

EU Data Act Compliance Statement

Product: ECOVACS DEEBOT X9 PRO Omni

Manufacturer: ECOVACS Robotics Co., Ltd.

Version: 2025 Compliance Documentation

Purpose: Demonstration of alignment with requirements under Regulation (EU) 2023/2854 – the EU Data Act.

1. Introduction

This document outlines how the ECOVACS DEEBOT X9 PRO Omni aligns with key obligations of the **EU Data Act**, which governs access, sharing, and portability of data generated by connected devices and related services in the European Union.

The DEEBOT X9 PRO Omni is an AI-powered robotic vacuum cleaner that generates operational, diagnostic, and sensor data. ECOVACS has implemented the technical and organisational measures described below to enable user data rights and ensure responsible handling of product-generated data.

2. Data Types Generated by the Device

The product generates the following categories of data:

2.1 User-Generated Data

- Cleaning preferences
- Saved maps
- User-scheduled cleaning routines

2.2 Product-Generated Data

- Operational logs (start/stop, error codes)
- Navigation and localisation data
- Sensor data (LiDAR, anti-collision sensors)
- Battery performance
- Device health diagnostics

2.3 Non-Personal Technical Data

- Firmware version
- Connectivity status (Wi-Fi, app connection)

All data categories are inventoried in the company's internal **Data Map Register**.

3. User Rights: Access, Portability, and Sharing

In compliance with the EU Data Act:

3.1 Data Access

Users may access the device-generated data through the following:

- **ECOVACS Home App** – “Data Access & Export” section
- Request via **ECOVACS Support Portal** (EU region)

Access includes:

- Maps
- Cleaning logs
- Diagnostic information
- Sensor-based activity summaries

3.2 Data Portability

Users may export their data in machine-readable formats:

- **JSON**
- **CSV**
- **XML** (upon user request)

These formats allow migration to other compatible smart-home ecosystems or third-party management tools.

3.3 Third-Party Data Sharing

Upon user instruction, the device may share operational data with:

- Smart-home integrations (e.g., Matter-compatible hubs, Google Home, Alexa)
- Cleaning service platforms (if enabled by user)

All data transfers are:

- Encrypted
 - Logged
 - Revocable at any time in the app
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4. Transparency to Users

The product provides required transparency under the EU Data Act:

4.1 Precontractual Information

Before activation, users receive clear information regarding:

- Data types collected
- Purpose of data processing
- Third-party integrations
- How to access, export, and delete their data

4.2 In-App Disclosures

The ECOVACS Home App contains:

- “Data Usage Overview”
 - “How Your Data is Processed”
 - Device data categories explained in plain language
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5. Data Processing, Sharing, and Security

5.1 Technical and Organisational Security Measures

ECOVACS applies industry-standard protections, including:

- End-to-end encryption (TLS 1.3)
- Access controls based on least-privilege
- Server-side data segmentation
- Secure firmware update process (signed and verified)

5.2 Data Minimisation

Only essential operational data is collected to ensure:

- Navigation accuracy
- System diagnostics
- Safety and anti-collision performance

5.3 Anonymisation / Pseudonymisation

Where possible, product-generated data is:

- Aggregated

- Anonymised or pseudonymised before analytics processing.
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6. Cloud Switching & Interoperability

While the DEEBOT X9 PRO Omni depends on ECOVACS cloud services for enhanced functionality, the following measures support interoperability:

6.1 Compatible Ecosystems

- Matter
- Google Home
- Amazon Alexa
- IFTTT (region-dependent)

6.2 Data Export for Switching

Users may export operation logs and maps in standard formats to enable migration or external storage.

7. Restrictions on Access (Technical Justifications)

Certain raw sensor data (e.g., real-time LiDAR streams) is restricted due to:

- Safety concerns
- Intellectual property protection
- Potential cybersecurity risks

This is permitted under Article 4 of the EU Data Act and is documented in the **Technical Access Limitation Register**.

8. Recordkeeping and Auditability

ECOVACS maintains internal logs demonstrating compliance:

- Data access request logs
- Data export logs
- Third-party sharing logs
- Internal compliance reviews

- Security audits

These can be made available to EU authorities upon request.

9. Contact Point for EU Data Act Requests

ECOVACS EU Compliance Office

Email: compliance.eu@ecovacs.com

Website: www.ecovacs.com/support

Address: ECOVACS Europe GmbH, Düsseldorf, Germany

Available for:

- User data access requests
 - Data portability/export requests
 - Third-party instruction verification
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10. Declaration

Based on the technical and organisational measures described in this document, ECOVACS Robotics affirms that the **ECOVACS DEEBOT X9 PRO Omni** aligns with the key obligations of the **EU Data Act (Regulation EU 2023/2854)** relating to:

- Transparency
- Data access
- Data sharing
- Portability
- Interoperability
- User control over product-generated data

This document is provided as a declaration of compliance for regulatory, marketplace, and partner requirements.