

EU Data Act Compliance Statement

Brainboxes Limited - EU Data Act Compliance Overview

Last Updated: 8 October 2025

Introduction to EU Data Act

The EU Data Act (Regulation (EU) 2023/2854) entered into force on 11 January 2024, with key provisions becoming applicable from 12 September 2025. This regulation establishes harmonised rules on fair access to and use of data generated by connected products and related services within the European Union.

Brainboxes' Commitment

Brainboxes Limited is committed to full compliance with the EU Data Act and transparency regarding data practices across our product range.

Our Product Range and Data Practices

Current Product Portfolio

Brainboxes manufactures and supplies a range of industrial connectivity solutions, including:

- Industrial Ethernet switches (unmanaged)
- Serial-to-Ethernet device servers
- Industrial I/O modules
- Industrial gateways and controllers
- USB and PCI connectivity products

Data Storage and Communication

Important Notice: Brainboxes products, including our managed Ethernet switch range, are designed and manufactured with the following data characteristics:

1. **No Data Storage:** Our products do not store machine data, usage data, environmental data, or personal data beyond what is strictly necessary for basic operational functionality (such as configuration settings required for device operation).

Tel: +44(0)151 220 2500

Enquiries: sales@brainboxes.com

Accounts: accountsdl@brainboxes.com

The exporter of the products covered by this document declares that, except where otherwise clearly indicated, these products are of GB preferential origin.
Place: Liverpool Date: As per invoice. Please note: None of Brainboxes' products require an Export Licence.



2. **No External Communication:** Our products do not communicate with Brainboxes IT infrastructure, cloud services, or external servers for data collection, analytics, or telemetry purposes. The only communication to external Brainboxes IT infrastructure is to retrieve the latest firmware and driver images. This process is by default manual and requires the user to initiate, we do not log personally identifiable information when devices access Brainboxes IT infrastructure.
3. **Local Operation:** All product functionality operates locally on the customer's network infrastructure. Any data generated during operation remains within the customer's control and infrastructure.
4. **Configuration Data Only:** Where products require configuration (such as the BB-400), this information is stored locally on the device and can be accessed, modified, or erased by the user at any time through standard management interfaces.

EU Data Act Obligations

Information Obligation (Article 3)

As Brainboxes products do not generate, collect, or transmit data to external parties beyond basic operational requirements, the following applies:

- **Type of Data Generated:** Configuration data only (IP addresses, VLAN settings, port configurations, etc., as applicable to specific products)
- **Data Format:** Standard industry formats accessible via WebUI, CLI, or SNMP
- **Data Volume:** Minimal - limited to configuration parameters
- **Continuous Data Generation:** No
- **Data Storage:** Local device storage only
- **Remote Server Storage:** None
- **Data Access:** Full access via standard management interfaces (WebUI, SSH, SNMP, as applicable)
- **Data Retention:** Indefinite until manually erased by user or device reset
- **Data Deletion:** Users can erase configuration data at any time via factory reset or through management interfaces

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Data Sharing Obligations (Articles 4 & 5)

As Brainboxes does not act as a data holder for machine-generated or usage data:

- We do not collect data that would require sharing under the Data Act
- Users maintain complete control over any data present on or passing through our devices
- No third-party data sharing arrangements exist
- No data is transmitted to Brainboxes or any third parties

User Rights

Customers using Brainboxes products have:

- Complete control over device configuration
- Full access to all configuration data stored on devices
- The ability to export configuration data in standard formats
- The right to erase all configuration data
- No restrictions on data portability

Product-Specific Information

Unmanaged Ethernet Switches

Our managed Ethernet switch range operates entirely within the customer's network infrastructure:

- **No Cloud Dependencies:** Full functionality without external connectivity
- **No Telemetry:** No usage statistics or performance data transmitted externally
- **Network Traffic:** Devices switch network traffic but do not inspect, store, or transmit packet contents to external parties

Industrial Controllers and Gateways

Industrial controllers and gateways manufactured by Brainboxes:

- Process data locally according to user programming
- Do not transmit operational data to Brainboxes infrastructure
- Provide user access to all configuration and operational parameters
- Support standard industrial protocols for local data access

I/O Modules and Serial Devices

Our I/O modules and serial connectivity products:

- Function as transparent data conduits
- Do not store or transmit usage data externally
- Operate entirely under user control
- Provide configuration access via standard interfaces

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Technical Protection Measures

Brainboxes implements appropriate technical measures to:

- Prevent unauthorised access to device configuration
- Support secure management protocols (HTTPS, SSH, SNMPv3 where applicable)
- Enable user-controlled access management
- Protect configuration data integrity

Updates and Changes

This statement applies to all Brainboxes products currently available and placed on the market as of 8 October 2025. We will update this statement when:

- New products with different data characteristics are introduced
- Significant changes to existing product functionality occur
- Regulatory requirements change
- Additional clarification is required

Updates will be clearly dated and previous versions archived for reference.

Contact Information

For questions regarding EU Data Act compliance or data practices related to Brainboxes products:

Brainboxes Limited

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Liverpool L24 8RL

United Kingdom

Email: support@brainboxes.com

Website: www.brainboxes.com

Telephone: +44 (0)151 220 2500

Legal Representative (EU)

For EU Data Act matters, Brainboxes' operations in EU member states should be directed to our UK headquarters, which maintains compliance oversight for all products placed on the EU market.

Additional Resources

- Full EU Data Act text: [EUR-Lex](#)
- Brainboxes Technical Documentation: Available at www.brainboxes.com/support
- Product Datasheets: Containing detailed specifications for all products

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Declaration

Brainboxes Limited confirms that the information provided in this statement is accurate as of the date stated above and reflects our genuine commitment to transparency and compliance with the EU Data Act.

This statement will be reviewed and updated as necessary to ensure continued accuracy and compliance.

Version: 1.0

Effective Date: 08 October 2025

Next Review Date: 12 September 2026

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