

EUWarranty.eu – Market Positioning & Legal Compliance Strategy

Directive (EU) 2019/771 – Legal & Commercial Guarantee Framework

1. Executive Summary

EUWarranty.eu is a pan-European digital guarantee infrastructure designed to facilitate, register, and verify commercial guarantees issued by third parties such as sellers, manufacturers, and brands. The platform ensures compliance with Directive (EU) 2019/771 and GDPR, acting as a trusted intermediary between consumers and guarantee issuers.

2. Legal Framework

Under Directive (EU) 2019/771, the seller is legally responsible for the conformity of goods with the contract, providing a mandatory two-year legal guarantee. Manufacturers and brands may voluntarily issue a commercial guarantee under Article 17. EUWarranty.eu facilitates such guarantees as a neutral registration and verification service but does not itself become a guarantor.

Key legal principles:

- Legal Guarantee (Seller's Liability): Articles 10–13 – mandatory, minimum 2 years.
- Commercial Guarantee (Voluntary Promise): Article 17 – binding when offered.
- Data protection: GDPR (EU Regulation 2016/679) – EUWarranty.eu acts as a data processor on behalf of issuers.

3. Business Model & Market Positioning

EUWarranty.eu provides three service tiers for integration by sellers and manufacturers:

- Free Tier – basic registration and QR verification.
- Business Tier – API integration, white-label cards, analytics.
- Enterprise Tier – batch issuance, extended warranty automation, compliance support.

Consumers benefit from a unified digital guarantee card and a simple QR-based verification system, while issuers gain regulatory compliance and customer trust.

4. QR Code Guarantee Ecosystem

Each guarantee is associated with a unique QR identifier hosted on EUWarranty.eu. When scanned, the QR code leads to a verification page displaying the issuer's identity, guarantee

details, and validity period. The platform supports multiple scenarios: pre-printed cards, POS-generated QR codes, and digital delivery for online sales.

5. Legal Documents Overview

The following legal templates govern relationships among EUWarranty.eu, issuers, and consumers:

- Platform Terms of Use – outlines responsibilities, data roles, and permitted uses.
- Guarantee Issuer Agreement – defines issuer liability, obligations, and use of the EUWarranty verification mark.
- Data Processing Addendum (DPA) – describes GDPR roles, retention periods, and security obligations.

Example Clause – Guarantee Issuer Agreement

1. The Issuer acknowledges that all guarantees published via the EUWarranty.eu platform are issued solely by the Issuer and are legally binding between the Issuer and the consumer.
2. EUWarranty.eu acts as a technical intermediary providing digital registration, timestamping, and verification services.
3. The Issuer shall ensure that all guarantee content complies with Directive (EU) 2019/771 and national transpositions thereof.

Example Clause – Data Processing Addendum (DPA)

1. EUWarranty.eu acts as Data Processor on behalf of the Issuer (Data Controller) for the purpose of storing and verifying guarantee information.
2. Personal data shall be processed only for the provision of the guarantee registration and verification services.
3. EUWarranty.eu shall implement appropriate technical and organizational measures to protect personal data in accordance with Article 32 of the GDPR.
4. Data retention shall not exceed the guarantee validity period unless legally required.

6. Branding & Communication

EUWarranty.eu communicates using harmonized and legally compliant terminology:

- 'Legal Guarantee' – mandatory protection by sellers.
- 'Commercial Guarantee' – voluntary coverage by sellers, manufacturers, or brands.
- Marketing-friendly equivalents: 'EUWarranty Legal Protection' and 'EUWarranty Extended Guarantee.'

Approved tagline examples:

- 'One QR. One Guarantee. Across Europe.'
- 'Verified protection you can trust.'

7. Compliance Checklist

- Guarantee validity – Directive (EU) 2019/771 – Responsibility: Seller/Brand.
- Platform transparency – Article 17(3) – Responsibility: EUWarranty.eu.
- GDPR Data Roles – Responsibility: Defined in DPA.
- QR authenticity – Responsibility: EUWarranty.eu.

8. Next Steps

1. Finalize legal templates (Issuer Agreement, Platform Terms, DPA).
2. Develop QR code issuance and verification infrastructure.
3. Launch pilot with selected manufacturers and retailers.
4. Prepare EU-wide marketing campaign and multilingual rollout.

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