

ZTE Compliance Commitment on EU Data Act

Version: 1.0

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Introduction

ZTE Corporation and its subsidiaries (collectively, "ZTE", "us", "we", or "our") respect your right and currently adhere to relative requirements under [EU Data Act \(Regulation \(EU\) 2023/2854\)](#) (Hereinafter collectively referred to as "Data Act").

As Data Act required, as Product Manufacturer, ZTE provide Smartphones, Smartwatches, Routers, STBs, CPEs as well as the other home mobile devices that may be defined as the "Connected Product" according to the Article 2 and Article 3 of Data Act. To ensure Users or its representatives or its designed Data recipient (collectively, "you", "your") can easily access such "product data and related service data", ZTE make great efforts and research on product analysis and data mapping and to prepare provide the following information in accordance with Data Act via this statement.

Accordingly, ZTE would like to clarify that, as a Product Manufacturer, we can only provide the data that we may hold. If data is owned/held by yourself (users or clients), we are unable to provide because of there is no technical or legal pathway that enables ZTE to access.

For example, when you modifies the device configuration or sends or receives SMS messages through the smartphone, such content is owned by yourself and is not accessible to us. Similarly, network connection information such as Mobile cellular network status, and signal strength, which may hold by your telecommunications operator. Therefore, such data we believe may not fall within the scope of "Generated Product Data".

Although partial data are not held by ZTE, ZTE will still inform you, through product instructions or privacy policies or other feasible methods compliant with Data Act, on how to access and retrieve these data on your devices which we may provide.

Please understand that product data may contain personal data. Based on the consideration of protecting personal privacy stipulated in the EU GDPR, we do not present the details of personal data in this statement. If you have any questions about the personal data generated during the use of such products and their processing activities, please refer to [ZTE Privacy Policy](#).

The following information is provided in accordance with the EU Data Act.

1. Data Holder or Data Holding Entity

Enterprise Name: ZTE Corporation and its subsidiaries.

Registered Address: ZTE plaza, Keji Road South, Hi-Tech Industrial Park, Nanshan District, Shenzhen, P.R. China.

Regarding registered address of our subsidiaries, please refer to: [Corporate Information-ZTE](#) .

2. Connected Products

"Connected Product" means an item that obtains, generates or collects data concerning its use or environment and that is able to communicate product data via an electronic communications service, physical connection or on-device access, and whose primary function is not the storing, processing or transmission of data on behalf of any party other than the user in accordance with Article 2 (5).

ZTE provide Smartphones, Smartwatches, Routers, STBs, CPEs as well as the other home mobile devices that may defined as the “Connected Product” according to the Article 2 and Article 3 of Data Act. Such products functions and further information are described in this statement:

3. Product Data

As Data Act stated, Data Holders are required to share user-generated data derived from the use of connected products and related services. This mandate safeguards users' autonomous control over their own data and establishes accessible pathways for data sharing with recipients, thereby facilitating the free flow of data within the EU.

Consequently, based on the definitions of connected products and the product data and take into consideration of the legislative intent and substantive objectives behind the Act – we have categorized our product data according to the following criteria, as detailed in the accompanying list.

(1) The definition of Connected Products and Product Data;

(2) The types of products provided by ZTE;

(3) The scope of data that ZTE can hold;

Connected Product		Data types	Can the data be generated continuously	Can the data be generated in real time	Is it personal data	Data format and magnitude	Storage method and duration
Product type	Business function module						
STB	Configuration	Version number	No	No	No	String format, occupying about 10-20 characters	Stored in the device's local flash memory until the next version update
		Operating system information	No	No	No	String format, occupying about 15-30 characters	Stored in local flash memory, retained for a long time until system upgrade
		IP address	Yes	Yes	No	Dot-decimal string, occupying about 15 characters	Temporarily stored locally, retained as the last valid IP after network disconnection

							, and updated upon reconnection
		MAC address	No	No	Yes	Hexadecimal string (with colons), occupying about 17 characters	Stored in the set-top box's hardware chip (e.g., EEPROM), permanently retained
		Subnet mask	Yes	Yes	No	Dot-decimal string, occupying about 15 characters	Temporarily stored locally, updated with network configuration changes
		Gateway address	Yes	Yes	No	Dot-decimal string, occupying about 15 characters	Temporarily stored locally, updated with network configuration changes
		DNS server address	Yes	Yes	No	Dot-decimal string, occupying about 15 characters	Temporarily stored locally, updated with network configuration changes
		Device name	No	No	No	String format, occupying about 20-50 characters	Stored in local flash memory, retained for a long time until the next modification
		Hardware model	No	No	No	String format, occupying about 10-20 characters	Built into the hardware chip, permanently retained
		Network connection	Yes	Yes	No	String format,	Temporarily

		status				occupying about 10-15 characters	stored in local memory, refreshed in real time
		Storage space information	Yes	Yes	No	String + number format, occupying about 20-30 characters	Calculated and displayed in real time locally, no separate storage of historical data
		CPU model	No	No	No	String format, occupying about 15-30 characters	Stored in local flash memory, permanently retained
		Memory capacity	No	No	No	String + number format, occupying about 10-15 characters	Stored in local flash memory, permanently retained
CPE	ZLife/ZLife lite	Terminal common user-Account	No	No	Yes	String format, a single field must be less than 64 characters	Storage mode: Germany AWS server is used in Europe. Retention period: Saved to the time when the user cancels the account. Expiration handling method: Delete
		Terminal common user-Password	No	No	Yes	String format, a single field must be less than 64 characters	
		Terminal common user-Terminal Router SN(it may bind multiple devices and contain multiple SNs)	No	No	No	String format, a single field must be less than 64 characters	
		Router-SN (Just bind single device)	No	No	No	String format, a single field must be less than 128 characters	
		Router-MAC	No	No	Yes	String format, a single field must be less than 64	

						characters	
		Router-IP	No	Yes	No	String format, a single field must be less than 64 characters	
		Router-Model	No	No	No	String format, a single field must be less than 64 characters	
		Router-Vendor	No	No	No	String format, a single field must be less than 64 characters	
		Router-Version	No	No	No	String format, a single field must be less than 64 characters	
5G FWA 5G MBB 4G FWA 4G MBB Wifi router	System upgrade	Device software version number -curversion	No	No	No	String format, a single field must be less than 128 characters	Storage mode: Germany AWS server is used in Europe. Storage period:The information about the last upgrade of the user equipment is stored for five years for the system upgrade need. Expiration handling method: Delete
		Device IMEI or SN-oid	No	No	Yes	String format, a single field must be less than 64 characters	
		Device Product Model-subtype	No	No	No	String format, a single field must be less than 64 characters	
	ZTE Smart Life	Terminal common	No	No	Yes	String format, a	Storage

		user-Account				single field must be less than 64 characters	mode: Germany AWS server is used in Europe. Retention period: Saved to the time when the user cancels the account. Expiration handling method: Delete
		Terminal common user-Password	No	No	Yes	String format, a single field must be less than 64 characters	
		Terminal common user-Terminal Router SN(it may bind multiple devices and contain multiple SNs)	No	No	No	String format, a single field must be less than 64 characters	
		Router-SN (Just bind single device)	No	No	No	String format, a single field must be less than 128 characters	
		Router-MAC	No	No	Yes	String format, a single field must be less than 64 characters	
		Router-IP	No	Yes	No	String format, a single field must be less than 64 characters	
		Router-Model	No	No	No	String format, a single field must be less than 64 characters	
		Router-Vendor	No	No	No	String format, a single field must be less than 64 characters	
		Router-Version	No	No	No	String format, a single field must be less than 64 characters	
Smart phone	System update	Device IMEI or MEID or SN	No	No	Yes	string format, Less than 64 characters	Storage mode: Germany AWS server
		Device software	No	No	No	string format, Less	

		version number -curversion				s than 128 characters	is used in Europe.
		Device Product Model-subtype	No	No	No	string format, Less than 64 characters	Storage period: The information about the last upgrade of the user equipment is stored for five years. Expiration handling method: Delete
	Nubia advertisement	Google Advertising ID (GAID) OR iOS (IDFA))	No	No	Yes	string format, Less than or equal to 32 characters	Stored in Germany for 60 days.
		Disable Restriction on Advertisement Tracking ID	No	No	No	string format, Less than or equal to 2 characters	
		System ua Information	No	No	No	string format, Less than or equal to 1024 characters	
		Client IP	Yes	Yes	Yes	string format, Less than or equal to 64 characters	
		Device Model	No	No	No	string format, Less than or equal to 20 characters	
		Screen Width	No	No	No	string format, Less than or equal to 10 characters	
		Screen Height	No	No	No	string format, Less than or equal to 10 characters	
		Device Manufacturer	No	No	No	string format, Less than or equal to 20 characters	
		Application Version	No	No	No	string format, Less	

		Number				s than or equal to 20 characters	
		Application Package Name	No	No	No	string format, Less than or equal to 255 characters	
	ZTE Care (Overseas)	Device software version number -curversion	No	No	No	string format, Less than 64 characters	Server query data is used and is not stored.
		Device OS Information-Android Version	No	No	No	string format, Less than 64 characters	
		Device Product Model-subtype	No	No	No	string format, Less than 64 characters	
		App VersionName	No	No	No	string format, Less than 64 characters	
		App VersionCode	No	No	No	string format, Less than 64 characters	
		Device OS Information-Language	No	No	No	string format, Less than 64 characters	
		Device OS Information-Country	No	No	No	string format, Less than 64 characters	
	zboard(overseas)	Device Type	No	No	No	string format, Less than 10 characters	Server query data is used and is not stored.

Please understand that product data details may change based on the following criteria:

- 1) To be consistent with guidance that may be issued from time to time by EU agencies in the future;
- 2) To be consistent with ZTE's business strategy or changes in product functionality.

4. Data sharing and access implementation

4.1 Data Sharing Rules

Natural or legal persons that owns ZTE's connected product or to whom temporary rights to use that connected product have been contractually transferred, or that receives a related service maybe defined as ZTE Users (hereinafter referred to as "Users"). If you are a user you will enjoy such legal right under the Data Act over the data being generated by the connected product or related service.

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4.2 Data Sharing Scenarios

Data sharing can be divided into three scenarios as follows: Business-to-Consumers (B2C), Business-to-Business (B2B), Business-to-Government (B2G).

If you are an individual user, enterprise owning ZTE connected products, or a public entity requesting data to fulfill public interest tasks under EU law, please contact us via this dedicated email address: [Privacy@zte.com.cn].

We will review your request within a reasonable timeframe and provide product data in a manner compliant with Data Act.

Please note that to access your request, for verifying whether a natural or legal person qualifies as a user, you must provide necessary information (which may including but not limited to personal data). Given providing assessment support, these data may be transferred from your location to China. If you refuse to provide such data, we may not be able to support your request, such as:

- 1) Your email address;
- 2) Recipient's email address (for data transmission);
- 3) Other information help us to assess your requests.

ZTE reserves the right to decline requests if:

- 1) Submitted information is insufficient;
- 2) The request seeks others' personal data without legal basis;
- 3) The data involves trade secrets or IP-protected content;
- 4) The recipient is designated as a gatekeeper pursuant to Article 3 of Regulation (EU) 2022/1925.

If your request is denied, we will provide a reasoned explanation without undue delay.

As required by Data Act, if you receive such data, please keep the reasonable use within the applicable law. You shall not to use obtained data to develop a connected product that competes with the connected product from which the data originate, nor share the data with a third party with that intent and shall not use such data to infer sensitive information such as assets and production methods, etc. of ZTE.

5. Data security protection mechanism

To prevent potential unauthorized access, use, or disclosure, we implement necessary technical and organizational security safeguards to ensure data and its sharing are reasonably protected. These include, but are not limited to:

- 1) Encrypted transmission technologies (e.g., TLS 1.3);
- 2) Access control mechanisms (e.g., role-based permissions);
- 3) Audit logging for full traceability;
- 4) Regularly review security practices regarding data collection, storage and processing to keep update with industry-standard practices;
- 5) Other safeguards maybe adopted to comply with applicable law.

Data will be shared in machine-readable, commonly used formats (e.g., JSON/XML).

You must ensure that you or your designated recipients maintain industry-standard security practices to protect shared data.

6. Data request mechanism

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If you have such data request under Data Act, you may submit requests via the following channel:[Privacy@zte.com.cn],or mail us through the following address: Data Compliance Dept. of ZTE Corporation, No. 55, Hi-Tech Road South, Shenzhen, P.R. China (postcode: 518057). We may assess your request within reasonable time limit.

7. Update to this statement

With the gradual improvement of applicable laws and regulations and the continuous adjustment of business, ZTE may update this statement from time to time. If this statement is revised, we will release the latest version in a timely manner, and publish it in a noticeable place on our official website. For major changes, we will also provide more noticeable notifications.

8. Reservation

ZTE reserves the right to modify, update or terminate any term contained in the Statement at any time. Please understand that this does not constitute legal advice to you.