



CERTIFICATE

no. 319/20

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

„User Experience Program“

version 15/10/2020

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: 07/12/2022 – 07/12/2022

Annex 1 to certificate no. 319/20

Definition of processing activities

"User Experience Project" is a continuous plan to improve OPPO products, features, and services. The user is free to decide whether to join the project or not. If the user agrees to join, OPPO will collect the related data of users usage of OPPO products, features and services (including data of any problems the user encounters during use); and limited data of third-party applications interacting with OPPO products.

According to the manufacturer OPPO, the ToE "User Experience Program" (also known as "User Experience Project") is a programme to improve the user experience. This has the goal of collecting, transmitting and evaluating usage data in order to improve products and services for the user.

It is a solution integrated into the user interface operating system for OPPO Smartphones (ColorOS) to collect user activities. The collection extends exclusively to the OPPO apps. The "ColorOS" is the graphic essay or graphic interpretation based on the smartphone operating system "Android" and is automatically installed on the smartphones of the manufacturer OPPO.

Data collection and transmission is carried out via triggers, so-called technical "events", as they are typically used by graphic interfaces. The following events trigger the transmission of the data is then transmitted in the background to a server in encrypted form either via an active WLAN or via an existing mobile phone connection (using symmetrical TLS with the AES method). The server is located in an AWS computer centre in Paris.

It is not possible to query stored data from the device. The queries themselves can only be retrieved internally by the manufacturer via a website. The page is not accessible from the outside.

Annex 2 to certificate no. 319/20

Excluded processing activities

All processing activities not named in annex 1 and are connected to the device (smartphone) itself, the WiFi or mobile network used for transmitting data, the website of OPPO excluding the links for privacy policy and the website oppo.custhelp.com also the internal website for accessing the collected data.