C E R T I F I C A T E
no. 351/21

ePrivacyseal GmbH
Große Bleichen 21, 20354 Hamburg, Germany

hereby certifies* that

as determined in the certification decision of 01 June 2021

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

operates its product or service
„Huawei Device Authentication (TCIS) / EMUI 11"
version EMUI 11 of 21/09/2020
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: 29/05/2021
next planned monitoring by 31/05/2023
period of validity: 01/06/21 – 31/05/23

Annex 1 to certificate no. 351/21

Definition of processing activities

Huawei ID based Trust Circle Index Service (TCIS Service) is a security feature since EMUI 5.1, which provides authentication for devices using an identical Huawei ID account and enable devices to obtain the negotiation key of same Huawei ID which is needed to authenticate to Huawei (ID). All entities authenticated via TCIS / Huawei ID will therefore pe part of the "Trust Circle" of devices / entites which are trusted and further ensure that "data is only transferred among correct devices".

TCIS is a direct subsystem of Huawei ID which actually handles the authentication part for Huawei ID. TCIS Server as well as "External Server" are hosted on Apsiegel Limited (controller entity in EU, Ireland). Only data transfer between "External Server" and TCIS is the pushtoken.

Annex 2 to certificate no. 351/21

Excluded processing activities

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

1. TCIS used in version prior to EMUI 11 or above
2. TCIS as it is provided to users outside the EU/EEA.
3. The usage of personal data by Aspiegel or any of their affiliates or 3rd parties for purposes like - but not restricted to:
   - any BI applicaition or AI learning
   - 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
   This includes also any back-end services and processes which relate to the a.m. operations.
4. Other services provided by Aspiegel or any of their affiliates or any 3rd parties, that may interact with TCIS or Huawei ID.
5. Data processing of other products or services of Huawei using TCIS (like logging or all other processing of data).
6. Third-Party applications / services that may interact with TCIS (only TCIS itself is covered).
7. The usage of the EU/EEA-version of TCIS outside of the EU/EEA.
8. Examination of TOMs of any processor or controller apart from Aspiegel.
9. Other data transfers / use cases of servers mentioned as part of the infrastructure in this evaluation
10. Login using third-party services (Google, facebook, etc.)
11. Any information or data exchanged between different devices logged in HuaweiID account.
12. Any usage of the EU/EEA-version of Huawei ID by users, which have registered their Huawei ID outside of the EU/EEA.