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**Manufacturer’s Declaration of Compliance with Regulation (EU)
2023/2854 (Data Act)**

Danfoss A/S

Danfoss Climate Solutions/HydronicS Division/PL08 Controls & Meters

declares under our sole responsibility that the

Product category: Electronic weather compensated temperature controller.

Type designation(s): ECL Comfort 210, ECL Comfort 296, ECL Comfort 310 and the ECL Tool

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

By purchasing the ECL Comfort 210, ECL Comfort 296 or the ECL Comfort 310 applicable for the ECL Tool, you acknowledge and agree that Danfoss will collect, access, and process data generated by the use of the ECL Comfort 210, ECL Comfort 296, ECL Comfort 310 and the ECL Tool in accordance with the Data Act and the contractual arrangements agreed between the parties. Data will be processed in compliance with applicable legal obligations.

a. Data generated by the ECL Comfort 210, ECL Comfort 296 and ECL Comfort 310

The controller configured via an ECL application key continuously measures, calculates, and updates operational data like sensor values, setpoints, alarms etc. relevant to heating/cooling/ventilation installation in control.

- Internal logging is performed - the device stores historical data (sensor values) locally for 10 days.
- All data available from the controller reflects the current live operational state.

<p>Date: 2025.11.04 Place of issue: Nordborg</p>	<p>Issued by <small>Signed by:</small> Bjarne Stræde Signature: <small>2870494B67184E6...</small> Name: Bjarne Stræde Title: Product Manager</p>	<p>Date: 2025.11.04 Place of issue: Nordborg</p>	<p>Approved by <small>DocuSigned by:</small> Martin Møller Steffensen Signature: <small>F79C2C3C25AB4C3...</small> Name: Martin Møller Steffensen Title: Director, RD&E DEN</p>
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**b. Data access**

All operational and configuration parameters as well as historical data are available in real time through the:

- ECL Tool which is a point to point USB interface enabling access to the data. (see: [ECL tool | Danfoss](#))
- Modbus interface where the data is open to the product owner or any third party simply access without requiring Danfoss intervention. (see documents: [ECL Comfort 310 Danfoss Global Product Store](#))

c. Third-party access and data portability

For the ECL Comfort 296 and ECL Comfort 310 the product owners can connect any Modbus-compatible device, logger, or software to access live/logged/stored data without Danfoss intervention.

d. Optional Cloud Services

The ECL Comfort 296 and ECL Comfort 310 controllers are additionally applicable for the cloud based monitoring system, Leanheat[®] Monitor, where a separate compliance statement is made available.

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

Access to data generated by the ECL Comfort 210, ECL Comfort 296 and ECL Comfort 310 is provided without discriminatory restrictions and without additional licensing fees beyond the purchase of the product.

Note to the Customer

This statement covers the compliance of the ECL Comfort 210, ECL Comfort 296 and ECL Comfort 310 hardware and the service pc-tool, ECL Tool, with the EU Data Act regarding live/logged/stored operational data.

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