

Data Act Notice ("Notice")

Last updated: November 17, 2025

This Notice and the rights described in it apply only to users in the European Union.

1. Who we are?

Buehler and its affiliate ITW Test & Measurement GmbH (hereinafter referred to as 'we' or 'us') are the manufacturers of sample preparation & analysis solutions.

Our address is:

ITW Test & Measurement GmbH
Meisenweg 35
0771 Leinfelden-Echterdingen
Germany
email: info.eu@buehler.com web: www.buehler.com/uk/

What is the purpose of this Notice?

Under the European Union's Data Act (the "**EU Data Act**") users of connected products, and of services related to connected products, have rights to certain data generated through the use of those products. This notice applies to those of our machines which are "connected products" within the definition of the EU Data Act ("**Products**"). The data in relation to which users have rights under the EU Data Act are described below in section 3 and is referred to as **Product Data**.

Many of our Products have built-in memory for data storage (**Machines with memory**). This is utilized for tracking performance data (saved programs, error messages, counters, etc.) of the Product. This data is stored locally on the machine and accessible via the User Interface or downloading to a USB drive.

Some of our Products require an external computer and Buehler software (**PC-Operated Software & Machines**) to operate the machine. These systems contain Product Data such as configuration files, programs, database of results, error messages, etc. This data is stored on the computer hard drive as default but can be configured to utilize an internal network or database if configured by the user.

2. Data Holder

The **Data-Holder** of the Product Data is:

ITW Test & Measurement GmbH
Meisenweg 35
0771 Leinfelden-Echterdingen
Germany
email: info.eu@buehler.com web: www.buehler.com/uk/

If you wish to exercise your rights under the EU Data Act or have any questions or concerns, please contact us at the above address or by email.

3. More about user rights under the EU Data Act

If you are in the European Union and buy, rent or lease a Product ("**EU Users**") you may have rights under the EU Data Act to access, retrieve and request the sharing of Product Data.

This Notice explains in more detail those rights and how EU Users can exercise them. It also provides information about the Product Data.

EU Users of our products have the right to ask us for access to Data. EU Users can also request for that data to be shared with a third party.

In some cases, exceptions to the rights in the EU Data Act may apply. For example, where the Product Data would reveal trade secrets or security information and could (if disclosed) cause serious harm.

The data protection rights of individuals are not affected by the EU Data Act. The rights under the EU Data Act described in this notice are in addition to EU data protection rights. Information about our processing of personal data and the data protection rights of data subjects can be found at www.buehler.com/uk/data-privacy-notice-gdpr/

4. What data types do user rights apply to?

The EU Data Act grants EU Users the right to access the following types of data:

- readily available **raw data** generated by use of a product;
- **metadata** to help make the raw data understandable and usable

together considered the "**Product Data**". The Product Data includes: performance data (saved programs, error messages, counters, database of results, etc.) of the Product and system configuration files.

For **Machines with memory**, this Product Data can be formatted in a proprietary binary format, SQL databases, XML and raw text. The estimated size of data can range from 300 bytes up to 32GB depending on the specific machine and amount of usage. The data is generated in real time. It is retained until memory is full at which point it will begin overwriting the oldest data to continue collecting new data.

For **PC-Operated Software & Machines**, this Product Data can be formatted in .xml, .jpg, .png, SQL databases, .txt., .dll, Excel, Word, and PDF formats. The size of data depends on the volume of testing completed. It starts from ~600MB and can reach several GB's of data. The data is generated in real time. It is retained until memory on the computer is full then the user must decide how to proceed (delete old results, archive database, etc.).

EU Users have no right under the Data Act to data calculated or enriched by us as the manufacturer.

EU Users are entitled lastly to Metadata to help make the raw data understandable and usable. This Metadata is provided on request from the Data-Holder in section 1.

5. Our use of data

We may use the Product Data that we hold for various purposes including providing maintenance services in relation to the Products, product improvement or creation, research and development, and generating reports and analytics in relation to the Products or otherwise.

6. How to obtain access to the Product Data

Machines with Memory:

In the case of Machines with Memory, the Product Data is stored within the memory in the Product and can be retrieved directly from there using a USB stick via the USB port provided. More information can be found in the corresponding manual for the Product. The metadata can be obtained from the relevant manufacturer (as set out in section 1 above) on request. The user is able to erase some of the Product Data (error logs, saved programs) from the user interface.

PC-Operated Software & Machines:

In the case of PC-Operated Software & Machines , the Product Data is stored within the memory of the Product and can be retrieved through the computer hard drive. More information can be found in the corresponding manual for the Product. The metadata can be obtained from the relevant manufacturer (as set out in section 1 above) on request. The user is able to erase Product Data through the software program (program, test results, test reports) or through the computer's folder structure (configuration files, log files).

Restrictions on use

You may not use the Product Data obtained pursuant to rights under the EU Data Act to develop a product that competes with the appliance, nor share the data with a third party with that intent. Further, you may not use any Product Data to derive insights about our economic situation, assets and production methods.

Product Data will be provided in a structured, commonly used, and machine-readable format.

7. Request to share of Product Data with a third party

EU Users can request that we share the Product Data with third parties (known as "**data recipients**"). We are only obliged to comply with that request if the data recipient is located in the European Union. If, following such a request, the EU User no longer wishes to share Product Data with third parties, they can request the termination of data sharing.

For Machines with Memory, the Data Holder's obligations are fulfilled by the EU User giving the third party access to their device or the EU User itself sharing the data they obtain via a USB stick.

For PC-Operated Software & Machines , the Data Holder's obligations are fulfilled by the EU User giving the third party access to their device or the EU User itself sharing the data obtained from the computer hard drive.

8. Making a complaint to a competent authority

EU Users have the right to complain to the competent authority about our compliance with the obligations under the EU Data Act. For more information, please contact the competent authority in your country.

9. Updates to this Notice

We may update this Notice from time to time in response to changing legal, regulatory, technical or business developments. When we update our Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

You can see when this Notice was last updated by checking the "last updated" date displayed at the top of this Notice.