

EU Data Act Transparency Declaration

Product: HomeWizard P1 Meter

Document type: EU Data Act Transparency Declaration

Version: [v1.0]

Last updated: [10-12-2025]

1. Data holder and contact

Data holder (manufacturer): HomeWizard B.V.

Address: Keyzerswey 79, 2201 CX Noordwijk, The Netherlands

Email: support@homewizard.nl

Support page (URL): <https://helpdesk.homewizard.com/en/>

Website: <https://homewizard.com>

2. Purpose of this declaration

This document describes:

- what data the HomeWizard P1 Meter generates and transmits
- whether the data is personal and or non-personal
- where the data is stored and for how long
- how users can access, retrieve, erase, and share the data
- who can access the data and for which purposes

This information is provided to meet transparency obligations under the EU Data Act for connected products.

3. Product and related services in scope

3.1 Connected product

Connected product name: HomeWizard P1 Meter

Model(s) / SKU(s): HWE-P1-AU | HWE-P1 | HWE-P1+CNV | HWE-P1+ADP

Intended use: Reads data from the smart meter P1 port and provides energy insights to the user via the HomeWizard app and related services.

3.2 Related services (if applicable)

The product uses the following related services:

- HomeWizard app (iOS/Android): Yes
- HomeWizard cloud services: Yes
- Web portal: Yes
- API: Yes
- Virtual assistant integration (e.g., Alexa, Google Assistant): No

4. Nature of the data generated and transmitted

The HomeWizard P1 Meter can generate and/or transmit the following categories of data.

4.1 Product status data (device and diagnostics)

Examples (non-exhaustive):

- Device identifier (e.g., serial number, internal device ID)
- Firmware version
- Connectivity status (e.g., Wi-Fi status, signal strength)
- Device configuration and settings
- Diagnostic information (e.g., error codes, crash reports, uptime, restart events)
- Security-related events (e.g., authentication errors) Yes

The exact fields may vary by firmware version and troubleshooting needs. We minimize diagnostic data and apply access controls.

4.2 Usage data (user interaction)

Examples (non-exhaustive):

- App interaction events (e.g., opening views, changing settings)
- Feature usage (e.g., enabling notifications, selecting views)

- Account linkage status (paired/unpaired)
- Timestamps of interactions

Usage data is collected as needed to provide and improve the service and may be limited depending on user settings and applicable consent requirements.

Geolocation data:

The product or related services collect geolocation data: Yes

If Yes, specify what is collected, when, and why: The HomeWizard app may request location permission during installation. If you grant it, the app can access your precise location and the name of your Wi-Fi network (SSID) via your phone's location services. This happens only during setup and only with your consent. The purpose is to pair and configure the device correctly and to enable the associated services, such as the in-app installation flow and connectivity.

4.3 Meter and energy measurement data (from the P1 interface)

Depending on the connected smart meter, this may include:

- Current power usage and or feed-in (W)
- Energy consumption totals (kWh) and meter readings
- Tariff information (e.g., T1/T2) if available
- Gas meter readings if available and enabled

4.4 General environment data

The product generates or collects general environment data (e.g., weather): No

If Yes, specify: -

5. Estimated data volume

The actual data volume depends on configuration, sampling intervals, and usage.

5.1 Data generated through user interaction

Estimated typical volume: Between 3gb and 10gb on monthly basis per user.

5.2 Data generated while operating (including standby)

Sampling interval for meter data: 1s to 60s and everything in between.

Estimated typical volume: roughly 100mb per day per device.

Data generated when the product is switched off:

The product generates data when switched off: No

6. Data format

- Internal processing/storage format: none
- Export formats available to users: CSV & JSON
If exports are available, specify: The local API is in json, we offer an additional CSV export for easier data analysis, both have a different purpose (e.g. data analysis, data driven automation).

7. Continuous and real-time data generation

The product can generate data:

- continuously: Yes
- in real time (near real time): Yes

Explain any limitations (network, app refresh, etc.): Data is generated continuously by the device and transmitted when connectivity is available. Near real time updates depend on the device's network connection, cloud availability, and background restrictions on the user's phone. In the app, values may refresh on open or at set intervals, and can be delayed when the phone is in low power mode, the app is in the background, or the connection is unstable. Historical data will sync once the device reconnects.

8. Where the data is stored

8.1 On-device storage

The product stores data on the device:

- temporarily (buffer/cache): Yes
- long-term: No

The device may store data temporarily for operational purposes (for example buffering during connectivity interruptions). This data is overwritten automatically and is not intended for long-term storage

8.2 Remote storage (servers/cloud)

Data is stored on remote servers:

- for core functionality (app sync, history, insights): Yes
- for diagnostics/support: Yes

Primary storage location(s): EU

Cloud provider(s)/processor(s): Google LLC

Sub-processors list:

Sub-processor	HQ	Dataprocessing location
Google Inc	Mountain View, Californië	St. Ghislain, Belgium – Google Data Center
MongoDB, Inc.	New York City, Verenigde Staten	St. Ghislain, Belgium – Google Data Center
Intercom, Inc.	San Francisco	Dublin, Ierland
Exact Software Nederland B.V.	Molengraaffsingel 33, 2629 JD Delft, Nederland	Nederlandse servers, adres onbekend
Mollie BV	Keizersgracht 126, 1015 CW Amsterdam	Nederlandse servers, adres onbekend
QLS Fulfilment B.V.	Kerkeplaat 11 3313 LC Dordrecht, Nederland	Nederlandse servers, adres onbekend

9. Retention period (how long data is kept)

Unless otherwise required by law, we retain data as follows.

- Meter and measurement data: As long as the account is active. After account closure, retained for a reasonable period where necessary for legal obligations.
- Device status and diagnostics logs: Up to 30 days, unless a longer period is required to resolve an ongoing support case or meet legal obligations.
- Usage data: As long as the account is active.
- Account data: As long as the account is active. After account closure, retained for a reasonable period where necessary for legal obligations.
- Backups: Up to 30 days.
Legal retention exceptions (if any): We may retain specific data longer where required or permitted by law, to enforce our terms, resolve disputes, prevent fraud or comply with regulatory, accounting or tax obligations.

10. Who has access to the data

10.1 User access

Users can access their data through:

- HomeWizard app: Yes, path: Open application > Click on any desired graph
- Web portal: Yes, URL: <https://hwenergy.app/overview>
- API: Yes, documentation: <https://api-documentation.homewizard.com/>

10.2 HomeWizard access

Authorized HomeWizard personnel may access certain data on a need-to-know basis for:

- customer support and troubleshooting
- service operation and maintenance
- security and fraud prevention
- product improvement and analytics: Yes
If Yes, specify whether aggregated/anonymized where possible: Where possible, data is analyzed in aggregated and or anonymized form. Access to identifiable data is restricted to authorized personnel on a need to know basis, for example to investigate incidents, ensure service reliability, prevent abuse, or handle support requests.

10.3 Third parties (processors)

We may use third-party service providers (processors) for hosting, monitoring, and support tooling. Access is limited and governed by contracts and access controls.

Processors/sub-processors:

Sub-processor	HQ	Dataprocessing location
Google Inc	Mountain View, Californië	St. Ghislain, Belgium – Google Data Center
MongoDB, Inc.	New York City, Verenigde Staten	St. Ghislain, Belgium – Google Data Center
Intercom, Inc.	San Francisco	Dublin, Ierland
Exact Software Nederland B.V.	Molengraaffsingel 33, 2629 JD Delft, Nederland	Nederlandse servers, adres onbekend

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11. How users can access the data (Access)

Describe the user-facing access method:

1. Open the “HomeWizard” application.
2. Tap on any graphs you would like to access data from.

If access is provided via an API/portal, describe it:

1. Connect your Device to Wi-Fi
2. Go to the HomeWizard app. Go to “Settings” > “Meters” > “Your meter”, and turn on “Local API”.

12. How users can retrieve/export the data (Retrieve)

Users can retrieve their data by:

1. Open the “HomeWizard” application.
2. Go to “Settings” > “Graphs” > “Choose graph” > “Export graph data”.

Export delivery method: direct download or email

Export format(s): CSV

Expected timeframe (if not immediate): -

13. How users can erase the data (Erase)

Users can request erasure in the following ways:

- In-app deletion: Yes, steps: “Settings” > “Devices” > "Device' > “Options” > “Delete graph data”.
- Account deletion: Yes, steps: “Settings” > “Account” > “Delete account”.
- Support request via email: support@homewizard.nl

Identity verification steps (for security): We verify the requester's identity to prevent unauthorized deletion. We typically verify that the request is made from the email address linked to the HomeWizard account.

Erasure timeline: We process erasure requests without undue delay and normally within 30 days after verification of the request. If the request is complex or multiple requests are received, this period may be extended where permitted by applicable law, and we will inform the user accordingly.

Exceptions (legal/security): We may retain specific data where required or permitted by law (for example tax, accounting, regulatory obligations), to establish, exercise or defend legal claims, to enforce our terms, to prevent fraud and abuse, or to maintain security.

14. Data use purpose (related services)

We use data for the following purposes:

- providing product functionality and energy insights
- operating and securing the service
- improving product and service quality
- customer support

Reference to Privacy Policy section(s): <https://www.homewizard.com/privacy-policy/> + "What personal data do we process and why?"

15. Sharing data with third parties (data recipient chosen by user)

We allow sharing with third parties:

- via user-enabled integrations: No
- via explicit user request (portable export): No

16. Trade secrets

Trade secrets may be present in accessible data: No.

17. Contract duration and termination

Contract duration: until the user terminates their account.

18. Terms of use and policies

- Terms of Use: <https://www.homewizard.com/terms-and-conditions/>
- Privacy Policy: <https://www.homewizard.com/privacy-policy/>
- Sub-processors / data processing information:
<https://www.homewizard.com/privacy-policy/>
- Security information (if public):
<https://helpdesk.homewizard.com/en/articles/5935918-how-is-my-energy-data-stored>

20. Right to lodge a complaint

Users have the right to lodge a complaint with the competent authority in case of an infringement of obligations under Chapter II of the EU Data Act. For questions about your rights, you may also seek legal advice.

Appendix A. Change log

- [10-12-2025] v1.0 Initial version
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