



EU Data Act Declaration

(In accordance with EU Data Act (Regulation (EU) 2023/2854))

Express LUCK Europe Electric Kft., as the manufacturer of Smart TV products, hereby issues this declaration in accordance with the requirements of the above-mentioned regulation.

We are committed to ensuring transparency regarding data generated by our connected products and to enabling users to effectively exercise their rights under applicable EU legislation.

1. Categories of Applicable Data

The following categories constitute the data generated during the use of Smart TVs and related services within the scope of this declaration:

- **Product Usage Data**

Data relating to the use of device functionalities, including usage logs, application operations, feature activation history, and system interactions.

- **Service Usage Data**

Data generated through interaction with user interfaces and services, including navigation records, in-application activities, and interface interaction events.

- **Automatically Collected Data**

Data generated automatically by the device, including but not limited to system status, error codes, device diagnostics, connection status, and relevant operational parameters.

2. Important Note

Our Smart TVs may operate on different operating systems, including but not limited to:

- WebOS Hub
- Google TV / Google OS
- VIDAA OS
- Whale OS

The exact types, volume, format, and storage of the data depend on the operating system installed on your television.

3. Exercise of Data Rights

Users may exercise their rights of access, data portability, and deletion by providing the following information:

- Exact product model (e.g., 55ST1234)
- Operating system (visible in Settings > About This TV)
- Serial number (optional)

Requests may be exercised through the respective portals:

- WebOS Hub: <https://privacy.lg.com> → My Data section

Data Act Required Point	LG Electronics Information (Smart TV webOS + connected products)
Type of data generated	Data generated continuously and in real time while using the product: • Product data: usage logs, device status, sensor data, error codes, diagnostics, Device ID, IP/MAC address, Advertising ID • Smart TV specific: viewing history (live TV, LG Channels), app usage and feature execution history, usage of services (LG Movies & TV, webOS Pay, games, search, etc.) • Associated service data: voice command history, photos/videos (if feature enabled), LG account information
Who is the data holder	LG Electronics Inc. (Headquarters: Seoul, South Korea) is the data holder (technical holder) and the data controller. The end user is recognized as the owner of the data generated by their product.
How the user can access the data, transfer it, delete it, etc.	<u>Via the My Data portal on https://privacy.lg.com (after logging in with your LG account): • View the list of services and products connected to your account • Request provision of the data (CSV or PDF format, estimated volume 100 KB to 100 MB) • Request transfer (portability) to a third party • Request deletion or restriction of processing • Manage consents and cancel services → You can make these requests at any time, with no mandatory commitment period.</u>
Other important Data Act transparency points	• Data is stored both on the device and in the LG cloud • Real-time access possible (where technically feasible) • LG does not share trade secrets, copyrighted content, or public safety data • Security: encryption, access control, monthly audits

Data Act Required Point	Google (Google TV / Google OS) Information
Type of data generated	Data generated continuously and in real time while using the device: • Device data: device model, OS version, settings, IP/MAC address, Advertising ID, crash reports, system activity • Usage & activity data: installed apps, app usage history, interactions with Google services • Viewing & content data: watch history (live TV, YouTube, Google TV apps), search history, watchlist, recommendations • Voice & audio data: voice commands ("Hey Google"), audio recordings (if Assistant is enabled) • Sensor & location data: Wi-Fi access points, Bluetooth, GPS (if available)
Who is the data holder	Google LLC (USA) is the main data controller and technical data holder. For users in the European Economic Area: Google Ireland Limited acts as the data controller for most Google services (including Google TV).
How the user can access the data, transfer it, delete it, etc.	<u>Via your Google Account</u> (no separate "My Data" portal needed): • View all activity → myactivity.google.com (includes TV viewing & app usage) • Request provision/export of data → Google Takeout (download in portable format, e.g. JSON/CSV) • Request transfer/portability to a third party (via Takeout) • Request deletion → delete by date/service/all via My Activity, or delete specific services / entire account at myaccount.google.com • Manage consents & auto-delete (3/18/36 months) via Activity Controls
Other important Data Act transparency points	• Data is stored on the device (local cache) and in the Google cloud (global servers) • Real-time access possible via My Activity • Google does not sell personal data • Data is used for service improvement, personalization and ads (you can pause Web & App Activity or reset Advertising ID directly on the TV) • Full compliance with GDPR and EU data rights

·VIDAA OS: <https://www.vidaa.com/data-act-notice/>

Data Act Required Point	VIDAA Information (Smart TV VIDAA OS + Smart Remote + VIDAA Smart TV App)
Type of data generated	Data generated continuously and in real time while using the product: • Device & configuration data: Device ID, Customer ID, Model ID, OS version, region, language, parental controls, network (IP address, Wi-Fi SSID hashed, Bluetooth pairing), HDMI-CEC status • Telemetry & diagnostics: Click events (app launch, button press), browsing logs, timestamps, error logs • Viewing & usage data: Watching history, TV on/off times, app usage, playback telemetry (bitrate, buffer, stalls) • Voice control data: Audio recordings/commands (rate, channels, spoken audio) via TV or remote • App & service data: App install/uninstall, permissions, HbbTV interactions, casting/media sharing • Remote & accessory data: Battery level, button clicks, pairing status
Who is the data holder	VIDAA USA Inc. (USA) is the data holder for Service Data generated by the VIDAA Smart TV App and related services. For Product Data generated by the Smart TV and Smart Remote running VIDAA OS: VIDAA acts as the data holder (technical controller).
How the user can access the data, transfer it, delete it, etc.	Via the portal my.vidaa.com (after login): • View, download or delete account-related data • Self-service download of some non-personal Product/Service Data • For all other data: submit a request at https://www.vidaa.com/support/ → delivered via secure download in Apache Parquet format (log files ≈ 200 MB each) • Deletion: Factory Reset on TV or Smart Remote removes device-resident logs; clear cache in VIDAA Smart TV App; withdraw consent for optional features (e.g. Enhanced Viewing, HbbTV) directly in TV settings • Transfer/portability: Available via the same secure download request (no separate third-party transfer button mentioned)
Other important Data Act transparency points	• <u>Data stored on-device (temporary/cache) and/or in remote servers (logs/telemetry)</u> • <u>Many categories generated in real time</u> • <u>VIDAA does not share trade secrets; some data may also qualify as personal data (see Privacy Notice)</u> • <u>Security: industry-standard controls (details at https://www.vidaa.com/security/)</u> • <u>Retention: Product Data kept only as long as needed; logs archived after 2 years, temporary data deleted after 1 year</u> • <u>Free of charge; contact via support form</u>

4. Contact and Support

For any further assistance or to submit a formal request regarding data access, portability, or deletion, please contact:

Email: Sales@expressluck.hu

Access to the data generated by our Smart TVs is provided free of charge to users for a minimum period of 10 years from the date the product is placed on the market.

We will guide you through the process and respond within a reasonable timeframe.

This declaration is issued in fulfillment of our obligations under the EU Data Act. We remain at your disposal for any additional questions.

Name: Xiaoping Wang

Title: Senior Manager, Product Certification

Date: [April 2, 2026]

Signature: 王小平



Name: Jingzhao Hu

Title: Authorized Representative

Date: [April 2, 2026]

Signature: 胡景兆

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