

Luda.Farm EU Data Act Notice – Flex 4G

This EU Data Act Notice (“Notice”) describes the data generated by the connected product Flex 4G and the User’s rights under the EU Data Act (Regulation (EU) 2023/2854) in relation to such data (“Data”).

Where Data is stored locally on the Product and not transmitted to Luda.Farm, Luda.Farm may not hold or receive that Data. In such cases, the User can access the Data directly via the Product’s local administration interface (router web UI).

Data Holder / Contact point: Luda.Farm AB (see Section 8 Contact).

Product: Flex 4G (Outdoor 4G LTE router/access point with PoE, IP66).

Related service(s): Connectivity via SIM/4G subscription (provided by a mobile network operator). The included pre-installed SIM card can be managed/activated through the Luda.Farm app. The SIM card may be replaced with another operator’s SIM; in such case the User enters into a separate agreement directly with that operator.

Flex 4G is administered locally via a web browser interface (router web UI) and is not controlled through the Luda.Farm app. Connected devices (e.g., cameras) may be managed through their respective applications/services.

1. Types, formats, estimated volume and collection frequency of Data

Types	Formats	Estimated Volume	Collection Frequency
Device status information (e.g., power/WAN/LAN/Wi-Fi/4G status, signal strength)	Text	Typically a few KB per day (depends on activity)	Continuous or event-driven while powered on
Operational/system logs (e.g., system events, errors, reboots)	Text	Up to approx. 19k characters stored on device (supplier stated capacity)	Recorded in real time while powered on; logging disabled by default
Network traffic metadata shown in UI (e.g., live list of connected clients)	Text	Typically low; live view only	Live while powered on; not retained after power off
Network traffic (data in transit/payload via router)	Various (depends on connected devices and services)	May range from MB to many GB per month (e.g., video streaming from cameras)	User-controlled (depends on usage)
Device settings information (e.g., SSID, Wi-Fi settings, APN, basic network settings)	Text	Only a few KB to MB in total per device	Collected/stored when set up or modified

Important clarification: Flex 4G's main role is to enable connectivity. Any "network traffic (payload)" is generated by the connected devices/services (e.g., cameras) and passes through the router to provide the connection.

2. Data storage options and duration of retention

2.1. Data storage options

For Flex 4G, Data storage is limited to local storage on the device required for configuration and (if enabled by firmware settings) local system logs. There is no Luda.Farm cloud storage for Flex 4G router data.

2.2. Duration of retention

Supplier information: Any locally stored system logs and live client information are not retained after power off. System logs are recorded in real time while the device is powered on, are disabled by default, and are stored up to approximately 19k characters. Export of logs is not supported.

3. User access, retrieve, share and erase

Direct access: The User can access relevant Data directly via the Product's local administration interface (router web UI), where available.

Request via Luda.Farm: The User may also contact Luda.Farm via the contacts listed in Section 8. Luda.Farm can provide guidance on how to access Data and, where applicable, help facilitate the User's EU Data Act requests.

Sharing with third parties: Where applicable and technically feasible, the User may request that Data is made available to a third party chosen by the User under the EU Data Act. For Flex 4G, much of the Data is stored locally on the device; therefore, sharing is typically performed by the User via the router web UI.

Erasure for the Product typically means clearing configuration and any locally stored logs by power cycling (where applicable) or performing a factory reset through the router web UI.

For personal Data (as defined under General Data Protection Regulation (Regulation (EU) 2016/679)), please refer to our Privacy Policy.

Certain Data may contain trade secrets. Where relevant, Luda.Farm will protect trade secrets whilst continuing to fulfill its obligations under the EU Data Act.

4. Purposes

Flex 4G processes Data primarily to provide network connectivity for connected equipment and to enable basic operation and troubleshooting of the Product (e.g., configuration and optional system logs).

5. Share with third parties

Mobile network operator: Flex 4G provides connectivity via a mobile network operator when using a SIM/subscription. The mobile network operator may process data necessary to provide the connectivity service.

Supplier information: Flex 4G does not support cloud reporting/telemetry by the device supplier.

Supplier information: Flex 4G does not support storing target addresses or domain names (e.g., URL logging/DPI storage).

Luda.Farm does not receive Flex 4G router data in any cloud service. If the User contacts support, the User may choose to share relevant information (e.g., screenshots of settings or logs) for troubleshooting.

6. Right to lodge a complaint

Users shall have the right to lodge a complaint with the relevant competent authority designated under Article 37 of the EU Data Act, in the Member State of their habitual residence, place of work or establishment.

7. Contract term and termination

Any related service provided by Luda.Farm in connection with Flex 4G (e.g., SIM management/activation through the Luda.Farm app) shall commence when the User first activates or uses the relevant service and shall be effective until the User or Luda.Farm terminates the service. Use of a third-party mobile operator subscription is governed by the User's contract with that operator.

8. Contact

Users may exercise their rights under the EU Data Act by contacting Luda.Farm AB via the following methods: by using the information on our "Contact Us" page, by sending an e-mail to support@luda.farm, call us +46 31 31 30 290 or by submitting a support case via <https://support.luda.farm>.

Firmware updates: Supplier information indicates that firmware updates are performed manually by downloading updates from the official website (or via supplier-provided customized firmware).