



## **CERTIFICATE**

**no. 410/22**

ePrivacyseal GmbH  
Große Bleichen 21, 20354 Hamburg, Germany

hereby certifies\* that

as determined in the certification decision of 29 September 2022

**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

**„AppGallery“**  
version 12.2.2.303

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 3.0 of May 2022.

final audit day: 26/09/2022

next planned monitoring by 02/07/2024

period of validity: 03/07/2022 – 02/07/2024

## **Annex 1 to certificate no. 410/22**

### **Definition of processing activities**

AppGallery serves as the App Store for Huawei devices. AppGallery is crawling several sources to obtain apks which then can and will be distributed in AppGallery itself. Developer / Publisher can use AppGallery Connect to distribute their apps on AppGallery and make them available for Huawei device users.

Aspiegel Limited offers a variety of mobile services to their customers. AppGallery is an app, which allows users to browse, install and update apps available for Huawei devices. The scope of this evaluation is limited to the version of AppGallery as it is provided by Aspiegel to users in the European Union (EU)/European Economic Area (EEA).

The following functions are subject to this evaluation:

#### **1. Agreement Data Flow**

Obtaining the user's consent

#### **2. Browse Download Install Update**

Using AppGallery to browse, download, install and update apps

#### **3. App Search**

Searching for available apps in AppGallery

#### **4. Pre-order app**

Apps which will be available in the near future can be pre-ordered

#### **5. Paid per download**

Purchase apps or additional app content

#### **6. Wishlist**

Saving apps which are not available yet

#### **7. App comment**

Rating and commenting on installed apps

#### **8. Activity and Gift Feature**

Users can participate in activities and win several gifts

#### **9. App promotion**

Display promoted apps to users

#### **10. Data Push to BI Flow**

## **Annex 2 to certificate no. 410/22**

### **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. AppGallery 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 AppGallery or any other Huawei services or third party services or service providers connected or associated with or using AppGallery.
4. The usage of the EU/EEA-version of AppGallery outside of the EU/EEA
5. Examination of TOMs of any processor or controller apart from Aspiegel
6. Payment process itself including payment/bank details.
7. Any processing of personal data that is not end user data such as employee's or contractors data