



Generic Data Notice for Professional Systems and Services

Version 1.0, dated Aug 29, 2025

1. Introduction and applicability

This Generic Data Notice provides Users with generic information on data handling practices for Product Data and Related Services Data in relation to Signify's Connected Products and Related Services, respectively, that are part of a Professional System offered by Signify for use in the European Union. More specific information on such data handling practices may be provided in Specific Data Notices for such Connected Products and Related Services. If we process Personal Data, we will do so in accordance with our [Data Processing Agreement \(DPA\) and the applicable data processing schedule\(s\)](#) (DPS) or [Privacy Notice](#), as applicable to our role in that processing. In case of conflict between this Generic Data Notice or a Specific Data Notice and our DPA, the applicable DPS or our Privacy Notice, the DPA, DPS and Privacy Notice shall prevail.

Specific Data Notices for Connected Products or Related Services may deviate from this Generic Data Notice. In case of conflicts between the Generic Data Notice and a Specific Data Notice, the latter will prevail.

2. Definitions

Terms starting with a capital in this Generic Data Notice, will have the meaning as attributed thereto in this document.

Applicable Terms means the ToSS and/or the Sales Terms, as the context may require

Data means Product Data and/or Related Services Data unless indicated otherwise in this Generic Data Notice.

EU Data Act means the Regulation (EU) 2023/2854 of the European Parliament and of the Council of 13 December 2023 on harmonised rules on fair access to and use of data and amending Regulation (EU) 2017/2394 and Directive (EU) 2020/1828

Generic Data Notice means this document.

Professional System means a combination of Connected Products with or without other products, Related Services, other services and/or software, wherein such combination is intended to function together as a cohesive unit or integrated solution and is intended for professional use only.

Retention Period means the period in which Data will be retained by the applicable Data Holder as specified in paragraph 3 of this Generic Data Notice, or as the case may be, in the applicable Specific Data Notice.

Sales Terms the applicable [Terms and Conditions for Sale of Products and Services] as published here: <https://www.signify.com/global/conditions-of-commercial-sale>.

Signify means the Signify entity as indicated in Annex 2 to the ToSS.

Software Services and Subscription shall have the meaning as attributed thereto in the ToSS. For the purposes of this Generic Data Notice, however, Software Services refer only to the portion thereof that qualifies as a Related Service to the applicable Connected Product.



Specific Data Notice means, in relation to a Related Service the document as published by Signify, or the part of the Software Services Specification Sheet in respect of that Related Service, in which Signify provides certain information as required under article 3.3. of the EU Data Act on Product Data and/or Related Services Data in respect of that Related Service, and/or, as the context may require, in relation to a Connected Product, the document as published by Signify, or the part of the specification document in respect of that Connected Product, in which Signify provides certain information as required under article 3.2. of the EU Data Act on Product Data in respect of that Connected Product.

Toss means the Terms of Software Services as published here: <https://www.signify.com/toss>

The terms **Connected Product**, **Data Holder**, **Readily Available**, **Related Service**, **Product Data**, **Related Services Data** and **User** have the meaning as attributed thereto in the EU Data Act.

For specific types of Data Annex A to this Generic Data Notice includes specific definitions for such Data types.

3. Data Retention and Storage and Trade Secrets

- Retention Period: Data collected and if stored by Signify will be retained until the earlier date of 1) the end date of a period as indicated in the applicable Specific Data Notice from the date of collection by Signify and 2) 3 months, or such other period as indicated in the relevant Specific Data Notice, from the date on which the Subscription pursuant to which Signify is storing such Data ends.
- Storage arrangements: Data collected and if stored by Signify will be stored in accordance with the applicable Specific Data Notice.

4. Access to Product Data and Related Services Data

To the extent Product Data or Related Services Data would qualify as Readily Available Data, for access to such Data see paragraph 5 of this Generic Data Notice.

5. Access to Readily Available Data, categories, format and volume of such Data and technical means for access and quality of service for Readily Available Data ("Indirect Access")

- Requesting access: Users can request access to Readily Available Data of their Connected Products and Related Services for themselves or third parties via the contact details as referred to in paragraph 7 of this Generic Data Notice.
- Users can withdraw consent for Data access to third parties at any time via same contact as indicated above
- Nature, format and estimated volumes: See the relevant Specific Data Notice(s)
- Technical means for access: See the relevant Specific Data Notice(s).
- Quality of service: Access to Readily Available Data is provided subject to the terms and conditions in the ToSS related to non-conformity of Software Services.



6. Intended Use by Signify as Data Holder and third parties and trade secrets

- Use of Data by Signify: Signify and its subsidiaries are allowed to use Data for the purposes as set out in the Sales Terms for Connected Products and in the ToSS for Related Services.
- Use by Third Parties: Signify shall share Data with third parties only as set out in aforementioned terms and conditions.
- In case another party than the Signify entity indicated in paragraph 7 of this Generic Data Notice would be the Data Holder, the relevant Specific Data Notice(s) will indicate the intended use by such Data Holder and, if applicable, deviating arrangements from this paragraph 6.
- Unless specified differently in an applicable Specific Data Notice, neither Signify, nor the Data Holder, nor a third party holds trade secrets in Data accessible to the User.

7. Data Holder, communication and support, other data processing parties

Unless indicated otherwise in the applicable Specific Data Notice, Data Holder of Readily Available Data is Signify Netherlands B.V.

Users can contact Signify and the Data Holder for queries related to Readily Available Data via:

- Support Portal: <https://www.signify.com/global/contact>, “select your country”

Other data processing parties may be specified in the applicable Specific Data Notice.

8. Complaints and dispute resolution

Any disputes between Users and Signify or any of its affiliated companies shall be settled in accordance with the dispute settlement arrangement and in accordance with the applicable laws as set out in the Applicable Terms

9. Contract duration and termination in respect of User's access rights to Readily Available Data (Indirect Access)

- User's access rights pursuant to paragraph 5 hereof (Indirect Access) end at the end of the applicable Retention Period.
- Termination: Users may terminate their applicable Subscription in accordance with the ToSS by which they also terminate their right to access Data as of the end of the Retention Period.

10. Modifications to this Generic Data Notice

This Generic Data Notice may be changed by Signify from time to time. The current version of this notice will apply and can be found at: <https://www.signify.com/global/legal/digital-terms/data-notices>

Annex A to Generic Data Notice for Professional Systems and Services

“**Asset Data**” means Data about the Connected Product(s) to which the relevant Related Service relates, and their settings, such as luminaire/device types, MacID, device firmware version, power, customizable data fields, etc.

“**Camera Data**” means any Data collected by a camera.



“Location Data” means Data about the location of a person or an object.

“Operational Data” means Data about the operational use of the Connected Product(s) and/or Related Service, including e.g. metric Data like energy data, device failures, Connected Product and/or Related Service error messages and service availability.

“Personal Data” has the meaning as attributed thereto in the ToSS

“Security logs” means the collection of records containing certain user actions needed for security analysis of System access. These user actions encompass a collection of security related events that help Signify to detect malicious activities and help to prevent future security incidents. Security related events are all external events that potentially would compromise the confidentiality, integrity, or availability of the applicable Software Service.

“Sensor” means a device, module, machine, or subsystem that detects events or changes in its environment and sends the information to other electronics, frequently a computer processor

“Sensor Data” means any Data collected or generated by a Sensor.

“Technical logs” means the collection of Data containing the status of the events in the Connect Product or Related Service, such as updates of the settings thereof, excluding User IDs that may be included herein.

“Usage Data” means Data about how a user has accessed and used the deployed Connected Product(s) and/or Related Service(s), including e.g. access logs which may include the user’s id and IP address for security monitoring and control purposes.

“User Account Data” means Data regarding accounts for users (e.g., user’s first name, last name, email address, authorizations of users, password and user ID) made available by or on behalf of Signify to get access to and use of Software Services.