

my-PV GmbH

EU Data Act

Product and Service Information

Version 1.1 — 19 December 2025

1. Introduction and Scope

This document provides information about the data generated by my-PV connected products and the associated cloud service my-PV Live (live.my-pv.com), in accordance with the EU Data Act (Regulation (EU) 2023/2854), Articles 3(2) and 3(3).

It applies to all my-PV connected products placed on the European Union market and the my-PV Live online platform.

Key regulatory dates:

- 11 January 2024 — EU Data Act entered into force.
- 12 September 2025 — Pre-contractual information obligations (Art. 3(2)/(3)) and data access-at-request obligations (Art. 4–5) apply. This document fulfils these requirements.
- 12 September 2026 — Access-by-design obligation (Art. 3(1)) applies to products placed on the market from this date onwards.

2. Data Holder Identity and Contact

Legal entity	my-PV GmbH
Address	Betriebsstraße 12, 4523 Neuzeug, Austria
Country	Austria (EU)
Contact (Data Act inquiries)	info@my-pv.com
Website	https://www.my-pv.com
Cloud platform	https://live.my-pv.com

3. Connected Products Overview

The following connected product families are covered by this document:

Product	Type	Description
AC THOR / AC THOR 9s	Power Manager	Photovoltaic power manager for surplus energy usage (heating, hot water, heat pump control). 3 kW / 9 kW variants.
AC ELWA 2	Electric Water Heater	PV-powered electric water heater with integrated power electronics. Up to 3.5 kW.
HEA·THOR IoT	Electric Water Heater	IoT-connected heating element. 3.5 kW and 9 kW variants.
WiFi Meter	Power Measurement	Wireless power meter for monitoring PV production and grid consumption.

All products connect to the my-PV Live cloud platform via WiFi or LAN and the my-PV Device Communication Server (DCS).

4. Product Data: Type, Format, and Volume

The following describes the data generated by my-PV connected products (Art. 3(2)(a)).

4.1 Device Operational Data

Data Category	Fields / Examples	Applicable Products
Power measurements	Power Values (W), Current Values (A), Voltage Values (V)	All products
Temperature	Up to 4 temperature sensors (°C), power stage temperature	AC THOR, AC ELWA 2, HEA·THOR IoT
Energy counters	Energy values (Wh/kWh)	All products
Status & modes	Operating mode, control mode, cloud state, online status, relay states	All products
Error codes	Device error/warning codes	All products
Battery data	State of charge (%), battery voltage	AC THOR, AC ELWA 2
Grid measurements	Voltage (V), current (A), power (W), frequency (Hz)	All products

4.2 Device Configuration Data

Data Category	Examples
Operating settings	Main operating mode, target temperatures, boost settings, control parameters
Network settings	WiFi SSID, cloud mode (on/off), cloud server address
Firmware information	Current firmware version, controller version, serial number
Feature settings	Debug mode, dynamic tariff optimization, solar forecast, notification rules

4.3 Data Format

- Operational data: JSON (structured, machine-readable)
- Chart / export data: JSON time-series (aggregated at 15-min, hourly, daily, monthly, yearly intervals)
- Configuration data: JSON key-value pairs

4.4 Estimated Data Volume

Product	Transmission Interval	Approx. Daily Volume
AC THOR / AC THOR 9s	~10 seconds	~2–5 MB
AC ELWA 2	~10 seconds	~1–3 MB
AC ELWA-E	~10 seconds	~1–2 MB
HEA·THOR IoT	~10 seconds	~1–3 MB
WiFi Meter	~10 seconds	~1–2 MB

5. Real-Time Data Generation

All Cloud Mode Activated my-PV products generate data continuously and transmit it in near real-time (Art. 3(2)(b)):

- Devices report operational data approximately every 10 seconds to the my-PV Device Communication Server (DCS).
- The my-PV Live platform displays current device data with minimal delay.
- Historical data is available at 15-minute, daily, monthly, and yearly aggregation levels.

6. Data Storage and Retention

Information on where and how long data is stored (Art. 3(2)(c)):

6.1 Storage Locations

Storage	Location	Data Type
Device (on-device)	On the physical product	Current operational state, configuration registers (volatile — overwritten continuously)
Time Series DB	Azure West Europe (EU)	Time-series device data, analytics, solar forecasts, tariff data
MySQL Database	EU-hosted server	User accounts, device registrations, system configurations, notification rules
Redis Cache	EU-hosted server	Temporary operational state (device SOC, optimizer states, access permissions)

6.2 Retention Periods

Data Category	Retention Period
Device operational data (time-series)	Retained for the lifetime of the user account
Device configuration / setup	Current configuration plus setup history
User account data	Retained until account deletion; then anonymized (see Section 10)
Analytics / monitoring data	Aggregated, non-personal; retained for product improvement
Redis cached data	Temporary (minutes to hours); auto-expiring

7. Data Access, Retrieval, and Erasure

How users can access, retrieve, or delete their data (Art. 3(2)(d)):

7.1 Access Methods

Method	Description
my-PV Live Web Platform	Access at live.my-pv.com — real-time dashboard, historical charts (day/week/month/year/full), device setup and configuration.
my-PV Live Mobile (PWA)	Progressive Web App providing the same functionality on mobile devices.
Cloud Control API	Per-device API token (controlKey) for programmatic read/write access to device data and settings.
Data Export	Chart data can be exported in the Cloud.

7.2 Data Erasure

Users can delete their account via the my-PV Live platform (Settings > Delete Account). Upon deletion:

- Personal data (name, email, address, phone) is cryptographically anonymized.
- The anonymized record is retained only for technical integrity; it cannot be traced back to the user.

For targeted data erasure requests, contact info@my-pv.com.

8. Data Usage by my-PV

How my-PV uses product and service data (Art. 3(3)(c)):

Purpose	Description
Device functionality	Transmitting settings, displaying live operational data, enabling remote monitoring and control.

Product improvement	Aggregated and anonymized analysis of device performance to improve firmware and products.
Diagnostics & support	Authorized support staff may access device data to assist with technical issues (with user consent).
Optimization services	Solar forecast, dynamic tariff optimization, and smart price optimization features.
Platform analytics	Anonymized usage statistics (active users, feature usage, performance metrics) for platform improvement.
Notifications	Rule-based email notifications configured by the user (e.g., temperature alerts, error alerts).

9. Third-Party Services

The following third-party services process data in connection with the my-PV Live platform:

Service	Provider	Data Shared	Purpose
Cloud Database	InfluxDB Cloud (Azure West Europe)	Device time-series data	Time-series data storage and querying
Email Delivery	Microsoft Office 365 (SMTP)	Recipient email, message content	Transactional emails (registration, password reset, notifications)
Authentication	Google OAuth (OpenID Connect)	Email, name (user-initiated)	Optional social login
Bot Protection	Google reCAPTCHA v2	Browser interaction data	Preventing automated abuse at registration/login
Business Search	Google Places API	Search text input	Installer/business lookup (optional user feature)
CRM	my-PV CRM system	Name, email, address, phone, company, newsletter preference	Customer relationship management (at registration)

my-PV does not sell user data or device data to third parties.

10. Right to Share Data with Third Parties

Pursuant to Article 5 of the EU Data Act, users have the right to request that their product data be shared with a third party of their choice.

- To request data sharing with a third party, contact info@my-pv.com with the subject "Data Act — Third-Party Data Sharing Request".
- Please include: your registered email address, the device serial number(s), and the identity and contact details of the third party.
- Data will be provided in JSON format, free of charge, without undue delay.
- To terminate third-party data sharing, send a request to the same address.

Note: Pursuant to Art. 5(2), designated third parties that qualify as gatekeepers under the Digital Markets Act (Regulation (EU) 2022/1925) are excluded as eligible data recipients.

11. Trade Secrets

Certain device data, in particular internal firmware parameters, proprietary control algorithms, and internal diagnostic registers, may constitute trade secrets of my-PV GmbH (Art. 3(3)(h)).

Where trade secret protection applies, my-PV may agree on proportionate technical and organizational measures with the data recipient to preserve confidentiality, in accordance with Art. 4(6)–(9) of the Data Act.

12. User Rights and Complaints

Users of my-PV connected products have the following rights under Chapter II of the EU Data Act:

- Right to access product data and related service data (Art. 4)
- Right to share data with third parties (Art. 5)
- Right to fair, non-discriminatory, and transparent contractual terms (Art. 7)

Complaint mechanisms:

- Contact my-PV directly at info@my-pv.com for any data access concerns.
- Users may lodge a complaint with the competent national authority. In Austria, the relevant authority is the Austrian Federal Ministry for Digital and Economic Affairs (BMDW).
- Dispute settlement bodies certified under Art. 10 of the Data Act may also be engaged.

13. Service Duration and Termination

The my-PV Live cloud platform is currently provided free of charge of registered my-PV devices (Art. 3(3)(i)).

- Users may terminate their account at any time via the platform (Settings > Delete Account).
- Upon termination, personal data is anonymized as described in Section 7.2.
- Users may request a full export of their data before account deletion.

14. Data Access Request

To exercise your rights under the EU Data Act, please send a request to:

my-PV GmbH

Betriebsstraße 12, 4523 Neuzeug, Austria

Email: info@my-pv.com

Subject: "EU Data Act — Data Access Request"

Please include:

- Your registered email address
- Device serial number(s) concerned
- Description of your request (data access, data transfer to third party, or data erasure)

my-PV will process your request without undue delay and free of charge.

15. Document Version

Version	Date	Changes
1.1	19 December 2025	Initial publication (Art. 3(2)/(3) application date)

This document may be updated to reflect changes in products, services, or applicable law. Users will be notified of material changes via the my-PV Live platform.