

## **EU Data Act Transparency Declaration**

**Product: Garmin vívoactive 5 (42 mm) GPS Smartwatch**

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### **1. General Product Information**

**Product Name: Garmin vívoactive 5**

**Device Type: GPS Smartwatch / Fitness & Health Tracker**

**Display: 1.2" AMOLED Touch Display**

**Battery Life: Up to 11 days (smartwatch mode)**

**Positioning: GPS, GLONASS, Galileo**

**Connectivity: Bluetooth, Wi-Fi**

**Payment Function: Garmin Pay (NFC)**

**Music Storage: On-device music storage**

**Compatibility: Android and iOS**

**Intended Use: Fitness tracking, health monitoring, navigation, communication and contactless payment**

**This product qualifies as a connected wearable device within the meaning of the EU Data Act (Regulation (EU) 2023/2854).**

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### **2. Categories of Data Generated**

**During operation, the Garmin vívoactive 5 may generate and process the following categories of data:**

#### **Device Data**

- **Power status and battery level**
- **Firmware and software version**
- **Device identifiers**
- **Sensor calibration data**
- **Error and diagnostic logs**

#### **Health & Fitness Data**

- **Heart rate**
- **Blood oxygen saturation (SpO<sub>2</sub>)**
- **Sleep tracking data**
- **Stress and body battery metrics**

- Activity and workout records
- Step count, calories, distance

#### **Location & Movement Data**

- GPS location and route tracking
- Speed, pace and elevation data

#### **Connectivity & Usage Data**

- Bluetooth and Wi-Fi connection status
  - Paired device identifiers
  - App usage data
  - Music playback data
  - Garmin Pay transaction authentication metadata (no payment card numbers stored)
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### **3. Data Ownership and Access Rights**

#### **In accordance with the EU Data Act:**

- The user is the primary owner of all personal, fitness and usage-related data generated by the device.
- The user has the right to access, retrieve and port their data.
- The user may request transmission of their data to third-party service providers.

#### **Access to user data is provided via:**

- Garmin Connect mobile application
  - Garmin Connect web portal
  - Local device interface
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### **4. Data Sharing and Transmission**

#### **Data may be transmitted to:**

- Garmin Connect cloud services (if enabled by the user)
- Paired smartphone (Android / iOS)

- **Third-party fitness platforms (if explicitly connected by the user, e.g. Strava, MyFitnessPal)**

**Garmin Pay transactions are processed via certified payment partners. Payment card data is encrypted and not accessible to Garmin.**

**No personal data is shared with third parties without explicit user consent, except where legally required.**

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## **5. Data Storage and Retention**

- **Fitness and health data is stored locally on the watch and synchronized to the Garmin Connect account (if enabled).**
- **Cloud data is stored on Garmin servers in GDPR-compliant regions.**
- **Data is retained until deleted by the user.**

**Users may delete their data at any time via the Garmin Connect app or by performing a factory reset.**

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## **6. Interoperability and Portability**

**The Garmin vívoactive 5 supports interoperability with:**

- **Android and iOS smartphones**
- **Garmin Connect ecosystem**
- **Third-party fitness platforms**
- **Bluetooth headphones and accessories**

**User data can be exported in structured, machine-readable formats (GPX, CSV, FIT, JSON) via Garmin Connect.**

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## **7. Security and Data Protection Measures**

**Garmin applies industry-standard security measures including:**

- **Encrypted Bluetooth and Wi-Fi communication**
- **Secure device authentication**
- **Encrypted cloud data storage**
- **Secure payment tokenization (Garmin Pay)**

- Regular firmware and security updates
  - GDPR-compliant infrastructure
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## **8. User Rights under the EU Data Act**

Users have the right to:

- Access device-generated data
- Request data portability
- Restrict or disable cloud synchronization
- Delete stored data
- Object to non-essential data processing

Requests may be submitted via Garmin customer support or the Garmin Connect account portal.

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## **9. Manufacturer Contact Information**

**Manufacturer:**

Garmin Ltd.  
Mühlentalstrasse 2  
8200 Schaffhausen  
Switzerland

**EU Data Act & Privacy Contact:**

<https://www.garmin.com/privacy>

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## **10. Compliance Statement**

This product complies with the requirements of the EU Data Act (Regulation (EU) 2023/2854) and the General Data Protection Regulation (GDPR).

The manufacturer ensures transparency, data security, lawful processing and full user control over all data generated by this connected smartwatch.

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**Declaration Version: 2026-01**

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