



ePrivacyseal Global

C E R T I F I C A T E

no. 520/25

ePrivacyseal GmbH
Burchardstr. 14, 20095 Hamburg, Germany

hereby certifies* that

as determined in the certification decision of 22 September 2025

ZTE Corporation

Hi-tech South Road, ZTE Building, Hi-tech Industrial Park, Nanshan District, Shenzhen,
Guangdong Province, China.

provides its product or service

"ZXV10-SMP-V5.02.03_R"

version as available 27/12/2024

as defined in annex 1 and to the exclusion of the processing activities in annex 2 to this certificate.

final audit day: 22/09/2025

next planned monitoring by 21/09/2028

period of validity: 22/09/2025 – 21/09/2028

The certification decision takes place under the validity conditions described in Annex 3 and in conformity with the criteria catalogue for the "ePrivacyseal Global" (version 1.0 of February 2023) of ePrivacyseal GmbH.

*ePrivacyseal GmbH is not an accredited certification body within the meaning of art. 42(5) GDPR.

Annex 1 to certificate no. 520/25

Definition of processing activities

The product is a management and operation platform for set-top boxes, offered by ZTE either for on-premises deployment with the operator or as a SaaS/tenant model. The platform manages Android-based STBs (set-top boxes,) using TR-069 (CWMP) and HTTP/HTTPS for tasks such as version control and log management. It provides operations and maintenance functions, including remote configuration, firmware rollouts, diagnostics (e.g., ping, traceroute, speed tests), log analysis, and remote desktop/ADB access, as well as various reports (such as popular programs/apps and geographic distribution). The objective is to minimize on-site service (truck rolls), improve operational efficiency, and optionally deliver business and big data insights for marketing.

ZTE licenses the platform to network operators, with the option to provide operation and support services, including cloud deployment. Importantly, the data from STB customers is owned and controlled by the operator.

The concrete data flow/system architecture is described in the customer report.

Annex 2 to certificate no. 520/25

Excluded processing activities

Out of scope:

- Data of operator and their employees
- Customer contract or billing information
- Performance metrics
- Network topology and logical service structures
- Audit logs
- Integration data with external OSS/BSS or third-party systems
- network traffic passing through the device. Connection and traffic metadata.
- User behavior analysis, including browsing history, app usage, or device activity.
- Backup, restore, and disaster recovery data and workflows
- Personal data within system or operational log files
- Functions other than those mentioned in the “technical factual description”. Any other processing of data than those mentioned in "technical factual description" and any other data than those mentioned in "data types". Especially any other data that is maybe processed in managing, controlling or maintaining devices.
- Any service, maintenance, troubleshooting or other assisting by ZTE's or other entities in China or any taking part in the processing of data by such entities or any data transfer to them.
- Any transfer of data out of the EU or any processing outside of the EU. Cloud servers used or the operator's own data centres must be located exclusively in the EEA, and data may only be processed there and may not leave these borders.
- Compliance of Operator using the product, for example fulfilment of any documentation obligations under GDPR by operator or policies by operator. The seal certifies that the product can, in principle, be used in accordance with the criteria catalog. The specific use by a particular operator (or anyone else using/deploying the product) and under specific conditions and the data protection assessment of their use of the product are therefore not covered by this seal.
- Creation of individual customer profiles (instead of just aggregated evaluations) or links between devices and individual customer accounts.
- Data Processing Agreements or other agreements with operators using or deploying the product or any other processing where ZTE acts as processor or sub-processor.
- DPIA of controller or anyone using / deploying the product
- Usage of third parties (by the operator, other controllers or parties deploying the product).

Annex 3 to certificate no. 520/25

Validity conditions

- The product is used by a telecommunications operator solely in Germany or in the European Union, whereby all data remains within this area and cannot be processed or accessed from outside.
- The product is processing only personal data that is listed in "Data Types" and no other personal data, especially of end users.
- There is a method and process in place that allows data subjects to easily exercise all of their data subject rights according to GDPR.
- The operator establishes a sufficient legal basis for processing the data, in particular in acc. to Art. 6 I lit a) or b) GDPR. In case consent has to be obtained, this is done by the operator according to the legal requirements including Art. 7 GDPR, in a timely and easily understandable manner. The operator also provides sufficient information according to Art. 13, 14 GDPR.