EU Data Act – Supplier Statement on Data Access and Compliance

This supplier statement is issued under the sole responsibility of the manufacturer:

GUDE Systems GmbH
Von-der-Wettern-Str. 23
51149 Köln (Deutschland)

www.gude-systems.com

Product series:	Expert Power Control Expert Transfer Switch Expert Net Control Expert Sensor Box Expert PDU Energy
Description:	The listed products are network-connected devices designed for electrical measurement, monitoring and remote control. They provide real-time information on electrical parameters and connected sensors and include an embedded web server and standard communication interfaces (MQTT, Modbus/TCP, SNMP, Syslog, HTTPS). According to Article 2(5) of Regulation (EU) 2023/2854, these devices qualify as connected products. The data they generate qualifies as product data and related service data within the meaning of Article 3.
Types of Data Generated	The devices generate the following categories of data: • Product usage data: current, voltage, frequency, active/reactive power, switching states, digital input states, environmental sensor data. • Related service data: device status, alarms, event logs, operational parameters. • Manufacturer system data (not subject to mandatory sharing): diagnostics, firmware version, internal system logs, security-relevant configuration data.
Data Access for Users (Article 3–4)	Users can access their product and service data through the following interfaces: • Embedded HTTPS web interface (JSON export) • MQTT publishing • Modbus/TCP registers • SNMP OIDs Data is provided in structured, commonly used, machine-readable formats. Users may request access to their data or may designate a third party to receive the data via these interfaces, in accordance with Article 5..
Third-Party Access (Article 5–6)	Upon instruction by the user, the manufacturer will provide access to the user's product data to authorized third parties, using the existing interfaces and without undue delay. Access is limited to data falling under the user's right to data, as defined in Article 3.
Data Security and Access Control (Article 32)	Security measures include: • HTTPS/TLS encrypted communication • User authentication and access roles • Secure credentials for MQTT, Modbus/TCP and SNMPv3 (where applicable) • Factory reset function for deletion of user configuration data These measures ensure integrity, confidentiality and traceability of data access.
Transparency and Documentation	The manufacturer provides: • Communication protocol and API documentation • Instructions for user data export • Applicable terms of use and data policy This information is made available before purchase or installation, as required by Article 3(2).
Contractual Compliance (Article 13–14)	The manufacturer confirms that its contractual terms do not contain unfair restrictions on: • user access to data • sharing of data with authorized third parties reuse of data, where applicable

Based on the above measures, the manufacturer affirms that the listed products are designed to comply with the obligations applicable to connected products under:
Regulation (EU) 2023/2854 (Data Act).

Date of Issue ((YYYY-MM-DD):	2025-09-12
Place:	Cologne
Name:	Dr. Michael Gude
Position:	General manager, CEO
Signature:	