



CERTIFICATE

no. 330/21

ePrivacyseal GmbH
Große Bleichen 21, 20354 Hamburg, Germany

hereby certifies* that

as determined in the certification decision of 17 February 2021

Aspiegel Limited
1F, Simmonscourt House, Ballsbridge, Dublin, D04 W9H6, Irland
as a controller in the sense of art. 4(7) GDPR

operates its product or service

„Assistant Today“

version 28/09/2020

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: 16/02/2021

next planned monitoring by 16/02/2023

period of validity: 17/02/2021 – 16/02/2023

Annex 1 to certificate no. 330/21

Definition of processing activities

Assistant Today provides local and cloud services in a compact application.

The scope of the evaluation is limited to the version of Assistant Today as it is provided by Aspiegel to users in the European Union (EU)/European Economic Area (EEA).

The following functions are subject to the evaluation:

- **Instant Access**
Users can bind functions to buttons to gain a quick access.
- **Greetings**
Provide local and online greetings which change every time when you slide in Assistant
- **News**
Provide news in the form of pictures, atlases and short videos.
- **Ads**
Providing personalized advertises for users.
- **Smart Care _ Moments**
The system will recommend relevant service cards according to the user's event or behavior data.
- **Push Data to BI**
Reporting user behavioral data and carrying out statistical analysis

Annex 2 to certificate no. 330/21

Excluded processing activities

The following functions and/or services and/or product-versions were not subject to the evaluation and have not been reviewed by the experts:

1. Assistant as it is provided to users outside the EU/EEA.
2. The usage of personal data by Aspiegel or any of their affiliates or 3rd parties for purposes like - but not restricted to ...
 - any BI applicaiton or AI learning (This includes all activies 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
 - software and system updates
 - user identification

This includes also any back-end services and processes which relate to the a.m. operations.
3. Third-Party apps that may interact with Assistant
4. The usage of the EU-version of Assistant outside of the EU
5. Examination of TOM of any processor or controller apart from Equant Network Services International (hereinafter "Orange")
6. The Module "Global Search" as it is covered by AI Search Evaluation
7. Any connected App to provide a service
8. Any connected service provider to provide a service
9. Any data type or data transfer to a server, an entity or third party not explicitly named in the evaluation
10. Any Payment Process or Huawei payment.
11. Any specific agreement or data protection regulations with specific third parties