access the Internet independently are not covered under this law.

Detailed descriptions of the data that HP will provide will be included in our response to any request regarding an owned device or devices.

The EU Data Act is separate from the General Data Protection Regulation (GDPR). To exercise your rights under the GDPR and make a request for personal data that HP holds about you, please visit this page and complete the form here: [HP Privacy feedback form](#).

If you wish to make a complaint about HP's response to the EU Data Act, please contact the relevant competent authority in your country of residence.

If you have any further questions that are not answered in this document, please contact HP support via our website <https://support.hp.com/>



# Information related to Connected / Smart Devices

**What types, formats and volumes of data can connected products generate?**

## **Data Types**

Detailed descriptions of the types of data that HP will provide will be included in our response to any request regarding an owned device or devices. Different devices produce significantly different types and volumes of data.

## **Data Format**

While HP devices use many different formats internally, we have standardized the format of information to be provided under an EU Data Act request to use the JavaScript Object Notation (JSON) Format.

## **Estimated Volumes of Data**

| Type of device                                | Estimated volume of data generated                                                            |
|-----------------------------------------------|-----------------------------------------------------------------------------------------------|
| Printers for home                             | Typically, kilobytes to megabytes per day, depending on usage.                                |
| Printers for work                             |                                                                                               |
| Large Format Printers                         |                                                                                               |
| Print Workflow Platform                       |                                                                                               |
| Scitex Printers                               |                                                                                               |
| Poly connected products                       |                                                                                               |
| Personal Computer and OMEN connected products | Depends significantly on product usage and features but can exceed tens of megabytes per day. |
| 3D Printers                                   |                                                                                               |
| Indigo Printers                               |                                                                                               |
| Scitex Printers                               |                                                                                               |

### Can connected products generate data continuously and in real-time?

HP products produce telemetry data when device events occur. In most cases, the data generated by these devices is sent off device to a cloud service.

Depending on the type of device, kilobytes to gigabytes of data may be stored locally before transmitting files to HP.

While consumer devices generally have limited local storage, commercial devices may have more depending on versions and features purchased.

| Type of device                                | Is real time data continuously generated? |
|-----------------------------------------------|-------------------------------------------|
| Printers for home                             | No.                                       |
| Printers for work                             | No.                                       |
| Large Format Printers                         | No.                                       |
| Print Workflow Platform                       | No.                                       |
| Scitex Printers                               | No.                                       |
| Personal Computer and OMEN connected products | No.                                       |
| 3D Printers                                   | No.                                       |
| Indigo Printers                               | No.                                       |
| Poly connected products                       | Yes.                                      |

**Are HP connected products capable of storing data on-device or on a remote server or both?**

| Type of device                                | Local data Storage | Remote data Storage | Intended duration of retention                                                                                                                      |
|-----------------------------------------------|--------------------|---------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|
| Printers for home                             | Yes.               | Yes.                | Limited data storage on device with no established retention period.                                                                                |
| Printers for work                             | Yes.               | Yes.                |                                                                                                                                                     |
| Large Format Printers                         | Yes.               | Yes.                |                                                                                                                                                     |
| Print Workflow Platform                       | Yes.               | Yes.                |                                                                                                                                                     |
| Scitex Printers                               | Yes.               | Yes.                | Retention period in cloud is dependent on a variety of factors including device type, telemetry type and whether the data is subject to legal hold. |
| Personal Computer and OMEN connected products | Yes.               | Yes.                |                                                                                                                                                     |
| 3D Printers                                   | Yes.               | Yes.                |                                                                                                                                                     |
| Indigo Printers                               | Yes.               | Yes.                |                                                                                                                                                     |
| Poly connected products                       | No.                | Yes.                | Telemetry data is not stored on Poly devices. If Poly Lens has been configured, data will be stored remotely in the Poly Lens system.               |

**How can users access and retrieve data from their devices?**

| Type of device                                | How can a user access or retrieve their data?                                                                                                                                                                                                                                                                                                          |
|-----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Printers for home                             | <p>HP's EU Data Act portal provides a means for authorized users of products located in EU countries to request and retrieve data from their devices. The link to this portal is: <a href="https://compliance-euda.hp.com/">https://compliance-euda.hp.com/</a></p> <p>Terms of use and quality of service information is available on the portal.</p> |
| Printers for work                             |                                                                                                                                                                                                                                                                                                                                                        |
| Large Format Printers                         |                                                                                                                                                                                                                                                                                                                                                        |
| Print Workflow Platform                       |                                                                                                                                                                                                                                                                                                                                                        |
| Scitex Printers                               |                                                                                                                                                                                                                                                                                                                                                        |
| Personal Computer and OMEN connected products |                                                                                                                                                                                                                                                                                                                                                        |
| 3D Printers                                   |                                                                                                                                                                                                                                                                                                                                                        |
| Indigo Printers                               | <p>To setup Poly connected products to access your data please visit this link: <a href="https://info.lens.poly.com/docs/compliance/">https://info.lens.poly.com/docs/compliance/</a></p>                                                                                                                                                              |
| Poly connected products                       |                                                                                                                                                                                                                                                                                                                                                        |

# Information related to data created by related services

For the purposes of the Data Act, ‘related service data’ means ‘data representing the digitization of user actions or of events related to the connected product, recorded intentionally by the user or generated as a by-product of the user’s action during the provision of a related service by the provider’. It does not include all data that HP may have about a user or device.

## **HP’s Workforce Experience Platform (WXP)**

<https://workforceexperience.hp.com/>

### **What is the nature, estimated volume and collection frequency of product and related service data that HP is expected to obtain?**

Depending on the number of devices enrolled by the enterprise, the size of the compressed (zipped) data will vary. For a medium-sized customer with 10,000 devices enrolled the size of the compressed file will be of the order of several Gigabytes.

When a customer makes a request for data, HP’s WXP will make available data collected from all devices enrolled in the past 24 hours.

### **How can users’ access or retrieve such data?**

The data can be downloaded from HP’s WXP portal for 30 days from the date of request.

### **What does HP expect to be able to use this data for?**

HP undertakes to use non-personal data only for purposes of:

1. performing an agreement with the User or activities related to such agreement (e.g. issuing invoices, generating and providing reports or analysis, financial projections, impact assessments);
2. providing support, alerts, timely firmware & software updates, warranty, guarantee or similar services or to assess User’s or third party’s claims (e.g. regarding malfunctions of the Connected Product) related to the Connected Product or Related Service;
3. monitoring and maintaining the functioning, safety and security of the Connected Product or Related Service and ensuring quality control;

4. improving the performance and functioning of any product or related service, solution, service or support offered by HP;
5. developing new products, features or services, including artificial intelligence (AI) solutions, by HP, by third parties acting on behalf of HP (i.e. where HP decides which tasks will be entrusted to such parties and benefits therefrom), in collaboration with other parties or through special purpose companies (such as joint ventures);
6. aggregating these Data with other data or creating derived data, for any lawful purpose, including with the aim of selling or otherwise making available such aggregated or derived data to third parties, provided such data do not allow specific data transmitted to HP from the connected product to be identified or allow a third party to derive those data from the dataset.

**Which legal entity is responsible for this related service?**

HP Inc.  
1501 Page Mill Road  
Palo Alto, CA 94304  
United States

HP's WXP product is hosted on Amazon Web Services.

**How should users contact HP if they have questions or wish to file a support request?**

Customers can file support requests through the WXP portal at the link above.

**How users can request that the data are shared with a third party and, where applicable, end the data sharing?**

HP allows any 3<sup>rd</sup> party to directly access their customers' data. Once a customer downloads their data from HP's WXP portal, they can share the data with a third party if that third party agrees to respect HP's data sharing terms that the customer has accepted.

**Who is the owner of any trade secrets contained within the data?**

The holder of any trade secrets contained in data produced by WXP is HP Inc.

**What is the duration of the contract between the user and HP, and how can the user terminate the contract?**

The duration is defined in the specific WXP contract the customer has signed with HP.

A customer can terminate the contract by sending an email to: [support@wxp.hp.com](mailto:support@wxp.hp.com) or through HP's WXP portal 'Contact Us' form by selecting category=Account.