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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 120, ECL Comfort 220 and the ECL Go App

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 120, ECL Comfort 220 and the ECL Go App, you acknowledge and agree that Danfoss will collect, access, and process data generated by the use of the ECL Comfort 120, ECL Comfort 220 and the ECL Go App 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 120, ECL Comfort 220 and the ECL Go App

The controller continuously measures, calculates, and updates operational parameters relevant to heating installation in control.

- No internal logging is performed - the device does not store historical data locally.
- All data available from the controller reflects the current live operational state.
- The ECL Comfort 220 has a Mbus (meter bus) interface for meter applications.
- The ECL Go app connected to the ECL120/220 via a low energy Bluetooth connection is purely applicable for setting up parameters and not generating data.

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

All operational and configuration parameters are available in real time through the Modbus interface.

- Access to Modbus data is open to the product owner or any third party they authorize without requiring Danfoss intervention. (see documents: [ECL Comfort 120 Danfoss Global Product Store](#))

c. Third-party access and data portability

Product owners can connect any Modbus-compatible device, logger, or software to access live data without Danfoss intervention.

d. Optional Cloud Services

The ECL Comfort 120 and ECL Comfort 220 controllers are applicable with the cloud based monitoring system, Leanheat[®] Monitor, for which a separate compliance statement is made available.

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

Access to data generated by the ECL Comfort 120 and ECL Comfort 220 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 120 and ECL Comfort 220 hardware and the ECL Go app with the EU Data Act regarding live operational data.

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