

## Statement About HUAWEI Developers and Privacy

Last modified: June 28, 2021

HUAWEI Developers provides a range of services and resources for you to develop, distribute, and promote your apps, games, and themes (hereinafter referred to as "Products") throughout their lifecycles within the ecosystem of HUAWEI Developers.

When you register your HUAWEI ID account, your contracting entity and data controller will be determined based on the country or region where you register your account.

If you register your HUAWEI ID account in the Chinese mainland listed in [Part I of Exhibit A – List of Countries/Regions](#) (hereinafter, "Exhibit A"), Huawei Software Technologies Co., Ltd. (hereinafter, "Huawei Software"), a Huawei subsidiary incorporated in the People's Republic of China, will serve as your contracting entity and data controller.

If you register your HUAWEI ID account in a country or region listed in [Part II of Exhibit A](#), Aspiegel SE (hereinafter, "Aspiegel"), a Huawei subsidiary incorporated in Ireland, will serve as your contracting entity and data controller.

If you register in a country or region listed in [Part III of Exhibit A](#), Huawei Services (Hong Kong) Co., Limited. (hereinafter, "Huawei Hong Kong"), a Huawei subsidiary incorporated in Hong Kong (China) will serve as your contracting entity and data controller.

Additionally, Huawei Software, Aspiegel, or Huawei Hong Kong may independently act as your contracting entity and data controller based on the distribution area of each of your Products in accordance with [Parts I to III of Exhibit A](#), depending on the services used by you.

This Statement covers the following topics:

1. [What data do we collect about you?](#)
2. [How do we use your data?](#)
3. [How long do we store your data?](#)

4. [Do we share your data?](#)
5. [What are your rights and choices?](#)
6. [How do you contact us?](#)
7. [How do we update this statement?](#)

## **1 What data do we collect about you?**

As part of the HUAWEI Developers services, we will only collect and use your personal data for the purposes stated in this statement. The "personal data" herein refers to any information that enables us to identify you as a user of the HUAWEI Developers services.

For these purposes, we collect and process the following data:

If you are an individual developer:

- Identification information, such as legal name, identification document(s) (copy of your valid ID, such as passport, national identity card, or driver's license, and copy of your bank card), developer name/nickname, portrait uploaded by you, street address, city, country, phone number, and email address;
- Financial information, such as bank name, the name and number of the bank branch, IBAN, SWIFT code (BIC), account name, account type, K/C, tax payer ID, VAT number, tax address, tax qualification file, account number, currency type, bank country, and bank information confirmation letter;
- Product management information, such as developer name, developer user ID, developer registration account (HUAWEI ID account identifier), developer type, country ID, contact information (phone number and email address), testing account(s), product package, and related technical information such as signature key, product comments, and feedback;
- Service usage information, such as information relating to the services used by you, such as your use of our APIs and other services, and your participation in events, programs, competitions, and other activities organized by us;
- Customer service and partner management information, such as our communications with you, your responses to questionnaire, feedback, and other related information;

- Network and usage information, such as IP address, language, webpage location and title, webpage request type, click events and other browsing information, brief information about problems encountered during usage, problem descriptions and attachments, and cookie data. Learn [more](#) about how we use cookies.

If you are an employee or a representative of an enterprise developer:

- Identification information, such as the contact person's name, job title, work phone number, and work email address;

- Product management information, such as developer user ID, developer registration account (HUAWEI ID account identifier), contact information (phone number and email address), and testing account(s);

- Service usage information, such as information relating to your participation in events, programs, competitions, and other activities organized by us.

- Network and usage information, such as IP address, language, webpage location and title, webpage request type, click events and other browsing information, brief information about problems encountered during usage, problem descriptions and attachments, and cookie data. Learn [more](#) about how we use cookies.

If you are a member of a developer's team account, the following additional data is collected and processed:

- Account information, such as your HUAWEI ID account name, avatar uploaded by you, and email address;

- Service usage information, such as service use and issues or questions that you submit;

- Network information, such as your IP address; and

- Information related to your team account, such as your role and the rights granted to you by the team admin.

If you are using the remote device testing function, the following data is collected and processed:

- All testing data of your app that you have installed on the remote virtual or physical devices hosted by us.

If you are using the Developers app, the following data is collected and processed as well:

- App usage information, such as the HUAWEI ID that you sign in with, device information, and usage activity (including your posts on the Developer Forum).

**If you are using the training service, the following data is collected and processed additionally:**

- Course and training material study history, examination results, and course certificates.

## **2 How do we use your data?**

To provide you with the HUAWEI Developers services and fulfill contractual obligations, we will use and process your personal data so that you can distribute, manage, and monitor your apps within our ecosystem, and use other HUAWEI Developers services, such as SDKs, APIs, Kits, and testing platforms. This requires us to process your data for registration and verification, accounting and billing, promotion, partner relationship management, support and communication, software and system updates, service usage management, contract management, team management, and remote device testing. We will also process your personal data in order to diagnose and resolve various problems. If you are a user of a team account, we also process personal data related to your team and your role, in order to provide you with the team account functions. If you are using third-party services to access the AppGallery Connect services, we may disclose your contact information (such as email address, phone number, name, and team list) to the third-party service provider based on your separate authorization. We may also receive personal data about you from these third-party service providers when you use their services to connect with the AppGallery Connect services.

In addition, we use your personal data for the following purposes based on the contracting entity's legitimate interests (if your Products are distributed in the country (ies) or region(s) listed in [Part II of Exhibit A](#)), or on the basis of your consent (if your Products are distributed in the country(ies) or region(s) listed in [Part III of Exhibit A](#)):

- Analytics and development purposes: This enables us to understand our users' needs from their perspective, and to improve the quality and user experience of our current and future services and offerings. You can object to such processing, as detailed in [Section 5.5](#) below.

- Promotion and marketing purposes: This enables us to communicate with you about our offerings and create aggregated marketing targets. Knowing users' preferences allows us to target our offers and offer products and services that better cater to the needs and desires of our users. You can object to such processing, as detailed in [Section 5.5](#) below.

- Information security purposes: This enables us to detect or prevent various types of misuse of services and frauds, in order to provide you with secure and reliable services.

We may send you emails to inform you of new and/or enhanced functions or features available to developers on the website, provided that you have given consent to such communications during registration on the HUAWEI Developers website. You can withdraw such consent at any time, as detailed in [Section 5.5](#) below.

We also process your financial and identification information for tax and accounting purposes, as required by applicable laws and regulations.

### **3 How long do we store your data?**

We retain your personal data for no longer than is necessary for the purposes defined in this statement.

We will process and retain your data for the duration of the customer relationship. When you delete your HUAWEI ID account, any and all personal data related to your account and associated services, such as HUAWEI Developers services, will be erased. However, we retain:

- Your financial and identification information for seven (7) years from the day when you delete your HUAWEI ID account, for contract and partnership management purposes;

- Your payment and settlement information for seven (7) years from the day when the transaction was made, for accounting purposes;

- Personal data processed for customer relationship management, such as data subject requests, complaints, and customer interaction records, for up to five (5) years from the last interaction;

- Personal data processed for contract management purposes, for up to three (3) years after your HUAWEI ID account has been deleted;

- Personal data processed in relation to your participation in competitions, events, programs, and other activities organized by us for up to two (2) years, or as otherwise communicated in connection with the registration for such an activity;
- Personal data that is used for analytics and development purposes, for up to twelve (12) months from the date of data collection, unless you have objected to such processing;
- Your identification document(s) (copy of passport or identity card and bank card) as an individual developer and business license as an enterprise developer, which will be removed after your Developer Account has been deleted;
- Backups and app logs, which are processed to ensure the security of your data and services, for up to six (6) months from the day when they were captured.

Once the retention period expires, we will delete or anonymize your personal data, unless otherwise required by applicable laws and regulations.

## **4 Do we share your data?**

### **4.1 Data storage location**

If you are an individual developer and located in:

- (i) a country/region listed in Part II of Exhibit A, your data will be stored in data centers located in the EU/EEA, unless otherwise stated below; or
- (ii) a country/region listed in Part III of Exhibit A, your data will be stored in data centers located in Singapore and can be accessed for maintenance from China or India.

Notwithstanding Clause 4.1(ii) herein, if you are an individual developer and located in Russia, your data will be stored in data centers located in the Russian Federation.

If you are an enterprise developer, your data will be stored in data centers located in China. However, the storage location will change:

- (i) to Russia (unless otherwise stated below) from the end of October 2020 onwards for enterprise developers who are located in the Russian Federation;

(ii) to the EU/EEA (unless otherwise stated below) from the end of October 2020 onwards for enterprise developers who are located in a country/region listed in Part II of Exhibit A; or

(iii) to Singapore (unless otherwise stated below) from the end of October 2020 onwards for enterprise developers who are located in a country/region listed in Part III of Exhibit A.

However, if you use the team account functions, your team member list, which includes information about your HUAWEI ID and your role in the team, will be stored in data centers located in China. Additionally, limited data relating to your API usage and quota may also be stored in other regions (the EU/EEA, China, Russia, or Singapore) to enable use of the APIs in such regions. In addition, the data collected when you are using the AppGallery Connect Interaction Center as well as the data for partner relationship management will be stored in China. The data centers are operated by our contracted suppliers that work on our behalf.

## 4.2 Data sharing

Our business operations, such as marketing, surveys, sales promotion and business development, as well as customer support, may require our contracted suppliers acting on our behalf as data processors and located outside the EU/EEA and/or the Russian Federation to process your personal data.

For partnership management purposes, we will transfer your contact information, job title, gender, and information related to different activities to a Huawei Group company in China that operates under contract and acts on our behalf.

For verification, partner management, product management, and accounting purposes, we will transmit your contact information, product information, service usage information, and financial information to a Huawei Group company in China that operates under contract and acts on our behalf.

For customer support and troubleshooting purposes, we will transmit your contact information, diagnostics information, problem description, and attachments to a Huawei Group company in China that operates under contract and acts on our behalf.

For enabling use of our APIs outside of your registration country/region and managing the agreed API usage quotas, your API usage data and available quota may also be shared to Huawei Group companies in countries/regions outside of your registration country/region.

If you use the team account functions, your personal data related to the team account may be shared with the admin of your team, as well as other team members, depending on the rights they have been granted by the team admin. Further, to enable you to access our services globally, your account and product information may be shared across the sites operated by the Huawei group companies in EU, China, Singapore, or Russia.

We may also share your data:

- When required in response to a legal process or request from a competent authority, in accordance with an applicable law, or in connection with a legal proceeding or process; or
- When required as part of a merger, acquisition, sale of assets (such as service agreements), or transition of services to a Huawei Group entity or other company.

When you distribute your Products in the Chinese mainland, we will disclose your identification, financial, and product management information with your contracting entity in China (i.e., Huawei Software Technologies Co., Ltd.).

In addition, as described above your personal data may be transferred, processed, and stored outside of your country/region of residence and therefore it may be available to government authorities under lawful orders and laws applicable also in those countries /regions.

If you select a distribution area that is different than the country or region where you register your HUAWEI ID account, we will disclose your identification information (such as name) to the Huawei Group company managing the selected distribution area for the purposes of enabling the distribution. In this case, your data may be transferred to and stored in either Germany, Russia, Singapore or China, depending on the distribution area selected by you.

#### 4.3 Safeguards used in data transfers

If your products are distributed in the country(ies) or region(s) listed in [Part II of Exhibit A](#), when we transfer or disclose your HUAWEI Developers data outside the EU /EEA, where local laws may not provide the same level of data protection, we comply with applicable legal requirements for providing adequate safeguards by incorporating the EU Commission [standard data protection clauses](#) into such transfers or disclosures. If you want to obtain copies of the actual signed standard data protection clauses, please [contact us](#).

We respect Hong Kong (China) Personal Data (Privacy) Ordinance and, if your Products are distributed in the country(ies) or region(s) listed in [Part III of Exhibit A](#), we are committed to complying with the Hong Kong (China) Personal Data (Privacy) Ordinance requirements when we transfer personal data outside of Hong Kong (China).

## 5 What are your rights and choices?

You have the following rights and choices:

### 5.1 Access your data

To request a copy and a description of your personal data that we have collected and stored in relation to HUAWEI Developers, access the [HUAWEI Developers portal](#) from your computer. Click **Log in** and log in to HUAWEI Developers portal with your HUAWEI ID. Go to **Settings > HUAWEI ID > Privacy Center > Request your data**.

For additional access requests, please [contact us](#).

### 5.2 Rectify your data

To keep your data up-to-date and accurate, access and modify your data by accessing the [HUAWEI Developers portal](#).

### 5.3 Port your data

To port the personal data that you have provided to us in relation to HUAWEI Developers in a commonly-used and machine readable format, access the [HUAWEI Developers portal](#) from your computer. Click **Log in** and log in to HUAWEI Developers portal with your HUAWEI ID. Go to **Settings > HUAWEI ID > Privacy Center > Request your data**.

For your product package, please [contact us](#).

### 5.4 Erase your data

You may at any time:

- Delete your HUAWEI ID. As a result, your personal data will be erased. If you have Products, then you will need to delete the Products from your Developer Account before

deleting your HUAWEI ID in order for all your personal data stored within the HUAWEI Developers services to be deleted. [Contact us](#) if you have any difficulty removing your information.

- Object to the processing of your personal data, as detailed in [Section 5.5](#). As a result, we will erase the data within the scope of a valid objection if we no longer have legal basis to continue such processing.

- [Contact us](#) if you think the processing of your personal data is unlawful, and that your data should be erased.

We will erase or anonymize your personal data within a reasonable period of time, based on your aforementioned actions, and in accordance with the retention periods as described in [Section 3](#).

### 5.5 Withdraw your consent

If you opted to receive electronic direct marketing from us, you can withdraw your consent by going to **Console > Settings > Profile** and unchecking **I agree to receive promotional offers from HUAWEI Developers**. After doing so, you will no longer receive promotional offers from HUAWEI Developers.

### 5.6 Object processing

If you want to object to the processing of your data for analytics, please [contact us](#).

When making a request, please specify the scope of the request, and provide us with the email address or phone number that you use to log in to your HUAWEI ID.

We will contact you to verify your identity, in order to proceed with your request.

### 5.7 Restrict processing

If you want to restrict the processing of your personal data, please [contact us](#). You have the right to restrict the processing of your data under the following circumstances:

- Your data is unlawfully processed, but you do not want to erase it;
- You have a legal claim that you need to establish, exercise, or defend, and you requested us to keep your data when we would not otherwise keep it;
- Your request for objection is pending our verification process; or

- You have contested the accuracy of your personal data, and the accuracy of your data is pending our verification process;

When submitting your request, please specify the scope and basis of the request, and provide us with the email address or phone number that you use to log in to your HUAWEI ID.

We will contact you to verify your identity, in order to proceed with your request.

## **6 How do you contact us?**

You can find information about how to exercise your data subject's rights in [Section 5](#). If you have any questions about your rights as a data subject, or how we process your personal data, or if you would like to contact our Data Protection Officer, please [contact us](#).

For product distributions in the country(ies) or region(s) listed in [Part I of Exhibit A](#), your contracting entity and data controller will be Huawei Software Technologies Co., Ltd. (No. 101, Software Road, Yuhuatai District, Nanjing P. R. China).

For product distributions in the country(ies) or region(s) listed in [Part II of Exhibit A](#), your contracting entity and data controller will be Aspiegel SE. (1F, Simmons court House, Ballsbridge, Dublin, D04 W9H6 Ireland. Registration number 561134).

For product distributions in the country(ies) or region(s) listed in [Part III of Exhibit A](#), your contracting entity and data controller will be Huawei Services (Hong Kong) Co., Limited. (Room 03, 9/F, Tower 6, The Gateway, No.9 Canton Road, Tsim Sha Tsui, Kowloon, Hong Kong, P.R. China).

If you believe that we are not processing your personal data in accordance with this statement or the applicable data protection laws, you can lodge a complaint with your data protection authority, or the Data Protection Commissioner in Ireland.

## **7 How do we update this statement?**

We recommend that you regularly check for the latest version of this statement from the HUAWEI Developers portal settings, as we may update it from time to time. In the event

of any material changes to this statement, we will notify you in advance by means of notification dialogs, push messages, emails, and other methods, depending on the nature of the change.

## **Exhibit A – List of Countries/Regions**

No.	Countries/Regions.
Part I	Chinese mainland.
Part II	Aland Islands, Albania, Andorra, Australia, Austria, Belgium, Bonaire, Bosnia and Herzegovina, Bulgaria, Canada, Croatia, Curacao, Cyprus, Czech Republic, Denmark, Dutch Caribbean, Estonia, Faroe Islands, Finland, France, Germany, Gibraltar, Greece, Greenland, Guernsey, Hungary, Iceland, Isle of Man, Israel, Italy, Jersey, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Moldova, Monaco, Montenegro, Netherlands, New Zealand, North Macedonia, Norway, Poland, Portugal, Ireland, Romania, Saba, Saint Vincent and the Grenadines, San Marino, Serbia, Sint Eustatius, Sint Maarten, Slovakia, Slovenia, Spain, St. Martin, St. Pierre and Miquelon (France), Sweden, Switzerland, Turkey, Ukraine, United Kingdom, United States, Vatican City;
Part III	Other countries and regions.