



CERTIFICATE

no. 318/20

ePrivacyseal GmbH
Große Bleichen 21, 20354 Hamburg, Germany

hereby certifies* that

as determined in the certification decision of 9 December 2020

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 1.0 of 13/11/2020

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 2.1. of May 2018.

final audit day: 08/12/2020

next planned monitoring by 07/12/2022

period of validity: 08/12/2020 – 07/12/2020

Annex 1 to certificate no. 318/20

Definition of processing activities

"COTA – Customisation Over The Air" is a feature for implementation of the different customisation needs of carriers. It aims to the implementation of a uniform management system for the satisfaction of the requirements of various carriers. COTA package with Carriers' customisations is installed on the version of devices available in the open market through cloud configuration. This feature render manufacturer able to reduce the launch of different versions for each carrier. Users will be informed about new features provided by their carrier and through which users can download their carriers' customizations. The benefits for COTA are fast response to carriers' requirements, no need to issue different OS versions and allows to use the same OS version with SIM cards from different carriers.

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. This installation is done with the user's permission.

The data is transmitted in the background via an existing mobile phone connection to an server. The server is located in an AWS data center in Paris. It is not possible to retrieve stored data from the device. The queries themselves can only be accessed internally by the manufacturer via a website. The site is not accessible from outside.

The customisation starts after inserting a special SIM card. It only works for a selection of specific models. For the evaluation the OPPO A72 was used combined with a SIM card from the ORANGE Carrier in France.

Annex 2 to certificate no. 318/20

Excluded processing activities

All processing activities not named in annex 1 and are connected to the device (smartphone) itself, the WiFi or carrier network used for transmitting data and the internal website for accessing the collected data.