

Fairphone's Connected Products & Related Services Data Disclosure Statement

Your Fairphone, Fairbuds and the related applications generate non-personal data, known as product and service data, to optimize their functioning. In this document, we are providing you with information about your devices and applications' data generation, use and storage capabilities, in accordance with the Data Act (Regulation (EU) 2023/2854). The information in this document is only applicable to product data and service data. For more information about Fairphone's treatment of personal data, please consult our [Privacy Policy](#).

A **"connected product"** is an item that obtains, generates or collects data concerning its use or environment, and that is technically able to communicate this data, without product data storage, processing or transmission being the item's primary function. A **"related service"** is a digital service which is connected with the product at the time of purchase or that is later connected to the product to add, update or adapt the functions of the connected product. For Fairphone, the following classification applies:

Fairphone's Products & Services	
Connected Products	Related Services
Smartphones (Fairphone 5, Fairphone 6), Audio Products (Fairbuds, Fairbuds XL)	MyFairphone App, Fairbuds App, Fairphone Moments, Fairphone Activation Logger

In Annex 1, you will find more information about (1) the type, format, and estimated volume of data the products or services can generate, (2) whether this data is generated continuously and in real-time, (3) the storage of this data, and (4) how to access this data.

Unless specified otherwise, the data holder for product and service data is FairPhone B.V., Van Diemenstraat 200, 1013 CP Amsterdam, Netherlands, registered under number 55901964 ("**Fairphone**"). You can contact us in relation to this statement, including for data sharing requests, by sending an email to: product.compliance@fairphone.com.

If you believe your rights under Chapter II of the Data Act have been infringed, you may lodge a complaint with the Dutch Data Authority (*Autoriteit Persoonsgegevens*) or with the competent authority in your EU Member States.

Some datasets may contain trade secrets of Fairphone or its suppliers (e.g., proprietary diagnostic parameters). Where the trade secret holder is not Fairphone, this will be indicated in the relevant dataset description along with the holder's identity.

The data access arrangements under this statement remain in effect for the duration of your ownership, lease, or rental of the connected product or subscription to the related service. You may terminate these arrangements at any time by ceasing use of the product/service and requesting deletion of your stored data.

ANNEX 1: FAIRPHONE PRODUCTS & SERVICES DATA

1. Smartphones (Fairphone 5, The Fairphone (Gen. 6))

The information provided below is indicative and based on the stock version of the products. The estimated volume, data generation and data storage information found in the table below may vary depending on the user's installed application and permissions given to applications.

Data Category	Data Type	Data Source	Format	Estimated Volume	Real-time Generation	Storage Location	Storage Duration
Accelerometer	X, Y, Z linear acceleration (m/s ²)	Smartphone	float	64 B	Yes	Not stored	Not stored
Gyroscope	Angular velocity around X, Y, Z (rad/s)	Smartphone	float	64 B	Yes	Not stored	Not stored
Magnetometer	Magnetic-field vectors X, Y, Z (μT)	Smartphone	int	64 B	No	Not stored	Not stored
Proximity sensor	Near/far binary state (0/1)	Smartphone	float	1 B	Yes	Not stored	Not stored
Ambient light sensor	Illuminance level (lux)	Smartphone	float	4 B	Yes	Not stored	Not stored
Barometer	Atmospheric pressure (hPa) & altitude estimate (m)	Smartphone	int	8 B	No	Not stored	Not stored
Hall switch	Magnetic-field presence (open/close 0/1)	Smartphone	int	1 B	Yes	Not stored	Not stored
Step counter	Step count, activity class (walk/run/still)	Smartphone	int	8 B	Yes	Not stored	Not stored
GNSS-derived coordinates	Latitude, longitude, altitude, speed (m/s)	Smartphone	float	128 B	Yes	Not stored	Not stored
Cell tower-based location	Cell ID, MCC, MNC, signal strength (dBm)	Smartphone	string	128 B	Yes	Device-side	Until next reboot
Wi-Fi positioning	SSID, BSSID, RSSI (dBm), frequency band	Smartphone	string	128 B	Yes	Not stored	Not stored
BLE-based indoor location	Beacon UUID, signal strength (RSSI), proximity zone	Smartphone	string	128 B	Yes	Not stored	Not stored
E-compass	Azimuth (°), pitch (°), roll (°)	Smartphone	float	32 B	Yes	Not stored	Not stored

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GPS	Raw NMEA sentences, satellite count, HDOP	Smartphone	string	256 B	Yes	Not stored	Not stored
Fingerprint match scores	Match score (0-100), template ID, retry count	Smartphone	float/int	32 B	No	Device-side	Until actively cleared by user
Face recognition match scores	Match score (0-100), face ID, liveness flag	Smartphone	float	20 MB	No	Device-side	Until actively cleared by user
Sensor usage logs & error records	Sensor ID, usage count, error code, timestamp	Smartphone	String	0	No	Not stored	Not stored
Authentication history	Auth method, success/fail flag, timestamp, failure reason	Smartphone	String	0	No	Not stored	Not stored
Image Sensor	ISO, shutter, HDR settings	Smartphone	String	1 KB	No	Not stored	Not stored
OIS/EIS Logs	Optical/Electronic Image Stabilization	Smartphone	String	1 KB	No	Not stored	Not stored
Depth/ToF Frames	Depth and Time-of-Flight data	Smartphone	Float	1 KB	No	Not stored	Not stored
Microphone raw PCM (if analyzed)	16-bit/24-bit PCM samples, sample-rate, amplitude arrays	Smartphone	float	32 B	Yes	Not stored	Not stored
Speaker EQ/tuning profiles	EQ band gains, filter coefficients, preset ID, profile hash	Smartphone	string	1 KB	No	Device-side	log-stm storage Dir: /vendor/etc/acdbdata
Audio latency & beamforming logs	Round-trip latency (ms), mic-array weights, steering angle	Smartphone	string	256 B	Yes	Not stored	Not stored
Voice-assistant invocation logs	Wake-word ID, timestamp, confidence score, session result	Smartphone	string	256 B	Yes	Not stored	Not stored
Ambient noise level classification	Noise class, dB SPL estimate, timestamp	Smartphone	int/float	256 B	Yes	Not stored	Not stored
Touch position/velocity/pressure	X,Y coordinates, velocity vectors (px/s), pressure (g)	Smartphone	float	256 B	Yes	Not stored	Not stored
Brightness adjustment history	Timestamp, new brightness %, trigger source (auto/manual)	Smartphone	string	256 B	No	Not stored	Not stored
Display rendering parameters	Color profile ID, refresh rate (Hz), gamma curve index	Smartphone	string	256 B	No	Not stored	Not stored
Touch diagnostics	Touch event counts, error flags, calibration offsets	Smartphone	int/float	256 B	Yes	Not stored	Not stored

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Battery telemetry	Charge cycles (int), temperature (°C), capacity (mAh)	Smartphone	int/float	256 B	Yes	Not stored	Not stored
Charging curve	Voltage (V) vs. current (mA) time-series	Smartphone	float	256 B	Yes	Not stored	Not stored
USB/PD negotiation logs	PD revision, power contract (W), cable ID, error codes	Smartphone	string	1 KB	Yes	Not stored	Not stored
Thermal throttling events	Timestamp, component, throttle duration (ms), temp (°C)	Smartphone	string	1 KB	Yes	Not stored	Not stored
Per-component power draw	CPU, GPU, RF, display mA or mW usage over time	Smartphone	float	1 KB	Yes	Not stored	Not stored
Cellular logs	Band, RAT, RSSI/RSRP, VoLTE flag	Smartphone	string	1 KB	Yes	Device-side	Until next reboot
Wi-Fi logs	SSID, RSSI, auth type, disconnect reason	Smartphone	string	1 KB	Yes	Device-side	Until user manual remove
Bluetooth logs	Connection state, MAC, profile ID, error code	Smartphone	string	1 KB	Yes	Not stored	Not stored
NFC transactions (metadata)	Transaction ID, service type, status, timestamp (metadata)	Smartphone	string	1 KB	No	Not stored	Not stored
eSIM provisioning & OTA logs	ICCID, profile version, OTA result, timestamp	Smartphone	string	1 KB	No	Device-side	Until next reboot
Crash logs	Tombstone stack trace, panic reason, CPU registers	Smartphone	string	10 MB	No	Device-side	Until actively cleared by user
System uptime/boot logs	Boot timestamp, uptime (s), boot reason, bootloader ver	Smartphone	string	1 KB	Yes	Device Internal Storage	Until next reboot
Thermal events	Component, temperature (°C), throttle level, timestamp	Smartphone	string	128 B	Yes	Device Internal Storage	Short-term with log rotation
Hardware watchdog resets	Reset reason, watchdog ID, last heartbeat, timestamp	Smartphone	string	128 B	No	Device Internal Storage	Until next reboot
App usage duration & state	Package name, foreground time (ms), top-activity flag	Smartphone	string	10 MB	No	Device-side	Until actively cleared by user
Notification interaction logs	Package, action (tap/dismiss), timestamp	Smartphone	string	0 B	No	Not stored	Not stored

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Install/uninstall history	Package name, version code, action, timestamp	Smartphone	string	0 B	No	Not stored	Not stored
Default app settings	Intent category, default package, timestamp	Smartphone	string	1 KB	No	Device-side	Until actively cleared by user
Digital wellbeing metrics	Screen-time (ms), app category, unlock count, timestamp	Smartphone	string	256 B	No	Device-side	Until actively cleared by user
Earbuds/BT device connection	MAC address, profile (A2DP/HFP), connect/disconnect flag	Smartphone	string	256 B	Yes	Device-side	Until actively cleared by user
Accessory battery/firmware info	Battery % (int), firmware version, accessory model ID	Smartphone	string	256 B	Yes	Not stored	Not stored
USB accessory logs	VID/PID, USB class, connect event, power draw (mA)	Smartphone	string	256 B	Yes	Not stored	Not stored
Display casting events	Cast protocol (Miracast/Chromecast), session start/end	Smartphone	string	256 B	Yes	Not stored	Not stored
Input device usage logs	Device type (keyboard/mouse), usage duration (ms), PID	Smartphone	string	256 B	Yes	Not stored	Not stored
Backup metadata	Last backup epoch, total size (MB), file count	Smartphone	string	256 B	No	Google cloud	Until actively cleared by user
Sync status per service	Service ID, last sync epoch, success/error flag	Smartphone	string	256 B	No	Google cloud	Until actively cleared by user
Login/auth token usage	Token hash, scope, last refresh epoch, TTL (s)	Smartphone	string	256 B	No	Google cloud	Until actively cleared by user
Cloud storage usage	Provider ID, quota used (GB), quota total (GB)	Smartphone	string	256 B	No	Google cloud	Until actively cleared by user
Verified boot status	Boot state (green/yellow/orange/red), rollback index, key ID	Smartphone	int/string	256 B	No	Device Internal Storage (logs)/TEE Persistent	Persistent
Secure enclave operation logs	Command ID, result code, timestamp, elapsed cycles	Smartphone	string	256 B	Yes	Device Internal Storage (logs)	For the duration of the session
Key provisioning logs	Key alias, provisioning epoch, attestation verdict	Smartphone	string	256 B	No	TEE	Persistent
Security patch event logs	Patch level string, install epoch, reboot required flag	Smartphone	string	256 B	No	Device Internal Storage (Settings)	Persistent

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Permission usage history	Permission group, package, last access epoch	Smartphone	string	256 B	No	Device Internal Storage	Persistent/Until manually cleared/7 days
Remote diagnostic sessions	Session ID, start/end epoch, diagnostic commands, result	Smartphone	string	0 B	No	Not stored	Not stored
Repair/component replacement logs	Component SN, replacement epoch, technician ID, status flag	Smartphone	string	0 B	No	Not stored	Not stored
Remote wipe/lock logs	Command type (wipe/lock), timestamp, initiator ID, success	Smartphone	string	0 B	No	Not stored	Not stored
Root/jailbreak detection	Detection flag, method hash, timestamp, security verdict	Smartphone	int/string	0 B	No	Not stored	Not stored
Pairing history with other devices	Local device ID, remote device ID, pairing epoch, transport	Smartphone	string	0 B	No	Not stored	Not stored
Cross-device session continuity	Session token, app package, handoff epoch, continuity flag	Smartphone	string	0 B	No	Not stored	Not stored
Clipboard/content sync logs	Sync type (text/file), hash, source/dest device, timestamp	Smartphone	string	0 B	No	Not stored	Not stored
Companion device status logs	Device type, battery %, connection quality, last seen epoch	Smartphone	string	0 B	No	Not stored	Not stored

2. Audio Products (Fairbuds, Fairbuds XL)

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The information provided below is indicative and based on the stock version of the products. The estimated volume, data generation and data storage information found in the table below may vary depending on the user's installed application and permissions given to applications.

Data Category	Data Type	Data Source	Data Format	Estimated Volume	Data Generation	Storage Location	Data Storage
Pairing / Bonding records	Paired phone identifier(bond keys), connection history counters	Earbuds	binary	Each group consists of 6 bytes, with a maximum of 8 groups	N/A	Headphone	Short term
Connection events	Connect/disconnect timestamps, reason codes	Earbuds	string/int	N/A	N/A	N/A	N/A
Link quality metrics	RSSI, SNR, packet error rate (if applicable)	Earbuds	string/int	N/A	N/A	N/A	N/A
Codec negotiation info	Codec type(SBC/AAC/LC3, etc.), bitrate, sample rate	Earbuds	string/int	N/A	N/A	N/A	N/A
Playback control events	Play/pause/skip, volume changes via earbuds	Earbuds	string/int	N/A	N/A	N/A	N/A
ANC/Transparency mode state	Codec type (SBC/AAC/LC3 etc.), bitrate, sample rate	Earbuds	string/int	1 byte	N/A	Earbuds	Long-term storage
Equalizer profile	EQ preset / custom bands (if supported)	App / Earbuds	JSON / binary	6×32 byte	NO	Earbuds	Short term
Microphone status	Mic enabled/disabled, gain state (no audio content stored)	Earbuds	int	N/A	N/A	N/A	N/A
Voice assistant invocation events	Wake/press-to-talk trigger events (no speech content stored)	Earbuds / App	string/int	N/A	N/A	N/A	N/A
Touch/button actions	Single/double tap, long-press events, gesture mapping	Earbuds	string/int	N/A	N/A	N/A	N/A
Wear detection state	In-ear detection on/off, wear state changes (if sensor exists)	Earbuds	int	1 byte	N/A	N/A	N/A

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Battery level telemetry	L/R earbuds % + case % + charging state	Earbuds / Case	int	1 byte	Real-time monitoring while powered on	earbuds	Long-term storage
Battery health info	Charge cycles estimate, temperature range flags (if available)	Earbuds / Case	int/float	N/A	N/A	N/A	N/A
Charging events	Dock/undock timestamps, charge completed, errors	Case	string/int	N/A	N/A	N/A	N/A
Error logs	Error codes, module IDs, timestamps (no user content)	Earbuds / Case	string	N/A	N/A	N/A	N/A
Crash logs (if any)	Firmware crash reason, stack signature (if implemented)	Earbuds	binary/string	N/A	N/A	N/A	N/A
Manufacturing / calibration data	Mic/speaker calibration coefficients, sensor calibration	Earbuds	binary	4096 bytes	No	Earbuds	Long-term storage
OTA update history	Update timestamps, from/to version, status	App / Earbuds	string	N/A	N/A	N/A	N/A
Update package metadata	Package ID, checksum, size (no payload stored after install)	App / Earbuds	string	N/A	N/A	N/A	N/A
Find-my last seen info	"Last connected" timestamp; location is from phone, not earbuds	App	string/int	N/A	N/A	N/A	N/A
User privacy settings	Telemetry/diagnostics opt-in flags	App / Earbuds	int	N/A	N/A	N/A	N/A
Support ticket diagnostics bundle	User-exported logs (explicit action)	App		N/A	N/A	N/A	N/A

3. Related Services (MyFairphone App, Fairbuds App, Fairphone Moments, Fairphone Activation Logger)

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Data Category	Data Type	Data Format	Estimated Volume	Data Generation	Data Storage & Usage
Account and profile data	company info, login identifiers, device push ID, consent flags	String / integer / boolean	~0.5–1 KB	Event-driven (at sign-up, login, or setting changes)	Temporary (app memory until transmitted; then retained in backend) *
Device snapshot	model, color, RAM, storage, IMEIs, serial, OS build	String / integer	~0.5 KB	Event-driven (registration, diagnostics)	Temporary (app memory until transmitted; then retained in backend) *
Timeline events	goal changes, views, origin)	String / integer	~0.1 KB	Event-driven (when user views or edits longevity goal)	Temporary (app memory; uploaded immediately) *
Device health metrics	storage use, RAM use, battery temperature, uptime	Integer / float	~0.1 KB	Event-driven (when health check screen opened)	Volatile
Survey responses	NPS score, explanation, expected longevity, device milestone	String / integer	~0.25 KB	Event-driven (when survey submitted)	Temporary (until submission; stored in backend systems)
Google Analytics: default events	session_start, first_open, screen_view, user_engagement	String / integer / timestamp	~0.25 KB	Continuous during app use	Volatile (GA SDK until upload)
Google Analytics: custom events	create_mode, switch_on/off with mode details	String / integer / timestamp	~0.25 KB	Event-driven during feature use	Volatile (GA SDK until upload)
Fairbuds App – accessory connection data	Bluetooth name, firmware version, battery level	String / integer	~0.05 KB	Event-driven (when earbuds connect)	Temporary (device OS/Bluetooth cache; not stored or backend)
Fairphone Moments – user preferences	modes, default mode, switch state, wallpaper, app visibility, notification settings, power-saving features	String / integer / boolean	~0.5–1 KB	Event-driven (when configured or changed)	Stored (on device)
Activation Logger: activation report	date/time, device identifiers, OS/build details	String / integer / timestamp	~1 KB	Event-driven (first activation)	Temporary (local until uploaded to backend)
Activation Logger: daily heartbeat	timestamp, firmware fingerprint	String / integer / timestamp	~0.25 KB	Continuous (once daily)	Temporary (local until uploaded to backend)
Activation Logger: legacy cell/network info (MCC-MNC, Cell-ID, TAC, operator_name	String / integer / timestamp	~0.25 KB	Event-driven (OS update)	Temporary (local until uploaded to backend)

*Stored and processed by Fairphone in its own databases, customer relationship management (CRM) systems (Odo), digital experience (DX) platforms (Bloomreach) for service improvements, and/or analytics tools (Google Analytics) for usage analytics.