

1 DATA ACT COMPLIANCE STATEMENT (EXTERNAL)

Last edited: 27-05-2026

1.1 General Compliance statement

For those DALI A/S products that qualify as connected products or related services under the EU Data Act (Regulation (EU) 2023/2854), this statement describes the general compliance approach.

Product specific statements are provided where applicable.

Products that fall within the scope of the EU Data Act are designed and assessed in accordance with the applicable requirements of Regulation (EU) 2023/2854. Where such products qualify as radio equipment, the applicable cybersecurity requirements of the Radio Equipment Directive (RED), as implemented through EN 18031, are also applied.

Only the products explicitly listed in this document fall within the definition of connected products or related services.

1.2 Data Generated by the Products

Where applicable, data generated by a product is described per product and classified in accordance with the EU Data Act definitions, including:

- Product data.
- Related service data.
- Metadata.

Products that generate data are designed, where applicable, technically feasible, and proportionate, with data access by design, enabling users to access data generated during normal operation in accordance with Articles 3–5 of the EU Data Act, taking into account the nature of the product and the data generated.

Technical documentation supports correct data classification, interoperability, and compliance with applicable data access and security requirements.

1.3 Data Sharing Disclosure

Data generated through the use of a connected product may be shared with third parties only upon explicit request by the user, in accordance with Article 5 of the EU Data Act.

Where DALI acts as a data holder, any such data sharing is conducted in compliance with Article 6, including requirements relating to:

- Security.
- Contractual safeguards.
- Controlled third party access.

Where applicable, data sharing with third parties is conducted under fair, reasonable and non-discriminatory (FRAND) conditions in accordance with Article 6 of the EU Data Act.

DALI products are not intended for use cases that would normally trigger business-to-government (B2G) data sharing obligations under Articles 14–22 of the EU Data Act. Accordingly, DALI is not subject to routine B2G data disclosure obligations. Data would only be disclosed to public authorities where legally required in situations of exceptional need.

1.4 User Data Access Rights

Where applicable, users of connected products may, upon request, access readily available data generated by the product and, where relevant, instruct the data holder to share such data with a third party of their choice, in accordance with Articles 4 and 5 of the EU Data Act.

User data access and data sharing are provided in accordance with the requirements of the EU Data Act, taking into account technical feasibility, proportionality, security considerations, and the nature of the data concerned. Data is made available without undue delay and free of charge, in structured, commonly used, and machine-readable formats, and is protected by appropriate technical and organisational security measures.

This section does not establish any additional data access or sharing obligations beyond those mandated by the EU Data Act

1.5 Cybersecurity and Data Protection (RED / EN 18031)

For radio equipment in scope of the Radio Equipment Directive, DALI applies cybersecurity measures consistent with EN 18031, including:

- Protection against unauthorized access to data and device functions.
- Secure authentication and access control mechanisms.
- Integrity protection of software and firmware.
- Secure communication over wireless interfaces (e.g. Bluetooth, Wi-Fi).
- Secure update mechanisms and vulnerability management processes.
- Safeguards against misuse that could compromise network resources or user data.

Where personal data is processed, appropriate protections are applied to prevent unauthorised disclosure, manipulation, or loss.

1.6 Products in Scope of the EU Data Act

Products in scope:

- DALI VEGA.

Products with wireless technology not in scope:

- Headphones; IO-8, IO-12, and other models in this series,
- KATCH G2, and other models in this series,
- Phantom AMP DSP, including all models in this series.

These products, although equipped with Bluetooth or Wi-Fi, function solely as passive audio receivers. They do not collect, generate, or transmit user-related, usage, performance, or environmental data, nor do they rely on a related digital service. The primary function of these products is audio reproduction, not the generation, collection, or transmission of data within the meaning of the EU Data Act.

Accordingly, they do not meet the definition of a connected product under Articles 2(5) and 3(1) of the EU Data Act.

1.7 Product specific statement-DALI VEGA

Data Generated

DALI VEGA generates the following categories of data during operation:

- Device operational data (power status, volume level, equalizer settings).
- Connectivity data (Bluetooth pairing status, Wi-Fi connection status, signal strength).
- Streaming service interaction data (playback commands, track metadata, service selection).
- Diagnostic and performance data (error logs, firmware status, device health metrics).

No personal content such as audio recordings, voice data, or user-intentionally stored media is collected or transmitted by the device.

User Data Access

Users may access device generated data via the BluOS application supplied by Lenbrook Industries Limited (<https://www.bluos.io/bluos-app>).

Data is made available in a structured, commonly used, and machine-readable format.

Users may request export of device generated data through the BluOS application.

- Downloadable logs via “Settings > Help & Support > Request Data”
- App-based options to Backup & Restore BluOS Playlists (Settings > Manage Playlists)

Data Security and Protection

Appropriate technical and organisational measures are implemented, including:

- Protection against unauthorised access.
- Secure wireless communication.
- Encryption of data exchanged with cloud services where applicable.
- Secure firmware update mechanisms.
- Credential based access control for network and streaming services.

Identity of the Data Holder

For data access requests or Data Act compliance inquiries:

- Product data holder:
DALI A/S, E-mail: safety@dali-speakers.com, Address: DALI Allé 1, DK 9610 Nørager, Denmark
- Related service (BluOS) data holder:
Lenbrook Industries Limited, Address: 633 Granite Court, Pickering, Ontario, Canada, L1W 3K1

DALI does not control or process BluOS related service data and is not the data holder for such data within the meaning of the EU Data Act.