

OPPO EU Data Act Notice

Version: v1.0

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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

Data Name	Data Description	Data Source	Data Format	Estimated Volume	Continuous Real-time Generation	Storage Location	Storage Duration
Barometric Pressure	Current barometric pressure	Watch/Wristband	float	2KB/s	Yes	Not stored	Not stored
Rotation Angle	Crown rotation angle	Watch/Wristband	int	240B/s	Yes	Not stored	Not stored
Touchscreen	Touchscreen x/y coordinates	Watch/Wristband	int	2KB/s	Yes	Not stored	Not stored
Voltage	Battery voltage	Watch/Wristband	int	512B/s	Yes	Not stored	Not stored
	Charger voltage	Watch/Wristband	int	512B/s	Yes	Not stored	Not stored
Temperature	Battery temperature	Watch/Wristband	int	512B/s	Yes	Not stored	Not stored

	Device temperature in use	Smartphone/Tablet	int	5KB	yes	Not stored	Not stored
Status	Charging status	Watch/Wristband	int	512B/s	Yes	Not stored	Not stored
Type	Charger type	Watch/Wristband	int	512B/s	Yes	Not stored	Not stored
	Battery type	Watch/Wristband	int	512B/s	Yes	Not stored	Not stored
Current	Battery current	Watch/Wristband	int	512B/s	Yes	Not stored	Not stored
Gsensor	Angle, X/Y/Z axis coordinates	Watch/Wristband	float	2KB/s	Yes	Not stored	Not stored
	Motion direction, X/Y/Z axis coordinates	Smartphone/Tablet	float	64byte	Yes	Not stored	Not stored
Gyroscope	X/Y/Z axis coordinates	Watch/Wristband	float	2KB/s	Yes	Not stored	Not stored
	Rotation direction, X/Y/Z axis coordinates	Smartphone/Tablet	float	64byte	Yes	Not stored	Not stored
Msensor	Angle, X/Y/Z axis coordinates,	Watch/Wristband	float	2KB/s	Yes	Not stored	Not stored

	direction, sensitivity						
Light Intensity	Calibrated light intensity / Raw light intensity, Calibration coefficient, Gain, R_max/G_max/B_max/W_max, Row_coe	Watch/Wristband	float	512B	NO	Device-side	Until recalibration
LCD	Status: screen on/off, working mode, brightness	Watch/Wristband	int	2KB/S	Yes	Not stored	Not stored
Battery Life	Watch battery level value	Watch/Wristband	int	512B/h	Yes	Not stored	Not stored
Performance	Event processing time	Watch/Wristband	string	1k	No	Not stored	Not stored
Power Consumption	App power consumption details	Watch	string	50k	NO	Device-side	2 days
Switch Status	Auto OTA switch status, channel switching switch status, AI assistant continuous	Bluetooth Earbuds	SharePreferences	1KB	Yes	Device-side	Until actively cleared by user

	conversation switch status						
Golden Sound	Data generated by user using Golden Sound	Bluetooth Earbuds	Database	10KB	No	Device-side	Until actively cleared by user
Neck Health	Time period for neck health reminders, frequency	Bluetooth Earbuds	Database	1KB	Yes	Device-side	Until actively cleared by user
Device Type	Data length, stored 30-bit array	Bluetooth Earbuds	Binary Files	1KB	Yes	Device-side	Until actively cleared by user
Earbuds Exception Info	Earbuds crash, lag, BT&TWS connection status error, BT&TWS disconnection reason, earbuds rejection exception info, earbuds connection exception, battery info error, not fully charging/not charging info, hardware cancel/baseline /offset exception info	Bluetooth Earbuds	Binary Files	4KB	Yes	Device-side	Until actively cleared by user

Earbuds Status Info	Device dual connection info, lhdc usage count, touch self-learning data	Bluetooth Earbuds	Binary Files	2KB	Yes	Device-side	Until actively cleared by user
Geomagnetic Intensity	Geomagnetic intensity	Smartphone/Tablet	float	64byte	Yes	Not stored	Not stored
Step Count	Step count	Smartphone/Tablet	float	64byte	No	Not stored	Not stored
Fall Data	Fall data records	Smartphone/Tablet	float	64byte	No	Not stored	Not stored
Barometric pressure value (percentage value)	Barometric pressure value (percentage value)	Smartphone/Tablet	float	64byte	Yes	Not stored	Not stored
Connected Device Info	Network uplink rate; Network downlink rate; Connection rate; Signal strength	Smartphone/Tablet	int	12byte	Yes	Not stored	Not stored
	Network uplink rate; Network downlink rate; Connection rate; Signal strength		int	1byte	NO	Device-side	Until actively cleared by user

	"Bluetooth device address, Bluetooth device name, Hotspot name"		string	0~249byte	NO	Device-side	Until actively cleared by user
	MAC address, Name, Type, Color, Software version, Device usage time, Flag indicating whether it's the first connection	Bluetooth Earbuds	Database/SharedPreferences	5KB	Yes	Device-side	Until actively cleared by user
Battery Life & Battery Info	"Battery percentage, Battery health, Screen-on time since last charge, Usage time since last charge, Maximum battery capacity, Charging duration"	Smartphone/Tablet	int	1byte	Yes	Not stored	Not stored
	Battery mode	Smartphone/Tablet	string	10byte	Yes	Not stored	Not stored
	Fast charging solution	Smartphone/Tablet	string	16byte	Yes	Not stored	Not stored

Audio Settings Info	"Recording file format, Recording mode, Mute, Volume, Sound effects"	Smartphone/Tablet	string	16byte	NO	Device-side	Until actively cleared by user
Haptic Settings	Vibration intensity	Smartphone/Tablet	string	16byte	NO	Device-side	Until actively cleared by user
Display Info	"Screen brightness, Screen refresh rate, Touch sampling rate"	Smartphone/Tablet	int	2byte	Yes	Device-side	Until actively cleared by user
	Touch sampling rate	Smartphone/Tablet	int	2byte	Yes	Not stored	Not stored

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 and 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.