

EU Data Act Information Notice

Information on Pantum Connected Products and Related Services

V.2.0

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Statement

This document is intended to fulfill the data transparency obligations under the EU Data Act, and specify the details of data processing involved in the operation of Pantum connected products and Related Services.

As a manufacturer of connected products and a provider of related services for the EU market, Pantum is obliged to safeguard the specific rights of users who purchase Pantum products in the EU under the EU Data Act (2023/2854).

A connected product means an item that can obtain, generate or collect 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, and whose primary function is not the storing, processing or transmission of data on behalf of any party other than the user.

Product data means data obtained, generated or collected by a connected product and which relates to its performance, use or environment. Purely descriptive data that accompanies the connected product (e.g. in user manuals or on the packaging) is not product data.

Related Service means a digital service, other than an electronic communications service, including software, which is connected with the product at the time of the purchase, rent or lease in such a way that its absence would prevent the connected product from performing one or more of its functions, or which is subsequently connected to the product by the manufacturer or a third party to add to, update or adapt the functions of the connected product.

Related Service Data means data representing the digitisation of user actions or of events related to the connected product, recorded intentionally by the user or generated as a by-product of the user's action during the provision of a related service by the provider.

The content of this document is subject to amendment in line with product updates.

Chapter 1 Connected Products

1.1 What types of data can connected products generate?

Data category	Data type
Device attributes	Firmware version
	Software version
	Machine model
	Consumables information
	Unique device identifier
Device status	Printing status
	Error information
	Paper tray status
	Consumable consumption volume
Device usage data	System settings
	Printer settings
	User login history
	Print/copy/scan job count information
Device Logs (where applicable)	Device upgrade log
	Device job log
	Device error log
	Device consumables log

***Note:** The data listed in this table is not generated by all connected products. The types of data generated vary depending on the specific model of the connected product; please refer to the actual specifications of each individual product.*

1.2 What are the formats and estimated data volume generated by connected products?

- Data format

Data stored locally on connected products is in binary format. When users access or retrieve the data, it is converted by the connected product into plain text format for direct readability.

- Estimated data volume

The data volume generated per operation is typically between 60 bytes and 1024 bytes. Dynamic operational data (such as Print/copy/scan job count information and device logs) will increase progressively with device usage time and frequency.

- Data generated when the connected product is in standby or powered off

No data is generated when the connected product is in standby or powered off.

1.3 Can connected products generate data in real time and on a continuous basis?

Data category	Is the data generated in real time and continuously?	Details
Device attributes	No	These are the inherent static attributes of a product, which are fixed configuration and identification information determined during the manufacturing phase. Their content is independent of the product's operating status and user behavior, and is not dynamically updated during device use.
Device status	Yes	It reflects the real-time operating status of a device and is continuously generated and updated only when the device is in operation or active. No new status data is generated when the device is shut down or idle.
Device usage data	No	It records user operations and job processes on a device and is generated based on real-time user activities, and new records are only created when the device performs specific tasks or related events occur. No such data is continuously generated while the device is idle.
Device Logs (where applicable)	Yes	Records system events and historical traces during operation, maintenance, and exceptions. Triggered and generated in real time upon specific system events or actions; no new data is generated if no relevant events occur or when the device is idle/powered off.

Chapter 2 Storage of and Access to Data Related to Connected Products

2.1 Where is the data of connected products stored?

Data category	Storage location
Printing status	Real-time information, not stored.
Error information	Real-time information, not stored.
Paper tray status	Real-time information, not stored.
Consumables consumption volume	Real-time information, not stored.
System settings	Local device
Printer settings	Local device
User login history	Local device

Software version	Local device
Print/copy/scan job count information	Local device
Device upgrade log (where applicable)	Local device
Device job log (where applicable)	Local device
Device error log (where applicable)	Local device
Device consumable log (where applicable)	Local device
Consumable information	Local device/remote server
Machine model	Local device/remote server
Firmware version	Local device/remote server
Unique device identifier	Local device/remote server

Note: The data types specified as storable on remote servers in the above table apply only to certain connected device models.

2.2 How long is the data from connected products stored? How can data from connected products be deleted?

- Remote server: There is no fixed storage period for product data uploaded to remote servers. The storage duration is determined by multiple factors, including data type, data volume, and applicable laws and compliance requirements.
- Local device: Users can actively delete system settings, printer settings, user login history, and similar data by manually modifying settings or performing a factory reset. Other than these data types, baseline local data necessary to ensure normal product operation and service provision cannot be deleted and will remain stored locally until the physical decommissioning and disposal of the device.

2.3 How can users obtain the data of connected products?

Data related to connected products may be obtained through the following methods:

- Acquisition of real-time information: Real-time information is displayed in pop-ups on the device's physical control panel and the computer connected to the device.
- Acquisition via the official Pantum App: Users may query device attribute-related information through official Pantum App.
- Acquisition via the "Print Information Page" function on the local device's control panel: The device's physical control panel includes a built-in "Print Information Page" option. Users may independently enable this function via the control panel to print and present product-related data in the form of a physical information page. This is a local operation; data is output locally on the product without transmission over the network.
- Acquisition via the device's built-in Embedded Web Server (EWS): Users may access the dedicated EWS webpage by entering the corresponding IP address of the connected product in a browser on a computer within the same network. Through this interface, users can directly view the stored data of the connected product, and perform operations such as network configuration, password change, and advanced function settings, while synchronously obtaining relevant configuration data.

- Acquisition Via the Printer Driver Installed on Host PC: When initiating a print job or performing a status query, the printer driver installed on the host PC requests specific data from the connected product, and the device responds by transmitting the requested data.
- Device Maintenance Mode: Certain device log data (where applicable) can only be accessed under authorized device maintenance mode and requires authorization from the user for Pantum customer support engineers to assist in retrieval.

Note: The scope of queryable data varies across the different access methods described above.

Chapter 2 Related Services

Part I: General Information

1.1 Who is the related service provider and prospective data holder?

Service Provider / Prospective Data Holder: Zhuhai Pantum Electronics Co., Ltd.

Address: Building 02, Building 06, Building 08, No. 888 Shengping Avenue, Pingsha Town, Jinwan District, Zhuhai, Guangdong, P.R. China

1.2 What data does Pantum expect to obtain and store?

The specific product data expected to be obtained, related service data generated, format, frequency, estimated volume, storage location, and retention periods for each related service are detailed in Part II of Chapter 2.

1.3 How can users access, retrieve, or delete data?

Users may access, retrieve, or delete data through the methods specified in Part II of Chapter 2.

Where data resides solely within local environments controlled by the user or their organization, Pantum does not hold any remotely exportable copy. Users should primarily utilize the local interfaces or administrative tools of the respective service, and may contact Pantum for reasonable operational guidance. Deletion operations may be subject to limitations under applicable laws, system security considerations, and mandatory data retention obligations.

1.4 How can users request data sharing with third parties or terminate sharing?

Users may directly provide data downloaded or exported by themselves to a lawfully selected third party, and agree upon the purpose, duration, and security requirements with such third party. Terminating data sharing does not automatically delete copies already lawfully received by a third party; subsequent processing of such copies is governed by the agreement between the user and the third party as well as applicable laws. For data stored exclusively within the user's local environment, Pantum cannot perform direct transmission or terminate local sharing on behalf of the user.

1.5 How are trade secrets handled if contained within the data?

If any accessible data is identified and designated as a trade secret of Pantum, the trade secret holder is in principle Zhuhai Pantum Electronics Co., Ltd. Prior to sharing, Pantum may agree with the user or the data recipient on confidentiality measures proportionate to the risk, such as non-disclosure agreements, access controls, restricted transfer protocols, and prohibitions on further disclosure. Pantum will withhold, suspend, or refuse the sharing of specific trade secret data only under the conditions and procedures permitted by the Data Act.

2.6 How is the contract duration of related services determined? How is it terminated?

The contract duration and termination methods depend on the specific related service and the applicable terms of service, as detailed in Part II of Chapter 2. Uninstalling software, canceling user accounts, terminating service contracts, disabling optional data collection features, or deleting local data may produce different legal and operational effects.

Part II Specific Information on Related Services

2.1 PANTUM Mobile Application (APP)

2.1.1 Data Overview

Data Category	Data Type	Format	Frequency & Estimated Volume	Storage Location & Retention Period
Product Data	Device connectivity and operational status, including LAN online status, consumables remaining level, Unique Device Identifier, firmware version, device model, and current device operational status	JSON	Generated when user launches the APP, visits specific interfaces, or manually refreshes requests. Single request volume: ~a few KB to tens of KB	Stored on user's mobile device. Retained until user unbinds device, clears APP local cache, or uninstalls the APP
Related Service Data - Print	Digital records of printing operations, including job settings, file attributes (name, source, size), and job dispatch success/failure status	Binary	Generated when user initiates a print job. Single operation volume: ~a few KB	Stored on user's mobile device. Retained until user unbinds device, clears APP local cache, or uninstalls the APP
Related Service Data - Scan	Digital records of scanning operations, including scan settings, generated file attributes (type, size), and scan success status	Binary	Generated when user initiates a scan job. Single operation volume: ~a few KB	Stored on user's mobile device. Retained until user unbinds device, clears APP local cache, or uninstalls the APP

Related Service Data - Network Configuration	Network setup and provisioning data, including network configuration parameters, device Bluetooth identifier, provisioning interaction parameters, and provisioning process status	JSON / Text	Generated based on user network configuration actions. Single operation volume: ~a few KB	Stored on user's mobile device. Retained until user unbinds device, clears APP local cache, or uninstalls the APP
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2.1.2 Data Access, Retrieval, and Deletion

- **Related Service Data - Print / Scan:** Access & Retrieval: Open APP -> [Me] -> [History] -> Print History / Scan History; Deletion: Navigate to [Me] -> [History] -> [Manage] -> Delete.
- **Related Service Data - Network Configuration:** Access & Retrieval: Real-time display of currently configured network parameters and connection status on the APP Network Settings page.
- **Product Data:** Access & Retrieval: Viewable on pages displaying printer details, such as Home and Device Details pages.

In addition to the specific paths above, users can delete all of the aforementioned data by unbinding the device, clearing the APP local cache in their mobile operating system settings, or uninstalling the APP directly.

2.1.3 Contract Duration and Termination of Related Services

The service contract is for an indefinite duration, commencing upon installation of the APP and acceptance of the terms of service. Users may terminate the service at any time by canceling their account or uninstalling the APP.

2.2 Pantum Intelligent Printer Management System (PiPME)

2.2.1 Data Overview

Data Category	Data Type	Format	Frequency & Estimated Volume	Storage Location & Retention Period
Product Data - Print Volume	Cumulative print volume metrics, retrieved by data collectors and transmitted to the service center	Binary / JSON	Collection frequency configured by the user; ~20 KB per device per collection	Stored in local service center database controlled by user/organization; retained until service termination or database initialization by admin

Product Data - Status	Printer operational status or fault/error information, retrieved by data collectors and transmitted to the service center	Binary / JSON	Collection frequency configured by the user; ~5 KB per device per collection	Stored in local service center database controlled by user/organization; retained until service termination or database initialization by admin
Product Data - Consumables	Printer consumables status information, retrieved by data collectors and transmitted to the service center	Binary / JSON	Collection frequency configured by the user; ~10 KB per device per collection	Stored in local service center database controlled by user/organization; retained until service termination or database initialization by admin
Related Service Data	Data collector details, monitored printer inventory list	Binary / JSON	Collector info generated per user settings; monitored list generated/updated upon user actions; ~1 KB per device	Stored in local service center database controlled by user/organization; retained until service termination or database initialization by admin

2.2.2 Data Access, Retrieval, and Deletion

Users can view product data and related service data stored in the local database via the administrator console, and can delete local database records using the database initialization function within the administrator console.

2.2.3 Contract Duration and Termination of Related Services

The service contract is for an indefinite duration, commencing upon installation of PiPME and acceptance of the terms of service. Users may terminate the service in accordance with the terms of service or by uninstalling the PiPME application.

2.3 Pantum Utilities (UT)

2.3.1 Data Overview

Data Category	Data Type	Format	Frequency & Estimated Volume	Storage Location & Retention Period
Related Service Data	Job configuration data, interaction records, and feature usage data	JSON / Binary	Collected once every 24 hours only upon explicit user consent/authorization; ~1 KB per collection	User local storage until actively cleared or software uninstalled; Remote server in fully anonymized form, retained for a reasonable period permitted by law

2.3.2 Data Access, Retrieval, and Deletion

Users can view data through relevant interfaces within UT, and can delete local data by uninstalling UT.

During installation of UT, users may independently choose whether to authorize data collection by Pantum remote servers. Data uploaded to Pantum remote servers is fully anonymized and cannot be linked to specific users or device identification data; therefore, individual retrieval or targeted deletion of uploaded data is technically not supported. Pantum will store and protect such data within the scope of legitimate business purposes.

2.3.3 Contract Duration and Termination of Related Services

This service contract is for an indefinite duration, commencing upon installation of UT and acceptance of the terms of service. Users may terminate the service by uninstalling UT.

2.4 Pantum Firmware Update Assistant (Assistant)

2.4.1 Data Overview

Data Category	Data Type	Format	Frequency & Estimated Volume	Storage Location & Retention Period
Product Data	Printer model, Unique Device Identifier, and current firmware version used to identify the device and check for updates	JSON / Text	Obtained when the user searches for printers, checks for updates, or performs a firmware upgrade; ~2 KB per operation	Retained locally on user's device until Assistant is uninstalled or service terminated; Transmitted to Pantum remote server for version verification and immediately deleted once checking is complete

2.4.2 Data Access, Retrieval, and Deletion

Users can view the printer model, Unique Device Identifier, current firmware version, and update check results within the Assistant interface. Local data can be deleted by uninstalling the Assistant. As the remote server does not retain any of this data, no remote copy exists for access, retrieval, or deletion.

2.4.3 Contract Duration and Termination of Related Services

The service contract continues from the moment the user installs Assistant and accepts the terms of service until terminated by the user in accordance with the terms or upon uninstallation of Assistant.

Chapter 3 Miscellaneous

If users wish to exercise their rights under the EU Data Act, they may contact Pantum via the following email address: EU_Data_Act@pantum.com

To ensure prompt identity verification and efficient handling of your request, please provide the following necessary information in your email:

- The connected product model and Unique Device Identifier;

- The name of the relevant application or related service involved (where applicable);

- A detailed description of your specific rights request and supporting documentation (where applicable).

The complete legal terms governing connected products, related services, and data processing can be accessed via the following link: http://eu.pantum.com/basic/EU_Data_Act_Compliance/

The General Data Protection Regulation (GDPR) focuses on the protection of personal information and differs in content from the EU Data Act. For inquiries concerning personal information, users may contact Pantum via the following email address: privacy.eu@pantum.com.

Users have the right to lodge a complaint concerning alleged infringements of Chapter II of the Data Act with the competent supervisory authority designated by the relevant EU Member State pursuant to Article 37 of the Data Act.