Roborock – EU Data Act Notification

Effective Data: 1 February 2026

1. **General Introduction**

In accordance with Regulation (EU) 2023/2854 (hereinafter referred to as the "Data Act"), we provide the following pre-contractual information regarding the product data and related service data generated by this connected product.

The data collected by Robotic Mowers may vary depending on the version and model. For specific information, you can refer to the product user manual and service agreement. In general, the product data and related service data processed by Robotic Mower products are as follows. Actual data generated depends on the specific use of the product.

We keep our document under regular review and may update this document to reflect changes to our data practices. If we make material changes to our document, we will publish the changes on the related Roborock websites so that you are aware of the data we collect and how we use it. We encourage you to periodically check this page for the latest information on our privacy practices.

2. **Product Data**

Connected Product means a device that obtains, generates or collects data (hereinafter referred to as "Product Data") concerning its use or environment, and that is able to communicate Product Data via an electronic communications service, physical connection or on-device access.

Data Category	Data Format	Estimated Data Size (estimates only; actual data size may vary according to product use)	Real-time or Not	Data Storage	Data Retention
Basic device information (e.g., Bluetooth information, battery level)	.csv	< 5Mb/day	YES		
Component number (e.g., MCU version number)	.csv	< 5Mb/day	YES		Automatically

Data Category	Data Format	Data Size	Real-time or Not	Data Storage	Data Retention
Operating data (e.g., machine restart count, RTK start count)	.csv	< 10Mb/day	YES	Stored locally before being uploaded to the cloud.	deleted after 3 months or when the account is cancelled
User configuration (e.g., mowing parameters, mowing preference settings)	.json	< 100Mb/day	NO		
Navigation data (e.g., mowing trajectory, obstacle information)	Encrypted binary	300Mb	NO		
OTA data (e.g., upgrade history, upgrade error messages)	.json	< 1Mb/month	NO		

3.   **Related Service Data**

The Roborock App is a Related Service as defined in the Data Act, and generates data on user behaviours and events related to the connected products (hereinafter referred to as "Service Data"). You can use the Roborock app to add and control your robotic mower, and make the device interact with other smart home devices. If you use such digital services, the following related Service Data may be generated.

Data Category	Data Format	Data Size (estimates only; actual data size may vary according to product use)	Real-time or Not	Data Storage	Data Retention
Account information					
Login log					
OAuth login records					

Third-party registered user	Cloud database/ json	100KB	NO	Cloud server	Until the purpose of use is achieved or the account is cancelled
Third-party user login/unbind log					
Activity participation status					
Event coupon					
Activity notices					
App message switch configuration					
Mobile push messages					
User privacy/function consent records					
User feedback					
User equipment					
Device pre-configuration commands					
Device sharing relationships					
Share historical users					
Device scheduled tasks					
MQTT authentication					

information					
OTA upgrade log					
NPS survey status					
Push messages					
Device IoT status					
Network configuration information (uid, wi-fi ssid, wi-fi password, time-zone, region)					

4. **Delivery, Access and Removal**

In accordance with the Data Act, you have the right to access the data generated by your connected device, to receive it in a commonly used machine-readable format, and to share it with a third party of your choice. You may exercise these rights using the Roborock app or by contacting us at privacy@roborock-eu.com.

In addition, you can directly remove certain data in the Roborock app and you can also delete your account to clear all data stored in the cloud. For data that is stored locally on your device, you can remove it be restoring the device to factory settings. For data that cannot be removed using the app or through a factory reset, you can send a request to privacy@roborock-eu.com.

Please note that after the related personal information is removed by you or with our assistance, we may be unable to immediately delete it from our backup systems due to the requirements of the applicable law and technical constraints. However, we will securely store your information and isolate it from further processing until the backups are cleared or anonymised.

5. **Legal and Security**

5.1. Sharing with third parties

In general, we will not share your data with any third party. Roborock will ask for user consent if there is any need to invite third parties to provide services for users.

In accordance with the Data Act, users may request the data holder to share data with a third party. To facilitate this, please direct the related third parties to the page for further instructions regarding Product Data access.

5.2. Terms and termination

For details regarding the contractual terms and termination, please refer to the applicable service agreement.

In general, the contract for providing related services will be valid until users terminate the services or withdraw their consent for data processing. The general way for terminating the contract is to delete the account or withdraw consent through the Roborock app.

5.3. Information on trade secrets

In accordance with the Data Act, we are committed to protecting our trade secrets and confidential business information. Please note that under the Data Act, we are not obligated to share data that includes such trade secrets or confidential business information if disclosure would compromise our legitimate business interests. When data access is provided, strict confidentiality measures are applied to prevent unauthorised use or disclosure of sensitive information.

5.4. Users' right to lodge a complaint

If you believe that your rights under the EU Data Act have been violated, you reserve the right to lodge a complaint with a competent authority in your jurisdiction.

At the time of publication of this document, EU Member States are still working on designating the authorities to handle complaints relating to the Data Act. We will keep you updated of any progress.

5.5. Virtual assistant

You may use third-party virtual assistant services (such as Google Assistant). Typically, you will be required to log in to your third-party account and accept user terms or privacy policies. If you use these services, your devices may generate corresponding related Service Data. According to the Data Act, these third parties are the holders of such data. Please contact them for information and requests regarding such data.

6. **Data Holder Information**

If you have any feedback or questions about this document or if you have any concerns regarding Roborock's handling of your data, please contact us using the information provided below and indicate that your inquiry or comment is related to this document:

• Data Holder: Beijing Roborock Technology Co., Ltd.

• Address: Room 1001, Floor 10, Building 3, Yard 17, Anju Road, Changping District, Beijing, P.R. China

• Email Address: privacy@roborock-eu.com

7. **Applicable Product Models**

According to Data Act, the following Roborock Robotic Mower may be classified as connected products

Category	Number	Product Model
Robotic Mower	1	RockNeo Q105
	2	RockNeo Q110
	3	RockNeo Q110H
	4	RockMow S108
	5	RockMow S115
	6	RockMow Z115
	7	RockMow Z130
	8	RockMow Z150
	9	RockMow Z120 Lidar
	10	RockMow X115H
	11	RockMow X130H
	12	RockMow X120H Lidar