

# Ulefone EU Data Act Notice

Version: v1.0

Effective Date: 2025-11-04

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:** Shenzhen Gotron Electronic Co., LTD.(“Ulefone”, hereinafter referred to as “**We**” or “**Us**”).

**Registered Address:** 7B01, Building A, Block 1, Anhongji Tianyao Plaza, Longhua District, Shenzhen City

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

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
Touchscreen	Touchscreen x/y coordinates	Smartphone	int	2KB/s	Yes	Not stored	Not stored
Voltage	Battery voltage	Smartphone	int	512B/s	Yes	Not stored	Not stored
	Charger voltage	Smartphone	int	512B/s	Yes	Not stored	Not stored
Temperature	Battery temperature	Smartphone	int	512B/s	Yes	Not stored	Not stored
	Device temperature in use	Smartphone	int	5KB	Yes	Not stored	Not stored
Status	Charging status	Smartphone	int	512B/s	Yes	Not stored	Not stored
Current	Battery current	Smartphone	int	512B/s	Yes	Not stored	Not stored
G-sensor	Angle, X/Y/Z axis coordinates	Smartphone	float	2KB/s	Yes	Not stored	Not stored
	Motion direction, X/Y/Z axis coordinates	Smartphone	float	64byte	Yes	Not stored	Not stored
Gyroscope	X/Y/Z axis coordinates	Smartphone	float	2KB/s	Yes	Not stored	Not stored
	Rotation direction, X/Y/Z axis coordinates	Smartphone	float	64byte	Yes	Not stored	Not stored
M-sens	Angle, X/Y/Z axis	Smartphone	float	2KB/s	Yes	Not	Not

or	coordinates, direction, sensitivity	hone				stored	stored
Light Intensity	Calibrated light intensity / Raw light intensity, Calibration coefficient, Gain, R_max/G_max/B_max/W_max, Row_coe	Smartphone	float	512B	NO	Device-side	Until recalibration
LCD	Status: screen on/off, working mode, brightness	Smartphone	int	2KB/S	Yes	Not stored	Not stored
Battery Life	battery level value	Smartphone	int	512B/h	Yes	Not stored	Not stored
Performance	Event processing time	Smartphone	string	1k	NO	Not stored	Not stored
Power Consumption	App power consumption details	Smartphone	string	50k	NO	Device-side	2 days
Geomagnetic Intensity	Geomagnetic intensity	Smartphone	float	64byte	Yes	Not stored	Not stored
Step Count	Step count	Smartphone	float	64byte	NO	Not stored	Not stored
Barometric pressure value (percentage value)	Barometric pressure value (percentage value)	Smartphone	float	64byte	Yes	Not stored	Not stored
Connected Device Info	Network uplink rate; Network downlink rate; Connection rate; Signal strength	Smartphone	int	12byte	Yes	Not stored	Not stored
	Network uplink rate; Network downlink rate; Connection rate; Signal strength	Smartphone	int	1byte	NO	Device-side	Until actively cleared by user

	"Bluetooth device address, Bluetooth device name, Hotspot name"	Smartphone	string	0~249 byte	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	Smartphone	Database/Share Preferences	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	int	1byte	Yes	Not stored	Not stored
	Battery mode	Smartphone	string	10byte	Yes	Not stored	Not stored
Audio Settings Info	"Recording file format, Recording mode, Mute, Volume, Sound effects"	Smartphone	string	16byte	NO	Device-side	Until actively cleared by user
Haptic Settings	Vibration intensity	Smartphone	string	16byte	NO	Device-side	Until actively cleared by user
Display Info	"Screen brightness, Screen refresh rate, Touch sampling rate"	Smartphone	int	2byte	Yes	Device-side	Until actively cleared by user
	Touch sampling rate	Smartphone	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 Shenzhen Gotron Electronic 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 Ulefone'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: <a href="mailto:service@ulefone.com">service@ulefone.com</a>
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## **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.