OPPO EU Data Act Notice

Version: v1.0

Effective Date: 2025-09-12

This Notice is provided in accordance with the EU Data Act (Regulation (EU) 2023/2854) (the “EU Data Act”).

1. Data Holder Information

Data Holder : Guangdong OPPO Mobile Telecommunications Corp., Ltd. (“OPPO”, hereinafter referred to as “**We**” or “**Us**”).

Registered Address:NO.18 HaiBin Road, Wusha Village, Chang'an Town, DongGuan City, Guangdong Province, P.R. China.

We act as the **data holder** under the EU Data Act for the connected products described below.

2. Connected Products Overview

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.

We offer the following connected products:

- Smartphones

- Smart watches
- Tablets
- Smart earphones

The functions of these connected products, as well as details regarding the data they generate and how it is handled, are described in the following sections of this notice.

3. Data Generated/Collected by Connected Products

[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
			[illegible]	[illegible]	[illegible]		
			[illegible]	[illegible]	[illegible]		
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			[illegible]	[illegible]	[illegible]		
[illegible]				[illegible]	[illegible]		
					[illegible]		

Data means any digital representation of acts, facts or information and any compilation of such acts, facts or information, including in the form of sound, visual or audio-visual recording.

For GDPR-compliant disclosures, please refer to Privacy Notice.

4. User Data Access, Erasure and Portability

Individuals or legal entities using our Connected Products hereinafter referred to as ("**Users**") have the right,in accordance with the EU Data Act,to request access to, erasure of, or portability of data generated/collected by Connected Products.
These requests can be submitted via [9. Contact and Data Request Channel]

5. Data Sharing and Compliance with Requests for Data

Data generated by our Connected Products may be shared with third parties under Articles 4 to 7 of the EU Data Act, applicable to the following requesters:

5.1 Business-to-Business (B2B) Access Requests

Exclusively based on the User's explicit consent;
Contracts shall specify: Purpose limitation, Confidentiality obligations, Data security measures, Prohibition of misuse.

5.2 Business-to-Government (B2G) Access Requests

Based on Article 14-18 of EU Data Act, data may be shared with public authorities:

Permitted under Article 15 for emergencies or legitimate public tasks (e.g., natural disasters, public safety, pandemics);

Data transmitted via encrypted secure channels with strict purpose binding;

Government entities must submit formal written requests with access logging;

Data minimisation principle applies to all shared datasets.

5.3 Third Parties Requests Submission

Third parties may submit formal requests through [9.Contact and Data Request Channel].

6. Data Security and Protection Mechanism

To ensure security of data generated by Connected Products manufactured by OPPO Guangdong Mobile Communications Co., Ltd.,we implement the following technical and organizational safeguards throughout the processes of data transmission, storage, and access:

- Implement full security encryption during storage and transmission to prevent data from unauthorised access, use or disclosure (such as by using SSL to encrypt many Services).
- Regularly review practices regarding data collection, storage and processing (including physical security measures) to prevent unauthorised access to or tampering with our various systems and data.

- Establish access rights management mechanism to authorize only necessary personnel to access data.
- Conduct security and privacy protection training, testing and other activities to enhance employee awareness of and proficiency in data protection.
- Use international and industry-recognised standards to protect your data and actively pursue relevant security and privacy protection accreditation.

7. Interoperability Notes

We ensure that the recipient can process the data in a structured, commonly used and machine-readable format in order to comply with the interoperability requirements of Articles 33 of the EU Data Act.

8. Data Use Restrictions and Prohibited Purposes

Without OPPO’s express written authorization or, unless legally required, data shall not be used for the following purposes:

-Development of competing products;

-Reverse engineering of algorithms;

-Targeted advertising or profiling of users.

Any breach of these restrictions may result in legal consequences ad revocation of access.

9. Contact and Data Request Channel

Service channel	Email

Poland	support.pl@OPPO.com
Romania	support.ro@OPPO.com
France	support.fr@OPPO.com
Italy	support.it@OPPO.com
Belgium	support.be@OPPO.com
Luxembourg	support.lu@OPPO.com
Netherlands	support.nl@OPPO.com
Portugal	support.pt@OPPO.com
Spain	support.es@OPPO.com
Germany	support.de@OPPO.com
Ireland	support.ie@OPPO.com
Austria	support.at@OPPO.com
Czech Republic	support.cz@OPPO.com
Slovakia	support.sk@OPPO.com
Hungary	support.hu@OPPO.com
Greece	support.gr@OPPO.com
Croatia	support.hr@OPPO.com

10. Policy Updates

This policy will be updated regularly based on legal requirements and business needs. All updates will be announced through our official website and related channels.