

Fairphone’s Connected Products & Related Services
Data Disclosure Statement

Your Fairphone, Fairbuds and the related applications generate non-personal data, known as product and service data, to optimize their functioning. In this document, we are providing you with information about your devices and applications’ data generation, use and storage capabilities, in accordance with the Data Act (Regulation (EU) 2023/2854). The information in this document is only applicable to product data and service data. For more information about Fairphone’s treatment of personal data, please consult our Privacy Policy: <https://www.fairphone.com/en/legal/fairphone-privacy-policy>.

A “**connected product**” is an item that obtains, generates or collects data concerning its use or environment, and that is technically able to communicate this data, without product data storage, processing or transmission being the item’s primary function. A “**related service**” is a digital service which is connected with the product at the time of purchase or that is later connected to the product to add, update or adapt the functions of the connected product. For Fairphone, the following classification applies:

Fairphone’s Products & Services	
Connected Products	Related Services
Smartphones (Fairphone 5, Fairphone 6), Audio Products (Fairbuds, Fairbuds XL)	MyFairphone App, Fairbuds App, Fairphone Moments, Fairphone Activation Logger

In Annex 1, you will find more information about (1) the type, format, and estimated volume of data the products or services can generate, (2) whether this data is generated continuously and in real-time, (3) the storage of this data, and (4) how to access this data.

Unless specified otherwise, the data holder for product and service data is FairPhone B.V., Van Diemenstraat 200, 1013 CP Amsterdam, Netherlands, registered under number 55901964 (“**Fairphone**”). You can contact us in relation to this statement, including for data sharing requests, by sending an email to: product.compliance@fairphone.com.

If you believe your rights under Chapter II of the Data Act have been infringed, you may lodge a complaint with the Dutch Data Authority (*Autoriteit Persoonsgegevens*) or with the competent authority in your EU Member States.

Some datasets may contain trade secrets of Fairphone or its suppliers (e.g., proprietary diagnostic parameters). Where the trade secret holder is not Fairphone, this will be indicated in the relevant dataset description along with the holder’s identity.

The data access arrangements under this statement remain in effect for the duration of your ownership, lease, or rental of the connected product or subscription to the related service. You may terminate these arrangements at any time by ceasing use of the product/service and requesting deletion of your stored data.

ANNEX 1: FAIRPHONE PRODUCTS & SERVICES DATA

1. Related Services (MyFairphone App, Fairbuds App, Fairphone Moments, Fairphone Activation Logger)

Data Category	Data Type	Data Format	Estimated Volume	Data Generation	Data Storage & Usage
Account and profile data	company info, login identifiers, device push ID, consent flags	String / integer / boolean	~0.5–1 KB	Event-driven (at sign-up, login, or setting changes)	Temporary (app memory until transmitted; then retained in backend) *
Device snapshot	model, color, RAM, storage, IMEIs, serial, OS build	String / integer	~0.5 KB	Event-driven (registration, diagnostics)	Temporary (app memory until transmitted; then retained in backend) *
Timeline events	goal changes, views, origin)	String / integer	~0.1 KB	Event-driven (when user views or edits longevity goal)	Temporary (app memory; uploaded immediately) *
Device health metrics	storage use, RAM use, battery temperature, uptime	Integer / float	~0.1 KB	Event-driven (when health check screen opened)	Volatile
Survey responses	NPS score, explanation, expected longevity, device milestone	String / integer	~0.25 KB	Event-driven (when survey submitted)	Temporary (until submission; stored in backend systems)
Google Analytics: default events	session_start, first_open, screen_view, user_engagement	String / integer / timestamp	~0.25 KB	Continuous during app use	Volatile (GA SDK until upload)
Google Analytics: custom events	create_mode, switch_on/off with mode details	String / integer / timestamp	~0.25 KB	Event-driven during feature use	Volatile (GA SDK until upload)
Fairbuds App – accessory connection data	Bluetooth name, firmware version, battery level	String / integer	~0.05 KB	Event-driven (when earbuds connect)	Temporary (device OS/Bluetooth cache; not stored or backend)
Fairphone Moments – user preferences	modes, default mode, switch state, wallpaper, app visibility, notification settings, power-saving features	String / integer / boolean	~0.5–1 KB	Event-driven (when configured or changed)	Stored (on device)
Activation Logger: activation report	date/time, device identifiers, OS/build details	String / integer / timestamp	~1 KB	Event-driven (first activation)	Temporary (local until uploaded to backend)
Activation Logger: daily heartbeat	timestamp, firmware fingerprint	String / integer / timestamp	~0.25 KB	Continuous (once daily)	Temporary (local until uploaded to backend)
Activation Logger: legacy cell/network info (	MCC-MNC, Cell-ID, TAC, operator_name	String / integer / timestamp	~0.25 KB	Event-driven (OS update)	Temporary (local until uploaded to backend)

*Stored and processed by Fairphone in its own databases, customer relationship management (CRM) systems (Odo), digital experience (DX) platforms (Bloomreach) for service improvements, and/or analytics tools (Google Analytics) for usage analytics.

2. Smartphones (Fairphone 5, The Fairphone (Gen. 6))

The information provided below is indicative and based on the stock version of the products. The estimated volume, data generation and data storage information found in the table below may vary depending on the user's installed application and permissions given to applications.

Data Category	Data Type	Data Format	Estimated Volume	Data Generation	Data Storage
Accelerometer	X, Y, Z linear acceleration (m/s ²)	float	~64 B	Continuous	Volatile
Gyroscope	Angular velocity around X, Y, Z (rad/s)	float	~64 B	Continuous	Volatile
Magnetometer	Magnetic-field vectors X, Y, Z (μT)	int	~64 B	Continuous	Volatile
Proximity sensor	Near/far binary state (0/1)	float	~1 B	Event-driven (when near an object)	Volatile
Ambient light sensor	Illuminance level (lux)	float	~4 B	Continuous	Volatile
Barometer	Atmospheric pressure (hPa) & altitude estimate (m)	int	~8 B	Continuous (when location services active)	Volatile
Hall switch	Magnetic-field presence (open/close 0/1)	int	~1 B	Event-driven (cover open/close)	Volatile
GNSS-derived coordinates (GPS/GLONASS/Gallelio/BeiDo u))	Latitude, longitude, altitude, speed, Satellite count, HDOP (m/s)	Float, string	~128 B	Continuous (when location services active)	Temporary (location cache)
Cell tower-based location	Cell ID, MCC, MNC, signal strength (dBm)	string	~128 B	Continuous	Temporary (modem logs)
Wi-Fi positioning	SSID, BSSID, RSSI (dBm), frequency band	string	~128 B	Continuous (when Wi-Fi scanning active)	Temporary (Wi-Fi cache)
BLE-based indoor location	Beacon UUID, signal strength (RSSI), proximity zone	string	~128 B	Continuous (when BLE scanning active)	Temporary (cached)
E-compass	Azimuth (°), pitch (°), roll (°)	float	~32 B	Continuous (when location services active)	Volatile
Fingerprint match scores	Match score (0-100), template ID, retry count	float/int	~32 B	Event-driven (authentication attempt)	Temporary (secure enclave)

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Face recognition match scores	Match score (0-100), face ID, liveness flag	float	~32 B	Event-driven (authentication attempt)	Temporary (secure enclave)
Sensor usage logs & error records	Sensor ID, usage count, error code, timestamp	String	~32 B	Event-driven (use/error)	Temporary (device log files)
Authentication attempt history	Auth method, success/fail flag, timestamp, failure reason	String	~1 KB	Event-driven (authentication attempt)	Temporary (secure enclave)
Image Sensor	ISO, shutter, HDR settings	String	~1 KB	Event-driven (photo/video capture)	Stored (if user captures media)
OIS/EIS Logs	Optical/ Electronic Image Stabilization	String	~1 KB	Event-driven (photo/video capture)	Volatile
Depth/ToF Frames	Depth and Time-of-Flight data	Float	~1 KB	Event-driven (photo/video capture)	Volatile
Microphone raw PCM (if analyzed)	16-bit/24-bit PCM samples, sample-rate, amplitude arrays	float	~32 B	Continuous (during active audio capture)	Stored (if user captures audio)
Audio latency & beamforming logs	Round-trip latency (ms), mic-array weights, steering angle	string	~256 B	Event-driven (during voice call/recordings)	Volatile
Voice-assistant invocation logs	Wake-word ID, timestamp, confidence score, session result	string	~256 B	Event-driven (wake word)	Stored (assistant app logs)
Ambient noise level classification	Noise class, dB SPL estimate, timestamp	int / float	~256 B	Continuous (during active mic monitoring)	Volatile
Touch position/velocity/pressure	X,Y coordinates, velocity vectors (px/s), pressure (g)	float	~256 B	Continuous (during touch interactions)	Volatile
Brightness adjustment history	Timestamp, new brightness %, trigger source (auto/manual)	string	~256 B	Event-driven (on change)	Stored (display settings logs)
Display rendering parameters	Color profile ID, refresh rate (Hz), gamma curve index	string	~256 B	Static/Dynamic (per mode)	Stored (system display config)
Touch diagnostics	Touch event counts, error flags, calibration offsets	int / float	~256 B	Event-driven (during tests)	Stored (diagnostic logs)
Battery telemetry	Charge cycles (int), temperature (°C), capacity (mAh)	int / float	~256 B	Continuous (period samples)	Stored (battery stats)
Charging curve	Voltage (V) vs. current (mA) time-series	float	~256 B	Continuous (during charging)	Volatile
USB/PD negotiation logs	PD revision, power contract (W), cable ID, error codes	string	~1 KB	Event-driven (cable connect)	Stored (USB system logs)

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Thermal throttling events	Timestamp, component, throttle duration (ms), temp (°C)	string	~1 KB	Even-driven (thermal thresholds)	Stored (thermal logs)
Per-component power draw	CPU, GPU, RF, display mA or mW usage over time	float	~1 KB	Continuous	Temporary (power stats)
Cellular logs	Band, RAT, RSSI/RSRP, VoLTE flag	string	~1 KB	Continuous (during connection)	Temporary (modem logs)
Wi-Fi logs	SSID, RSSI, auth type, disconnect reason	string	~1 KB	Continuous (during connection)	Temporary (Wi-Fi logs)
Bluetooth logs	Connection state, MAC, profile ID, error code	string	~1 KB	Continuous (during connection)	Temporary (BT logs)
NFC transactions (metadata)	Transaction ID, service type, status, timestamp	string	~1 KB	Event-driven	Stored (NFC service logs)
eSIM provisioning & OTA logs	ICCID, profile version, OTA result, timestamp	string	~1 KB	Event-driven	Stored (secure element)
Crash logs	Tombstone stack trace, panic reason, CPU registers	string	~1 KB	Event-driven	Temporary (system logs)
System uptime/boot logs	Boot timestamp, uptime (s), boot reason, bootloader version	string	~1 KB	Event-driven (on boot)	Temporary (boot logs)
Thermal events	Component, temperature (°C), throttle level, timestamp	string	~128 B	Event-driven (thermal thresholds)	Temporary (thermal logs)
App usage duration & state	Package name, foreground time (ms), top-activity flag	string	~128 B	Continuous (during app use)	Temporary (usage stats)
Notification interaction logs	Package, action (tap/dismiss), timestamp	string	~128 B	Event-driven	Temporary (notification logs)
Install/uninstall history	Package name, version code, action, timestamp	string	~256 B	Event-driven	Temporary (package manager)
Default app settings	Intent category, default package, timestamp	string	~256 B	Static	Stored (settings)
Digital wellbeing metrics	Screen-time (ms), app category, unlock count, timestamp	string	~256 B	Continuous	Temporary (wellbeing logs)
BT device connection	MAC address, profile (A2DP/HFP), connect/disconnect flag	string	~256 B	Event-driven	Stored (BT logs)
Accessory battery/firmware info	Battery % (int), firmware version, accessory model ID	string	~256 B	Event-driven	Stored (accessory profile)

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USB accessory logs	VID/PID, USB class, connect event, power draw (mA)	string	~256 B	Event-driven	Temporary (USB logs)
Display casting events	Cast protocol (Miracast/Chromecast), session start/end	string	~256 B	Event-driven	Stored (casting service logs)
Input device usage logs	Device type (keyboard/mouse), usage duration (ms), PID	string	~256 B	Continuous (during input)	Temporary (input logs)
Backup metadata	Last backup epoch, total size (MB), file count	string	~256 B	Event-driven (on backup)	Stored (backup services)
Sync status per service	Service ID, last sync epoch, success/error flag	string	~256 B	Event-driven (on sync)	Stored (sync services)
Login/auth token usage	Token hash, scope, last refresh epoch, TTL (s)	string	~256 B	Event-driven	Stored (secure element)
Cloud storage usage	Provider ID, quota used (GB), quota total (GB)	string	~256 B	Continuous (when synching)	Stored (cloud client)
Verified boot status	Boot state (green/yellow/orange/red), rollback index, key ID	int / string	~256 B	Event-driven (on boot)	Stored (secure boot log)
Secure enclave operation logs	Command ID, result code, timestamp, elapsed cycles	string	~256 B	Event-driven	Temporary (secure enclave)
Key provisioning logs	Key alias, provisioning epoch, attestation verdict	string	~256 B	Event-driven	Stored (secure enclave)
Security patch event logs	Patch level string, install epoch, reboot required flag	string	~256 B	Event-driven (on patch)	Stored (system update logs)
Permission usage history	Permission group, package, last access epoch	string	~256 B	Event-driven	Stored (app ops logs)
Remote diagnostic sessions	Session ID, start/end epoch, diagnostic commands, result	string	~1 KB	Event-driven	Temporary (diagnostic logs)
Repair/component replacement logs	Component SN, replacement epoch, technician ID, status flag	string	~1 KB	Event-driven	Stored (service history logs)
Remote wipe/lock logs	Command type (wipe/lock), timestamp, initiator ID, success	string	~512 B	Event-driven	Stored (device management logs)
Root/jailbreak detection	Detection flag, method hash, timestamp, security verdict	int / string	~256 B	Event-driven	Stored (security logs)
Pairing history with other devices	Local device ID, remote device ID, pairing epoch, transport	string	~256 B	Event-driven	Stored (BT logs)

Cross-device session continuity	Session token, app package, handoff epoch, continuity flag	string	~512 B	Event-driven	Stored (session continuity logs)
Clipboard/content sync logs	Sync type (text/file), hash, source/dest device, timestamp	string	~512 B	Event-driven	Temporary (clipboard manager)
Companion device status logs	Device type, battery %, connection quality, last seen epoch	string	~256 B	Event-driven	Stored (accessory status logs)

3. Audio Products (Fairbuds, Fairbuds XL)

The information provided below is indicative and based on the stock version of the products. The estimated volume, data generation and data storage information found in the table below may vary depending on the user’s installed application and permissions given to applications.

Data Category	Data Type	Data Format	Estimated Volume	Data Generation	Data Storage
BT accessory name	Earbuds model string	string	~32B	Event-driven (pairing)	Temporary (until unpaired)
Battery level	battery_percentage	int	~4B	Continuous (when connected and active)	Temporary (device status memory)
Buffer of music	Wave form data	string	~4KB	Event-driven	Temporary (device status memory)
Firmware version (inc audio codecs)	firmware_version	string	~4MB	Continuous (when device is active)	Stored (on the device)
Pairing Data	devices_paired	string	~256 B	Event-driven	Stored (on the device)