EU Data Notice Zigbee Products

Introduction
We are Innr Lighting B.V., IBRS 1232, 1200 WB, The Netherlands.
If you have any questions about this document or if you need support, feel free to reach out to our team via https://www.innr.com/service.

This document provides information regarding the *product data* generated and transmitted by Innr Zigbee products. We describe the type, format, and estimated volume of the data, when the data is generated and whether this is continuous and in real-time, where and how long the data is stored, how you as a user can access, retrieve, and erase the data, the Terms of Service and the quality of service of your access to the data.

Background
Innr Zigbee products are *connected products* as defined by the EU Data Act. They can be connected to a Zigbee network and can then communicate with other devices within that same Zigbee network. Zigbee networks are usually created by a so-called bridge (also called hub), and in some cases by Zigbee remote controls (including sensors). Hubs and remote controls are available from various manufacturers.

A Zigbee bridge functions as the so-called coordinator in the Zigbee network, the "boss" that regulates the network. In addition, it connects to your home's LAN (Local Area Network), i.e. your ethernet and Wi-Fi network at home. Through your LAN, it allows you to access, control, and monitor the Zigbee network and the devices in it, for example using an app on a smartphone.
In most cases, the bridge also allows you to connect the system to the Internet, giving you remote access to the Zigbee system from outside of your home, and additional functionality.

A Zigbee remote control either connects to the Zigbee network of a bridge, or it sets up "private" Zigbee network containing only the Zigbee devices that it controls, without connection to your home's LAN.

Scope of this Data Notice
Innr Zigbee products can only be accessed through the Zigbee protocol, they cannot be connected directly to your home's LAN or to the Internet. To use the functions of Innr Zigbee products, you must connect them to a bridge or remote control.

Innr does not provide a *related service* (cloud and/or app) as defined by the EU Data Act specifically for any Innr Zigbee product. Therefore, this Data Notice only provides information regarding the data generated and transmitted by means of Zigbee by the Innr Zigbee products themselves, i.e. the product data.

When you connect an Innr Zigbee product to a bridge, that bridge may collect, store, and process data about, and retrieved from, the Innr Zigbee product. The bridge may furthermore have related services connected to it that also collect, store, and process that data. The *Data Holder* of this *related service data* is usually the manufacturer of the bridge, but other parties than the bridge manufacturer may also provide related services and thus be a Data Holder. The Data Holders must provide you with all the information required by the EU Data Act about the related service data.

Innr also offers a bridge and related service connected to it. The related service consists of a cloud service and an app. Please refer to the "EU Data Notice Innr Bridge" provided with the Innr Bridge, for information about the data that is collected by the Innr Bridge and related service.

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When you connect an Innr Zigbee product to a Zigbee remote control (of any manufacturer) in a private Zigbee network without connection to your home's LAN, there is usually no related service. Innr Zigbee remote controls do not have a related service offered by Innr; they qualify as "Innr Zigbee products" and are covered by this Data Notice.

Product Data of Innr Zigbee Products

Product data is defined by the EU Data Act as "data generated by the use of a connected product that the manufacturer designed to be retrievable, via an electronic communications service, physical connection or on-device access, by a user, data holder or a third party, including, where relevant, the manufacturer".

The table below lists the type, format, estimated volume, moment of generation, retention period, and method of access of all product data of Innr Zigbee products.
The only way in which Innr Zigbee products allow to retrieve their product data is by means of the Zigbee protocol. This can be by means of Zigbee Touchlink (marked as "T" in the "Access Method" column in below table), network command ("N"), descriptor request ("D"), attribute read ("A"), attribute report ("R"), or cluster command ("C").

Data Element	Type	Format	(Estimated) Volume	Generated	Retention	Access Method
Node Descriptor, incl. Manufacturer code, Logical type (coordinator, router, or end device)	Zigbee descriptor response	Set of fields described in Zigbee specification; total 104 bits (13 bytes)	13 bytes	Upon Node Descriptor Request	Less than a second	D
Node Power Descriptor, incl. current power source (battery, mains)	Zigbee descriptor response	Set of fields described in Zigbee specification; total 16 bits (2 bytes)	2 bytes	Upon Node Power Descriptor Request	Less than a second	D
Simple Descriptor for a controllable element (light emitter, socket outlet, etc.), incl. Profile identifier and Device identifier that define type of device (e.g. dimmable light), and input and output clusters that define supported functions	Zigbee descriptor response	Set of fields described in Zigbee specification; total 64+16*(i+o) bits, i is amount of input clusters and o is amount of output clusters; maximum 512 bits (64 bytes)	26 bytes	Upon Simple Descriptor Request	Less than a second	D
Touchlink Scan Request (only for Innr remote controls), incl. whether the sender is factory new	Touchlink request	Set of fields described in Zigbee specification; total 2 bytes	2 bytes	Upon user initiated Touchlink action	Less than a second	T
Touchlink Scan Response, incl. similar info as in the Node and Simple Descriptors	Touchlink response	Set of fields described in Zigbee specification; total 36 bytes	36 bytes	Upon Touchlink Scan Request	Less than a second	T
Touchlink Device Information Response, incl. similar info as in the Node and Simple Descriptors	Touchlink response	Set of fields described in Zigbee specification; total 7+16*n bytes, n is amount of controllable elements	23 bytes	Upon Touchlink Device Information Request	Less than a second	T
Network parameters, incl. channel, network ID, neighbor table, routing tables	Network parameter	Integer number, list of addresses, list of routing costs	A few hundred bytes	At network start/join/ rejoin/update and routing	Until factory reset	N
Basic cluster attributes, incl. Model ID, Application Version, HW Version, SWBuildID	Attribute	Depending on attribute (integer, string, enumeration, etc.)	55 bytes	At attribute read	Less than a second	A
OTA cluster attributes, incl. Image Type ID	Attribute	Depending on attribute (integer, string, etc.)	40 bytes	At attribute read or cluster command	Less than a second	A C
Groups cluster group data, used to assign device to a group (home, room, zone)	Group data	List of integer numbers	32 bytes	When device is added to or removed from group	Until factory reset	C

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Data Element	Type	Format	(Estimated) Volume	Generated	Retention	Access Method
Scenes cluster scene data, used to make device participate in scenes	Scene data	List of scenes per group, with device's desired state for that scene; max 32 scenes for most devices	Depending on device type between 256 and 672 bytes	When a scene is added to or removed from device	Until factory reset	C
OnOff cluster attributes, incl. OnOff state and StartUpOnOff (used for power on behavior)	Attribute	Boolean (true or false, on or off), enumeration (on, off, last-state)	7 bytes	Continuously as device turns on/off, in real-time	Until state changes or factory reset	A R C
Level cluster attributes, incl. CurrentLevel state, OnOffTransitionTime (used for fading on/off), and StartUpCurrentLevel (used for power on behavior)	Attribute	Integer number	14 bytes	Continuously as device dims up or down, in real-time	Until state changes or factory reset	A R C
Color Control cluster attributes (only for Innr tunable white and color lights), incl. CurrentX/Y/ Hue/Saturation/ColorTemp state, color loop parameters, and StartUpColorTemperature (used for power on behavior), and primaries parameters (RGB info)	Attribute	Integer number, enumeration (Color Mode), bitmap (Color Capabilities)	14 bytes for tunable white lights, 47 bytes for color lights	Continuously as device changes color or color temperature, in real-time	Until state changes or factory reset	A R C
Electrical Measurement and Metering cluster attributes (only for power monitoring smart plugs), incl. V, mA, W, and kWh, and formatting info	Attribute	Integer number	37 bytes	Continuously while measuring, in real-time	Until factory reset (only last measured value, no history)	A R C
Binding table (only for Innr remote controls)	Network parameter	Group id and list of clusters	15 bytes	Upon user touchlinking another device with the remote control	Until factory reset	N
Device Configuration cluster data (proprietary Innr cluster, only for Innr remote controls), used for sending key events to interested devices	Key event (press/ release/ etc.), key ID (up/ down/ left/right/ OK/etc.)	Enumeration	4 bytes	Upon user pressing or releasing a key	Less than a second	R C

All above product data with a retention period other than "less than a second" is stored in the product's non-volatile memory (flash or EEPROM). This data is retained when the product is powered off and on again. Dynamic or transient data, such as the product's current state and a response to a request that contains various other data elements, is also temporarily stored in the product's RAM. Data in RAM is lost/erased when the product is powered off.

For all above product data, factory-resetting the product, i.e. deleting it from the Zigbee network or manually factory-resetting it according to its manual, erases the data and resets it to default values.
For the OnOff, Level, Color Control, Electrical Measurement, and Metering clusters, using the Basic cluster "Reset to Factory Defaults" command resets the attributes to their default values.

The Terms of Service applying to the products and to your access to and use of the product data can be found on our website here. Quality of service for access to the product data consists of the capabilities of the product to provide the data over a Zigbee network (which depend on your Zigbee network), and of the product's warranty, which can be found on our website here.

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