



Data access policy in accordance with Regulation (EU) 2023/2854

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F&F devices – **Fox** line Wi-Fi controllers generate data referred to in EU Regulation 2023/2854 (Data Act).

In accordance with Regulation (EU) 2023/2854, we confirm that:

- We do not collect any data for the purpose of sharing it with third parties.
- The data collected and processed is used solely to ensure the functionality of the solution and to enable users to use the devices, mobile application and access telemetry data.
- We do not impose any restrictions on users that prevent them from accessing their data.
- We provide a mechanism that allows users to delete their user account along with all registered data.
- We will provide interfaces that allow users to download their registered data.

What data is recorded by the devices

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|-------------------------|---|
| Basic data: | configuration, current device status. |
| Telemetry data: | current data related to energy consumption measurement and electrical network parameters. |
| Diagnostic data: | recorded by the device at the user's request and only for a period specified by the user, enabling analysis of the device status in order to provide technical support to the user. |

How much data is generated and how long is it available

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|-------------------------|--|
| Basic data: | generated with each change of status or configuration; available only in real time, transmitted directly to the Fox application or used for sharing via the RestAPI or MQTT mechanism. This data is not stored in the device's non-volatile memory. |
| Telemetry data: | telemetry data is recorded in the manufacturer's cloud, data on energy consumption and usage is generated every 15 minutes and available to the user for a minimum of 10 years from the start-up of the device, data on electrical network parameters (voltage, power, currents) is generated every 3 minutes and stored for a period of 3 months. |
| Diagnostic data: | generated for each event defined by the user as an action trigger in the device settings. Event information is stored in the cloud until the user deletes their account. |

Where does the data go?

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|-------------------------------------|--|
| To the manufacturer's cloud: | only when the cloud option is enabled (enabled by default, the user can disable it). |
| To the mobile application: | only when the device interacts with the application. |

How can the user download data

Telemetry data recorded in the cloud: via the export option available on the website.

Current device status: via

- RestAPI (http://fox-updater.fhome.pl/rest_api_doc/)
- MQTT (<https://www.home-assistant.io/integrations/mqtt/>) interfaces.

Event data via mobile application

Data format

Telemetry data: when using the manufacturer's cloud – data saved in CSV/XLSX format.

Current device status: RestAPI – text data, json format,
MQTT – text data, json format – compatible with Home Assistant.

Infrastructure and data processing when using the manufacturer's cloud

- Data processed in the manufacturer's cloud is stored exclusively on servers located in the European Union.
- Apart from the email address used as the user account ID, no sensitive user information is stored on the servers.
- Data transmission is encrypted using AES128. The connection between the mobile application and the device uses end-to-end encryption. The server acts as an intermediary establishing the connection – it does not participate in encryption and has no access to the exchanged data.
- Except for the case described in the Diagnostic Data section, no data enabling the identification of the status of the device and the devices connected to it is recorded in the cloud.
- Infrastructure providers only provide server resources and do not have access to the content of the data.
- Data that needs to be retained for security reasons is covered by backup mechanisms. Backups are also stored on servers located in the European Union.
- F&F does not share the collected data with third parties.

Integrations

- The manufacturer provides the possibility of cloud-to-cloud integration with partners (e.g. voice assistant manufacturers).
- Integration is always initiated by the user, who is informed during the process that the partner has been granted access to their devices.
- Once integration is launched, data is transferred on an ongoing basis to the partner selected by the user. The user can interrupt the integration at any time from the application menu.

Access and transfer

- The user has complete freedom to use and download data generated by their devices.
- The manufacturer has access to the data only to the extent necessary to provide the service.
- The user may transfer data to external systems:
- Basic data:
 - using the RestAPI interface (http://fox-updater.fhome.pl/rest_api_doc/),
 - using the MQTT interface (<https://www.home-assistant.io/integrations/mqtt/>).
- Telemetry data:
 - using the manufacturer's cloud – export in formats that are easy to process (CSV/XLSX) by external systems.

Software update

F&F provides a mechanism for updating device firmware. The update system is based on an encrypted TLS connection. The update file is digitally signed with a certificate. The authenticity of the software is verified by a secure boot mechanism when the device is started. The contents of the device memory are encrypted using a hardware mechanism.



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Company stamp

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