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## GLOBAL E-WASTE & ENVIRONMENTAL LIABILITY POLICY

**Document Reference:** WAW-WEEE-ENV-2026-ULTIMATE

**Effective Date:** May 22, 2026

**Regulatory Scope:** WEEE Directive, RoHS, Battery Directive

**Official Contact:** admin@wawlyn.com

### 1. BINDING WEEE DIRECTIVE (2012/19/EU) COMPLIANCE

1.1. Framework Scope: This document constitutes WAWLYN's legally binding framework regarding the end-of-life handling, recycling, and disposal of electronic equipment. All products sold by WAWLYN, including the Wyn Pad, Worbix, Wryny, Wypods, and smart rings, fall under the scope of the Waste Electrical and Electronic Equipment (WEEE) Directive.

1.2. The Crossed-Out Wheeled Bin Symbol: This legally mandated symbol, printed on all WAWLYN packaging, manuals, and devices, indicates that WAWLYN hardware must NEVER be disposed of with municipal solid waste. Improper disposal violates local, national, and international environmental laws and subjects the user to potential municipal fines and legal action.

### 2. USER OBLIGATIONS, INDEMNIFICATION, AND STRICT DATA DESTRUCTION

2.1. USER INDEMNIFICATION REGARDING DATA ABANDONMENT: By returning a device to WAWLYN, participating in a mail-in recycling program, or depositing the device at a designated third-party WEEE collection facility, the User assumes absolute and total responsibility for the destruction of personal data.

2.2. Mandatory Wiping: YOU MUST PERFORM A COMPLETE CRYPTOGRAPHIC FACTORY RESET ON YOUR DEVICE PRIOR TO RELINQUISHMENT. For devices like the Wyn Pad or Worbix, this ensures the encryption keys are destroyed, rendering any residual data permanently unreadable.

2.3. Limitation of Liability: WAWLYN, our recycling partners, and our infrastructure providers (Supabase/Vercel) explicitly disclaim any and all liability for data breaches, identity theft, or unauthorized access resulting from a User's failure to wipe their hardware prior to recycling. By surrendering the device, you waive all rights to sue WAWLYN for any subsequent data leakage.

### 3. HAZARDOUS MATERIAL HANDLING (ROHS & BATTERIES)

3.1. Battery Chemistry: WAWLYN products contain high-energy-density Lithium-Ion and Lithium-Polymer cells. Under the EU Battery Directive (2006/66/EC), users are strictly prohibited from attempting to puncture, incinerate, crush, or forcibly remove batteries from sealed WAWLYN devices (e.g., Smart Rings, Wyn Pad).

3.2. STRICT LIABILITY WARNING: Any attempt to dismantle sealed units containing lithium batteries poses an immediate risk of thermal runaway, fire, explosion, and toxic gas emission.

3.3. Indemnification for Misuse: WAWLYN shall not be held liable for property damage, personal injury, or loss of life resulting from unauthorized disassembly, modification, or improper disposal of our hardware by the end-user or unauthorized repair technicians.

3.4. RoHS Compliance: WAWLYN certifies that all products comply with the RoHS 3 Directive, ensuring that levels of Lead, Mercury, Cadmium, Hexavalent chromium, PBB, PBDE, DEHP, BBP, DBP, and DIBP are well below legal thresholds.

#### **4. PRODUCER TAKE-BACK MECHANISMS**

4.1. 1-to-1 Scheme: WAWLYN facilitates legal compliance by offering a '1-to-1' take-back system. Upon the purchase of a new WAWLYN product, the user has the right to return an equivalent end-of-life device to us free of charge for proper ecological recycling.

4.2. Logistics and Transport: To initiate a legally compliant return, users must contact [admin@wawlyn.com](mailto:admin@wawlyn.com) to receive an authorized UN3481 compliant shipping manifest for lithium-battery transport. Devices shipped without this manifest may be rejected or confiscated by customs and shipping authorities.

