C E R T I F I C A T E

no. 414/22

ePrivacyseal GmbH

Große Bleichen 21, 20354 Hamburg, Germany

hereby certifies* that

as determined in the certification decision of 13 October 2022

ZTE

operates its product or service

„System Upgrade"

version FOTA.12.0.0 as of 05/05/2022

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 of ePrivacyseal GmbH, version 3.0 of Mai 2022.

final audit day: 10/10/2022

next planned monitoring by 09/10/2024

period of validity: 10/10/2022 – 09/10/2024

Annex 1 to certificate no. 414/22

Definition of processing activities

System Upgrade can be used for updating services es described in the following function:

System update is a service for updating terminal equipment systems and operators' customized services. The system update service helps the user to fix the system security vulnerabilities of their devices. The users' devices may automatically download and install such updates, and send update notifications in a timely manner. It is also possible to manually initiate the version upgrade process-.

Annex 2 to certificate no. 414/22

Excluded processing activities

The following functions are not within the scope of the evaluation:

- System Upgrade as it is provided to users outside of the EU/EEA.
- The usage of the EU Version of System Upgrade outside of the EU/EEA.
- Any other ZTE services or third party services or service providers connected or associated with or using ZTE System Upgrade.
- Sales Analyisis function including counting and analyzing sales of products (because this is not used in EU/EEA or with European Users).
- Any functions of System Upgrade aside of System Update.
- Processing of statistical data or for other purposes not listed in functions or data types.
- Any transfer of personal data out of EU/EEA.
- The usage of personal data by ZTE or any of their affiliates or 3rd parties for purposes like - but not restricted to:
    * any BI applicaition or AI learning (this includes all activities of the BI or carried out in connection with it)
    * Analytics and development purposes, including creating aggregated groups based on usage activities
    * Targeting and directed marketing activities
    * customer relationship management and customer care
    * support and communication
    * conducting customer surveys and customer complaint handling
    * maintenance, problem diagnosis and fixing
    * user identification
This includes also any back-end services and processes which relate to the a.m. operations.
- Third-Party apps, that may interact with System Upgrade or any other app or service provider providing a service.
- Examination of TOMs of any processor or controller apart from ZTE.