#### PHONES WITH KEYPAD AND CLOSED SYSTEM - Product

# a) Type, format, and estimated amount of data

- Types of data collected:
  - o Call and SMS/MMS history
  - Contact list (stored locally)
  - o Basic device status (battery level, memory usage)
  - o System events (e.g., missed calls, low battery warnings)
  - Network data (network name, signal strength no GPS, only cell tower connection info)
  - o Limited sensor data (if present: e.g., basic accelerometer but usually none)
- **Data formats:** Proprietary binary files, text-based logs (where supported)
- Estimated data volume: Usually very small from a few kilobytes per day to a few megabytes per month (mainly call/SMS logs).

## b) Real-time data generation

Data is generated only during user activity (calls, SMS sending, receiving) or simple background events (e.g., signal loss, battery warnings). There is no continuous real-time tracking like GPS or motion sensors.

#### c) Data storage

- Local storage only: All data (contacts, call/SMS history, settings) remains on the device memory or removable SIM/SD card.
- **No cloud storage:** No automatic backups or remote synchronization unless performed manually by the user (e.g., via USB cable and computer software).
- **Automatic deletion:** Old SMS/MMS or call logs may be overwritten when storage limit is reached.

### d) Data access, download, and deletion

- Access:
  - o Directly through the phone interface (call log, SMS inbox, contacts menu)
  - Via connection to PC (if manufacturer provides data management software)
- Download:
  - o Manual copy to SIM card, SD card, or export via cable connection
  - o No centralized online export option
- Deletion:
  - Performed manually by user via phone menu (delete message, delete call log, clear contacts)
  - o Full wipe possible via factory reset
- **Technical safeguards:** Basic PIN lock, SIM PIN, sometimes device password. No advanced privacy dashboard or APIs.
- Conditions and quality of service: Entirely offline; device functions are independent of internet access.