



ePrivacyseal Global

C E R T I F I C A T E

no. 511/25

ePrivacyseal GmbH
Burchardstr. 14, 20095 Hamburg, Germany

hereby certifies* that

as determined in the certification decision of 25 June 2025

ZTE Corporation

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

provides its product or service

"ZXA10 C600/C650/C620 V3.0.x"

version as available 04/12/2024

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

final audit day: 25/06/2025

next planned monitoring by 24/06/2028

period of validity: 25/06/2025 – 24/06/2028

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

Annex 1 to certificate no. 511/25

Definition of processing activities

The product will be sold to the Operator/Carrier (as Data Controller), who provide the deployment environment and operation. User data is owned and stored by the Controller.

The ZXA10 C600, ZXA10 C650, and ZXA10 C620 are series optical access CO equipment launched by ZTE Corporation. OLT stands for Optical Line Terminal, which is an optical access central office equipment.

It acts as a switch or router in a traditional communication network, and is a device at the entrance of the external/internet network. The basic functions are traffic scheduling, buffer control, provide user-facing PON (passive optical network) interfaces and allocates bandwidth. To put it simply, to the upstream, complete the uplink access of the PON network; to the downstream, send network traffic to the ONU devices.

Annex 2 to certificate no. 511/25

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 and other logs
- Integration data with external OSS/BSS or third-party systems
- SIP data, video data and other end user data not listed in "data types"
- Backup, restore, and disaster recovery data and workflows
- network traffic passing through the device
- Connection and traffic metadata
- User behavior analysis, including browsing history, app usage, or device activity,
- Location data or geolocation services
- Information about end-user devices such as MAC addresses, hostnames, or device types
- Remote access or support interactions by technicians
- QoS data, bandwidth control, or prioritization mechanisms for services
- Technical operational data beyond the defined categories
- Security logs or intrusion detection events
- Data related to user interactions with the local web interface of ONT/ONU devices
- Personal data within system or operational log files
- devices that are not used for router's network settings management
- Camera Mac, IP, Audio, video and picture and all functions and prprocessings related to IPC Internet Protocol Camera
- Functions other than those listed in the "technical factual description". Any other processing of data than those listed in "technical factual description" and any other data than those listed 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 entitiie 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.
- Compliance of Operator using the product (for example fulfilment of any documentation obligations under GDRP, policies, documentation and obligations regarding data subject rights). 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 covert by this seal.
- Data Processing Agreements or other agreements with operators using or deploying the product or any other processing where ZTE acts as processor oder sub-processor.
- DPIA of controller or anyone using / deploying the product

Annex 3 to certificate no. 511/25

Validity condition

- 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.