

## EU Data Act Transparency Declaration

### Complete QWatch Pro Smartwatch (with Companion App) Data Governance Solution

Based on the core functionalities of the QWatch Pro smartwatch and its companion app—including health monitoring, activity tracking, and message synchronization—this solution provides a compliant and actionable framework. It comprehensively addresses data classification, volume, format, real-time requirements, storage, retention, access, retrieval, deletion, terms of use, and service level agreements.

#### I. Data Classification (Including Personal / Non-Personal Data Definitions)

Data Type	Specific Data Points	Nature & Ownership	Description & Context
Product Status Data	Firmware version, watch configurations (watch face, reminders), diagnostic logs (battery, Bluetooth connection), operational status (sensor health), maintenance data (charge cycles, error codes).	Non-Personal Data (when anonymized and not linked to an identity).	Generated and logged locally on the watch in real-time; synchronized to the companion app and cloud servers.
User Activity & Biometric Data	Activity timestamps (start/end), activity type (e.g., run, sleep), GPS route data, physiological metrics (heart rate, steps,	Personal Data (directly linked to a user account). Core sensitive data.	Collection requires explicit user consent. Forms the primary dataset for health and fitness insights.

	calories, sleep stages, SpO <sub>2</sub> ).		
Environmental & Contextual Data	Local weather conditions (temperature, humidity), air quality index (AQI) fetched by the app.	Non-Personal Data (aggregated or sourced from third-party APIs).	Used to provide contextual information for activity analysis and user notifications.
Account & Device Identity Data	Unique device ID (UDID), app account credentials (username/email), bound phone number.	Personal Data (used for authentication and binding).	Essential for creating and securing the user account, and pairing the device to the correct profile.

## II. Estimated Data Volume & Throughput

### Daily User-Generated Data:

**Basic Metrics:** Continuous heart rate (sampled at 1/min), step count, etc. Approx. 50–100 KB per day.

**Exercise Session:** GPS track (e.g., 1-hour outdoor run) ~500 KB–1 MB; detailed activity report with multi-sensor data ~1–2 MB.

**Sleep Analysis:** Full-night sleep stage and quality data ~20–50 KB.

### System & Background Data:

**Standby Mode:** Periodic heartbeat and status packets (every 5-15 mins), each ~100-300 bytes. Totals ~0.1–0.3 MB/day.

**Powered Off:** No data transmission. Only static configuration data persists locally.

### III. Data Formats & Real-Time Requirements

#### Data Formats

Data Category	Primary Format(s)	Purpose & Notes
Activity/Biometric Data	JSON, CSV	Structured for easy app parsing, cloud analytics, and user export.
Configuration/Log Data	XML, Binary (Protobuf)	Efficient for device-level communication and storage.
Location Data	GPX, WKT	Standard formats for mapping and route visualization.
Notification Data	Lightweight JSON, Plain Text	For syncing call, message, and app alert previews to the watch.

#### Real-Time Data Generation Profile:

**Continuous Stream:** Data like live heart rate and GPS coordinates during workouts are generated and synced in real-time (1-sec to 1-min intervals).

**Periodic/Batched:** Device status updates are sent at defined intervals during standby.

#### IV. Data Storage Locations & Retention Policies

Storage Tier	Data Stored	Retention Policy
On-Device (Watch)	Recent sensor logs, cached activity data, user settings.	Until factory reset or successful sync to the app.
Companion App (Mobile)	Full synced user history, preferences, cached media.	Retained until app uninstallation or manual cache/data clearing by the user.
Cloud Servers (Remote)	Complete, account-associated historical data.	Retained for 24 months from last activity by default. User can request earlier deletion. Data is anonymized or purged after retention.
Integrated Third-Party Platforms (e.g., Apple Health, Google Fit)	Data types explicitly authorized by the user for sharing.	Governed by the respective platform's privacy policy and retention schedule.

#### V. User Rights: Access, Retrieval, and Deletion

##### Methods for Data Access:

Primary Access: Via the QWatch Pro companion app's dashboard and detailed report screens.

Programmatic Access (API): Available for authorized third-party health and wellness apps (OAuth 2.0 flow).

Web Portal: Not currently offered; the mobile app serves as the primary interface.

Process for Data Retrieval (Export):

Log into the QWatch Pro app.

Navigate to "Health Reports" or "Activity History".

Select a date range and specific activity/sleep record.

Use the "Export" or "Share" function to generate a report in CSV or JSON format.

Prerequisite: Users must acknowledge the app's Privacy Policy and Data Terms upon first use and before exporting sensitive data.

Process for Data Deletion:

Internal Governance: Strict adherence to data protection principles (e.g., GDPR/CCPA). Deletion is permanent and includes backups.

User Actions:

Selective Deletion: In the app, go to Settings > Privacy > Manage My Data to delete specific records.

Account Deletion: Request account deletion via the app's "Account Center" or by contacting support. Full data purging is completed within 7 business days.

Third-Party Data: Data shared with platforms like Apple Health must be deleted separately within those ecosystems.

Terms of Use / End User License Agreement (EULA):

Terms of Use

Key Clauses: Defines scope of data collection, usage rights, third-party sharing policies, and user responsibilities.

Service Quality (API/SDK Specifications):

API Performance: RESTful APIs for data sync (HTTPS). Average response time <500 ms, uptime SLA  $\geq$  99.9%.

SDK Support: Bluetooth SDKs for Android (BLE) and iOS (Core Bluetooth). Comprehensive documentation reduces integration effort to <1 business day.

Support & Maintenance: 24/7 system monitoring. Incident response time <2 hours for critical issues. Regular SDK updates ensure compatibility with latest OS versions.