



CERTIFICATE

no. 377/21

ePrivacyseal GmbH
Große Bleichen 21, 20354 Hamburg, Germany

hereby certifies* that

as determined in the certification decision of 20 October 2021

Aspiegel SE
1F, Simmonscourt House, Ballsbridge, Dublin, D04 W9H6, Ireland
as a controller in the sense of art. 4(7) GDPR

operates its product or service

„HiVoice / Celia / Harmony“

version 31/05/2021

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

in conformity with the criteria catalogue of ePrivacyseal GmbH, version 2.1. of May 2018.

final audit day: 11/10/2021

next planned monitoring by 19/10/2023

period of validity: 20/10/2021 – 19/10/2023

Annex 1 to certificate no. 377/21

Definition of processing activities

Celia is a system level service of Harmony on Huawei Smartphones. To use Celia users have to use their voice in order to initiate commands. There are On-Device actions like managing device settings, making phone calls or open apps as well as actions which require third parties in order to fulfill the users request. At the time of this evaluation the following actions which require third parties are available: translation, weather and news. Additionally, the improvement program which uses statistical data of Celia usage can be enabled by the users consent. A user can at every time withdraw its consent as well as disable Celia completely in the device settings.

Annex 2 to certificate no. 377/21

Excluded processing activities

The following functions and/or services and/or product-versions are not subject to this evaluation and have not been reviewed by the experts:

1. Celia as it is provided to users outside the EU/EEA.
2. The usage of personal data by Aspiegel or any of their affiliates or 3rd parties for purposes like - but not restricted to:
 - any BI application or AI learning
 - Analytics and development purposes, including creating aggregated groups based on usage activities
 - Targeting and directed marketing activities
 - customer relationship management and customer care
 - support and communication
 - conducting customer surveys and customer complaint handling
 - maintenance, problem diagnosis and fixing
 - software and system updates
 - user identification

This includes also any back-end services and processes which relate to the a.m. operations.

3. Third-Party apps that may interact with Celia.
4. The usage of the EU-version of Celia outside of the EU.
5. Examination of TOMs of any processor or controller apart from Aspiegel data center.
6. Third Party services and translation / search engines like Bing, Yandex.
7. Any third parties or partners not listed under "third parties" having access to voice or other user data.