



Danfoss A/S

6430 Nordborg
Denmark
CVR nr.: 20 16 57 15

Telephone: +45 7488 2222
Fax: +45 7449 0949

Manufacturer's Statement of Compliance with the EU Data Act
Danfoss A/S

Danfoss Climate Solutions Segment/HydronicS Division/PL34

declares under our sole responsibility that the

Product category: Smart Heating

Type designation(s): Danfoss Icon2™ MC Basic and Advanced

Covered by this declaration is in conformity with the EU Data Act (EU) 2023/2854, provided that the product is used in accordance with our instructions.

The Danfoss Icon2™ MC is designed to operate offline or in connection with the Danfoss Ally™ Cloud service and Ally™ App – Descriptions in this document covers both setups. By activating and using this product together with or without Danfoss cloud services, the user consents to the applicable data handling terms.

a. Data Generated by the Controller

- The Icon2™ MC Basic and Advanced controllers continuously measure, calculate, and update operational parameters relevant to control the temperatures in the heating system.
- During normal operation of the Icon2 MC, internal log of system activities, measurements and calculated values are stored. When the limited memory of this log system is full, the oldest data will be erased.
- All data communicated via the Zigbee 3.0 certified interface reflects the current live operational state of the Icon2™ MC.
- If the Icon2™ MC is connected to Ally™ Cloud:
 - will all operational data from the Icon2™ MC be synchronized with Ally™ Cloud.
 - then please be aware of that Ally™ Cloud has a log of all received data. Data is stored for 6 months and then deleted.

Date: 2025.09.12 Place of issue: Kolding, Denmark	Issued by Signature: 79D5BC7397764ED... Name: Christian Botved Poulsen Title: Product Manager	Signed by: Christian Botved Poulsen	Date: 2025.09.12 Place of issue: Kolding, Denmark	Approved by Signature: 0629769193E24E7... Name: Christina Kjar Anderson Title: Senior Director, LoB Room Controls	DocuSigned by: Christina Kjar Anderson
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- If a user requests all data to be deleted, Danfoss will ensure that all data in Ally™ Cloud are made anonymous, without any option of linking the data to any specific installation or persons.

b. Data added by user

- Data added by users is not handled as Personal Data by this product and thus not extra protected compared to configuration data. Due to this, it is highly recommended not to use any data which can be seen as Personal Data. This can be the full address of the installation, names or other kinds of information which can point directly at specific people or locations.

c. What data are used for

- Live data sent between products in a system with the Icon2™ MC is used for the cooperation of products like Icon2™ MC, Icon2™ RT and Icon2™ RT Zigbee. Which makes it possible to control the heating system.
- If connected to Ally™ Cloud, live data will be sent between the Icon2™ MC and Danfoss Ally™ Cloud will be used for the cooperation with products like the Icon2™ MC, Danfoss Cloud and Ally™ App. This makes it possible to control the heating system with the Ally™ App.
- The data stored in the internal log of the Icon2™ MC and in the Ally™ Cloud log can be used for:
 - **Operational Efficiency:** Data collected to optimize the performance and maintenance of devices, such as usage statistics and error logs.
 - **User Experience Enhancement:** Information gathered to improve user interaction and satisfaction, such as preference settings and feedback.
 - **Product Development:** Information utilized for developing and enhancing product features and functionalities, such as user behavior analytics.
 - **Research and Innovation:** Information collected for research purposes and innovation, contributing to new product designs and technologies.
 - **Technical Support:** Information collected to assist in troubleshooting and providing technical support to users, ensuring smooth operation of the service.

Please be aware, Danfoss will only be able to get access to the log data in the Icon2™ MC if the user reads out the log file with the Danfoss Icon2™ App and shares it with Danfoss specifically for one or more of the above purposes.

d. Data Access

- All operational data is available in real time via the ZigBee 3.0 interface.
- The complete ZigBee 3.0 API specification including parameter names, units, scaling factors, and descriptions, are publicly available at Danfoss Icon2™ support.
- Access to and use of the ZigBee interface and data is open to the product owner or any third party they authorize without requiring Danfoss intervention.
- If the Icon2™ MC is connected to Ally™ Cloud:
 - Operational data will be available in real time via the Danfoss Ally™ API.
 - The complete Danfoss Ally™ API specification, including parameter names, units, scaling factors, and descriptions, is publicly available in a machine-readable format.
 - If access to the data stored for 6 months at the Ally™ Cloud is wanted, the procedure for getting access to the data can be found at [Danfoss Ally™ Support page](#)

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- Access to and use of the Danfoss Ally™ API is open to the product owner or any third party they authorize without requiring Danfoss intervention.
- If access to the log data in the Icon2™ MC in a machine-readable format is wanted, the procedure for getting access to the log data can be found at [Danfoss Icon2™ support](#).

e. Third-Party Access

- Users may connect their own compatible devices, loggers, gateways and software to access live data on the ZigBee 3.0 interface or Danfoss Ally™ API.
- Granting such access to third parties is permitted by Danfoss and does not void the product warranty.

f. Optional Danfoss Cloud Services

- Connection to any relevant Danfoss cloud service is optional but control of the Icon2™ Heating system using the Danfoss Ally™ App is only possible if the Icon2™ MC is connected to the Ally™ Cloud.

g. Data Formats and Interoperability

- Live data is accessible using the ZigBee 3.0 interface or if connected to Ally™ Cloud using the Danfoss Ally™ API.
- Documentation for the ZigBee 3.0 API specification is available at [Danfoss Icon2™ support](#)
- Documentation for Danfoss Ally™ API is available at [Danfoss Developer Portal](#).

h. Fair, Reasonable, and Non-Discriminatory (FRAND) Terms

- Data generated by the Danfoss Icon2™ MC is made directly available to the end user in a machine-readable format without restrictions. Since Danfoss does not retain or control data on the Zigbee 3.0 interface, Danfoss is not to be considered data holder, and FRAND provisions under the Data Act are out of scope for the Zigbee interface
- Danfoss is considered as a data holder for the Icon2™ MC log as Danfoss needs to convert the data in the log to machine readable data which will be done free of charge.
- If connected to Ally™ Cloud:
 - Data generated by the Danfoss Icon2™ MC shared with the Danfoss Ally™ Cloud is made directly available to the end user in a machine-readable format via the Danfoss Ally™ API.
 - In Ally™ Cloud there is a copy of data for a limited period (currently up to 6 months), therefore Danfoss is considered as a data holder under the EU Data Act.
 - In accordance with the Data Act, Danfoss will provide access to this data to third parties authorized by the user on fair, reasonable, and non-discriminatory (FRAND) terms.

i. Contact to Danfoss

- In case you need further information or clarification, you can contact Danfoss here at www.danfoss.com/en/contact-us/

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Note to customer:

- This statement covers the compliance of the Danfoss Icon2™ MC used offline and if it's connected to Ally™ Cloud also the cooperation with Ally™ Cloud and the Ally™ App towards the EU Data Act regarding measured, stored, processed and live operational data.

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