



CERTIFICATE

no. 467/23

ePrivacyseal GmbH
Große Bleichen 21, 20354 Hamburg, Germany

hereby certifies* that

as determined in the certification decision of 19 September 2023

OROPE Germany GmbH
Graf-Adolf-Platz 15 40213 Düsseldorf, Germany
as a controller in the sense of art. 4(7) GDPR

operates its product or service

„COTA - Customisation Over The Air“

version 19 April 2023

as defined in annex 1 and to the exclusion of the processing activities in annex 2 to this certificate

in conformity with the criteria catalogue for the “ePrivacyseal EU” (version 3.0 of May 2022)
of ePrivacyseal GmbH.

final audit day: 12/09/2023

next planned monitoring by 03/08/2025

period of validity: 04/08/2023 – 03/08/2025

Annex 1 to certificate no. 467/23

Definition of processing activities

"COTA - Customization Over The Air" is a feature to implement the different customization needs of carriers and aims to implement a unified management system to satisfy the requirements of different carriers. The COTA package with carrier customizations is installed on equipment available on the open market via cloud configuration. This feature allows the manufacturer to reduce the introduction of different versions for each carrier. Users are notified of new features provided by their provider and can download their provider's customizations. The advantages for COTA are fast response to the requirements of network operators, no need to release different OS versions and the possibility to use the same OS version with SIM cards from different network operators.

The COTA package with the network operators' customizations is installed on the devices available on the open market via the cloud configuration. This feature allows manufacturers to reduce the introduction of different versions for each carrier.

By installing COTA, after the device is sold on the open market or in the operator channel, the operator function is activated when the SIM card is inserted into the device.

How it works: when the user insert carrier's SIM card for the first time, the device checks for any available COTA packages with the requirements of the carrier that the user can install.

Another feature is that after the cell phone is activated and the user completes the boot wizard, the user can update the COTA package without restarting or stopping the cell phone.

Annex 2 to certificate no. 467/23

Excluded processing activities

This evaluation refers only to the above mentioned product and therefore only to the processes in which OROPE Germany and its customers are involved. The following functions are not within the scope of this evaluation:

- the device (smartphone) itself
- the WiFi or carrier network used for transmitting data
- the internal website for accessing the collected data (cota.oppoer.me)