

HUAWEI CLOUD Compliance with Nigeria NDPA Privacy Protection Regulations

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Huawei Cloud Computing Technologies Co., Ltd.

Address: Huawei Cloud Data Center Jiaoxinggong Road
Qianzhong Avenue
Gui'an New District
Gui Zhou 550029
People's Republic of China

Website: <https://www.huaweicloud.com/intl/en-us/>

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1 Overview

1.1 Scope of Application

The information provided in this document applies to HUAWEI CLOUD and all its products and services.

1.2 Purpose of Publication

This document is intended to help customers understand:

1. HUAWEI CLOUD's privacy protection responsibility model;
2. Nigeria Data Protection Act 2023 (NDPA) related legal requirements;
3. HUAWEI CLOUD's responsibilities on compliance with Nigeria NDPA, as specified in the responsibility model;
4. HUAWEI CLOUD's controls and achievements in privacy management;
5. Customers' responsibilities and obligations when falling under the jurisdiction of Nigeria NDPA, as specified in the responsibility model;
6. How to leverage HUAWEI CLOUD's security products and services to achieve privacy compliance.

1.3 Basic Definition

- **Data Subject**
Means an individual to whom personal data relates.
- **Personal Data**
Means any information relating to an individual, who can be identified or is identifiable, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, psychological, cultural, social, or economic identity of that individual.
- **Data Controller**

Means an individual, private entity, public Commission, agency or any other body who, alone or jointly with others, determines the purposes and means of processing of personal data.

- **Data Processor**

Means an individual, private entity, public authority, or any other body, who processes personal data on behalf of or at the direction of a data controller or another data processor.

- **Data Controller or Data Processor of Major Importance**

Means a data controller or data processor that is domiciled, resident in, or operating in Nigeria and processes or intends to process personal data of more than such number of data subjects who are within Nigeria, as the Commission may prescribe, or such other class of data controller or data processor that is processing personal data of particular value or significance to the economy, society or security of Nigeria as the Commission may designate.

- **HUAWEI CLOUD**

HUAWEI CLOUD is the cloud service brand of the HUAWEI marquee, committed to providing stable, secure, reliable, and sustainable cloud services.

- **Customer**

HUAWEI CLOUD is the cloud service brand of the HUAWEI marquee, committed to providing stable, secure, reliable, and sustainable cloud services.

- **Account Information**

Personal data, such as names, phone numbers, email addresses, bank accounts and billing information provided by customers to HUAWEI CLOUD when creating or managing their HUAWEI CLOUD accounts. HUAWEI CLOUD acts as the controller of the personal data bank of any personal data included within account information.

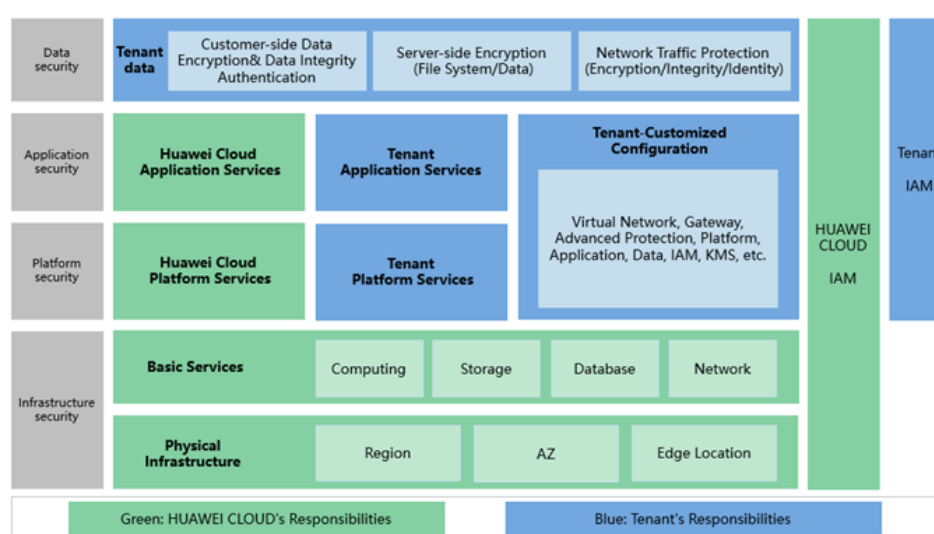
- **Content Data**

Data stored or processed during the use of HUAWEI CLOUD services, including but not limited to documents, software, images, and audio and video files.

2 Privacy Protection Responsibilities

Due to the complex cloud service business model, the security protection of personal data is not the sole responsibility of one single party, but requires the joint effort of both the tenant and HUAWEI CLOUD. As a result, HUAWEI CLOUD proposes a responsibility sharing model to help tenants to understand the privacy protection responsibility scope for both parties and ensure the coverage of all areas of privacy protection. Below is an overview of the responsibilities distribution model between the tenant and HUAWEI CLOUD:

Figure 2-1 Responsibility Sharing Model



As shown in the above figure, the privacy protection responsibilities are distributed between HUAWEI CLOUD and tenants as below:

HUAWEI CLOUD: As the Cloud Service Provider (CSP), HUAWEI CLOUD is not only responsible for the security and compliance of personal data collected or processed during business operations, but also for the platform security defined by the security and compliance of HUAWEI CLOUD's infrastructure, including the cloud platform and software applications offered to tenants.

- **Protection of Tenant Privacy:** HUAWEI CLOUD identifies and protects tenants' personal data. HUAWEI CLOUD's policy, processes and operations not only resulted in the formulation of privacy protection policies but also in the deployment of active privacy control measures, such as anonymization, data encryption, system and platform security protections, all helping to ensure the security of tenants' personal data.

- **Platform and Tenant Security Support:** HUAWEI CLOUD is responsible for the security and compliance of the platform and infrastructure included in the cloud service, ensuring the platform and applications' security levels comply with the requirements of applicable privacy protection laws and regulations. At the same time, HUAWEI CLOUD provides tenants with a variety of privacy protection technologies and services in order to help tenants protect their privacy, such as access control, authentication, data encryption, logging and auditing functions, in order to help tenants protect their privacy according to their commercial requirements.

Tenant: As purchaser of HUAWEI CLOUD's products and services, tenants are free to decide on how to use them to store or process content data, which may include personal data. Therefore, tenants are responsible of Content Security, which is defined as the security and compliance of content data.

- **Content Data Protection:** Tenants should correctly and comprehensively identify personal data in the cloud, formulate policies to protect data security and privacy, and finally select appropriate privacy protection measures. Specific measures should include security configuration based on business and privacy protection requirements, such as operating system configuration, network settings, security protection, database encryption, policy configuration and set appropriate access controls and password policies.
- **Respond to Data Subject Requests:** Tenants should guarantee the rights of data subjects and respond to their requests in a timely manner. In the case of a personal data breach, the tenant should notify both regulatory authorities and data subjects, and take adequate actions in accordance with regulatory requirements.

3 Overview of Nigeria NDPA

3.1 Background of Nigeria NDPA

Nigeria Data Protection Act 2023: This Act was signed into law on 12 June 2023 by the President of Nigeria. The Act creates the Nigerian Data Protection Commission to oversee and regulate the processing of personal data by entities. In addition, the Act also provides for the principles and legal basis for the processing of personal data. It provides a more systematic legal framework for the protection of personal data in Nigeria and guarantees the fundamental rights and freedoms in the Nigerian Constitution promulgated in 1999.

3.2 Role Division and Basic Obligations

Nigeria Data Protection Act 2023 defines three roles: data controller, data processor, and data subject.

Data Subject has the right to withdraw their consent, obtain their personal data, object to the processing of their personal data, update or correct their personal data, delete their personal data, and complain about failure to protect their personal data.

Data Processor's basic obligations include compliance with the principles and obligations applicable to the data controller; assist the data controller or data processor (if applicable) in fulfilling the obligations of the data controller and safeguard the rights of the data subject by implementing appropriate technical and organizational measures; guarantee the security, integrity and confidentiality of personal data by implementing appropriate technical and organizational measures; provide the data controller or data processor (if applicable) with any information it reasonably requests to demonstrate its compliance with the provisions of the Act; inform the data controller or data processor (if applicable) when any new data processor is hired.

Data Controller's basic obligations are heavier than those of a data processor, including:

- **Principles of Personal Data Processing:** When processing personal data, the following principles shall be complied: process personal data in a fair, lawful, and transparent manner; collect personal data for specific, explicit and legitimate purposes; collect only personal data necessary for the purposes of the processing; personal data shall not be retained for longer than the minimum time necessary for the purposes of processing; personal data must be accurate, complete, not misleading, and up-to-date; ensure the security of personal data.

- **Lawful Basis of Personal Data Processing:** The legal basis for processing personal data includes: processing personal data for a specific purpose for which the data subject consent and not withdrawn consent; processing is necessary for the performance of the contract with the data subject or at the request of the data subject prior to the entering of the contract; processing is necessary to fulfil the legal obligations to which the data controller or data processor is subject; processing is necessary to protect the vital interest of the data subject or other person; processing is necessary for the protection of the public interest or the exercise of official authorization vested in the data controller or data processor; processing is necessary for the legitimate interests pursued by the data controller or data processor or third party to whom the data is disclosed.
- **Consent:** Before collecting personal data, the data subject must be informed of certain information, including the purpose of collecting personal data, and consent must be obtained from the data subject, unless other legal reasons are met. The consent of the data subject shall be given voluntarily and intentionally. Data subjects have the right to withdraw their consent at any time.
- **Data Privacy Impact Assessment:** Where the processing of personal data may likely result in high risk to the rights and freedoms of a data subject by virtue of its nature, scope, context, and purposes, a data controller shall, prior to the processing, carry out a data privacy impact assessment.
- **DPO:** A data controller of major importance shall designate a Data Protection Officer with expert knowledge of data protection law and practices and the ability to carry out their tasks.
- **Protect Data Subjects' Rights:** During the processing of personal data, the rights of data subjects must be fully protected. Data subjects have the right to withdraw their consent, obtain their personal data, object to the processing of their personal data, update or correct their personal data, delete their personal data, and complain about failure to protect their personal data.
- **Personal Data Security:** The data controller shall implement appropriate technical and organizational measures to ensure the security, integrity and confidentiality of personal data.
- **Personal Data Breach Notification:** In the event of a personal data breach, the data controller should notify the Nigerian Data Protection Commission within 72 hours of becoming aware of the breach; When a personal data breach may pose a high risk to the rights and freedoms of the data subject, the data subject shall be notified in a timely manner without undue delay.
- **Transfer to a Foreign Country:** The transfer of personal data to another country may only be carried out if there is adequate protection for personal data: the recipient of personal data is bound by law, binding company rules, contractual terms, codes of conduct or authentication mechanisms that are able to provide adequate protection for the personal data; the level of personal data protection in the country where the recipient is located shall not be lower than the level stipulated by Act. Where adequate protection cannot be obtained, the transfer of personal data to another country may only be made available if the data subject consents after being informed of the risks that may arise due to the lack of adequate protection measures; the transfer is necessary for the performance of the contract with the data subject or at the request of the data subject prior to the entering of the contract; the transfer is necessary for the sole benefit of data subjects; the transfer is necessary to safeguard the public interest; the transfer is necessary for the exercise of litigation rights; in cases where the data subject is physically or legally unable to give consent, it is necessary to protect the vital interests of the data subject.

3.3 HUAWEI CLOUD's Role under Nigeria NDPA

Personal data processed by HUAWEI CLOUD mainly includes customers' content data and Personal data provided by customers when performing operations on HUAWEI CLOUD platform, including but not limited to registering, purchasing services, real-name authentication and service support. As customers have full control over their content data, when processing personal data included in content data, HUAWEI CLOUD is generally regarded as the data processor. HUAWEI CLOUD acts as the data controller when dealing with personal data provided by the customers' set up or management of their HUAWEI CLOUD account.

HUAWEI CLOUD acts as the data controller of customers' personal data: When a customer performs operations on HUAWEI CLOUD platform, including but not limited to registering, purchasing services, real-name authentication and service support, HUAWEI CLOUD will collect some personal data, such as the customer's name, address, ID number, bank accounts, and others types of information according to the service used. HUAWEI CLOUD is ultimately responsible for the security and privacy protection of such customers' personal data, ensuring that the collection, processing and storage procedures comply with legal requirements, responding to data subjects' requests.

HUAWEI CLOUD acts as the data processor of customer's content data: When customers use HUAWEI CLOUD services or applications on behalf of a data controller to process personal data included in their content, HUAWEI CLOUD is the data processor. HUAWEI CLOUD processes personal data on behalf of customers in accordance with personal data processing requirements or instructions from the controller of the personal data, and maintains records of data processing operations.

4

How HUAWEI CLOUD is Satisfying the Requirements of Nigeria NDPA

4.1 HUAWEI CLOUD Privacy Commitment

HUAWEI CLOUD has placed cyber security and privacy protection as top priorities. HUAWEI CLOUD has fully integrated cyber security and privacy protection into each cloud service providing and promising to provide customers with stable, reliable, secure, trustworthy, and evolvable services while respecting and protecting customers' privacy.

HUAWEI CLOUD solemnly treats and actively assumes corresponding responsibilities to comply with global privacy protection laws and regulations. HUAWEI CLOUD not only has set up professional privacy protection teams, but also develops and optimizes processes and new technologies, and continuously builds up privacy protection capabilities to achieve its own privacy protection objectives: strictly safeguarding services' boundaries, protecting customers' personal data security, and helping customers implement privacy protections.

4.2 HUAWEI CLOUD Basic Privacy Protection Principles

- **Lawfulness, Fairness and Transparency**

HUAWEI CLOUD processes personal data of data subjects lawfully, fairly and in a transparent manner.

- **Purpose Limitation**

HUAWEI CLOUD collects personal data for determined, explicit and lawful purposes and will not further process the data in a manner that is incompatible with those purposes.

- **Data Minimization**

When HUAWEI CLOUD processes personal data, personal data should be adequate, relevant, and limited to what is necessary in relation to the purposes for which the data is processed. Personal data will be anonymized or pseudonymized to the extent possible to reduce the risks for data subjects.

- **Accuracy**

HUAWEI CLOUD ensures that personal data is accurate and, when necessary, kept up to date. Every reasonable step must be taken to ensure that inaccurate personal data is erased or rectified without delay depending on the purpose of data processing.

- **Storage Limitation**

Personal data will not be kept beyond the period necessary for the purposes of data processing.

- **Integrity and Confidentiality**

Taking into account the existing technical capabilities, implementation costs, and likelihood and severity of privacy risks, HUAWEI CLOUD processes personal data in a manner that ensures appropriate security of the personal data, including protection against accidental or unlawful destruction, loss, alteration, or unauthorized access and disclosure by using appropriate technical or organizational measures.

- **Accountability**

HUAWEI CLOUD is responsible for and able to demonstrate compliance with the preceding principles.

4.3 HUAWEI CLOUD's Compliance Measures in Response to Nigeria NDPA

Based on the characteristics of HUAWEI CLOUD's business and in accordance with the requirements of the Nigeria NDPA, HUAWEI CLOUD, as a legal entity that processes personal data, assumes two roles of data controller and data processor in different scenarios. HUAWEI CLOUD actively responds and fulfills its obligations by adopting the following personal data protection mechanisms and technologies to comply with the requirements of the Nigeria NDPA.

Basic Legal Obligations	Specific Requirements Applicable to HUAWEI CLOUD (As the data controller)	Measures Taken by HUAWEI CLOUD
Principles of Personal Data Processing	<p>When processing personal data, the following principles shall be complied:</p> <ol style="list-style-type: none">1. process personal data in a fair, lawful, and transparent manner;2. collect personal data for specific, explicit and legitimate purposes;3. collect only personal data necessary for the purposes of the processing;4. personal data shall not be retained for longer than the minimum time necessary for the purposes of processing;5. personal data must be accurate, complete, not misleading, and up-to-date;6. ensure the security of personal	<p>HUAWEI CLOUD follows the basic principles of privacy protection of being lawful, fair, transparent, and data minimization. HUAWEI CLOUD will evaluate business needs before collecting personal data, collect only the minimum personal data required by the business, clarify the type of personal data collected, and select the appropriate and legal personal data collection basis. In addition, HUAWEI CLOUD clearly informs customers of the types of personal data to be collected, purposes, and legal basis of personal data collection and processing in the Privacy Policy Statement, so that customers can clearly</p>

Basic Legal Obligations	Specific Requirements Applicable to HUAWEI CLOUD (As the data controller)	Measures Taken by HUAWEI CLOUD
	data.	<p>understand related personal data processing activities and agree to them. If the purchased service or after-sales service involves personal data collection or use purposes other than those specified in the privacy statement, an additional privacy statement will be provided in the product agreement of the product and the consent of the data subject will be obtained. When the scope or purpose of personal data collected by a product or service changes, the privacy statement will be updated and the customer's consent will be obtained again.</p> <p>HUAWEI CLOUD clearly informs customers of the purposes of personal data processing in the Privacy Policy Statement and collects personal data based on the purposes disclosed in the Privacy Policy Statement. HUAWEI CLOUD regularly conducts privacy impact assessments for products and services involving personal data to prevent the collection of personal data involved in products and services from exceeding the minimum scope required for actual purposes, and avoid excessive collection of personal data.</p> <p>Unless otherwise required by laws or customers, HUAWEI CLOUD will retain personal data for a period of time that is necessary to achieve the processing purposes described in the Privacy Policy Statement. (The retention period of personal data may vary depending on the processing purpose and</p>

Basic Legal Obligations	Specific Requirements Applicable to HUAWEI CLOUD (As the data controller)	Measures Taken by HUAWEI CLOUD
		<p>service). In addition, unless otherwise specified by applicable laws and regulations, HUAWEI CLOUD will anonymize or delete unnecessary personal data after the storage period expires after the customer deregisters the HUAWEI CLOUD account.</p> <p>In the Privacy Policy Statement, HUAWEI CLOUD clearly informs data subjects of their privacy rights, such as the right to access, correct, delete, object, restrict processing, portability, consent withdrawal, and complaints to regulators. HUAWEI CLOUD provides customers with convenient channels for exercising data subjects' rights. When a data subject requests to correct his/her personal data, HUAWEI CLOUD will promptly respond to the rights of the data subject and correct the personal data to maintain the accuracy of the personal data.</p> <p>HUAWEI CLOUD attaches great importance to and takes appropriate physical, technical, and organizational measures to protect the security, accuracy, and integrity of personal data, including but not limited to:</p> <ul style="list-style-type: none"> ● Sets up a privacy protection organization to identify and manage personal data protection risks. ● Adopts strict data security and personal data protection policies, in accordance with the risk of the categories of data processed. Develops security breach response and data breach process to reduce privacy and security risks brought by personal

Basic Legal Obligations	Specific Requirements Applicable to HUAWEI CLOUD (As the data controller)	Measures Taken by HUAWEI CLOUD
		<p>data breaches and guide relevant departments to handle personal data in compliance with laws and regulations.</p> <ul style="list-style-type: none"> ● Holds security and privacy protection training courses, tests, and publicity activities to raise employees' personal data protection awareness. ● Takes reasonable and feasible measures to ensure that the personal data collected is minimal and relevant to what is necessary in relation to the purposes for which they are processed. ● Takes a range of measures such as an entrance and exit control, entrance guard systems and CCTV system to ensure the physical security of the data centers to prevent unauthorized persons from gaining access to data processing systems with which personal data are processed or used. ● Deploys access control mechanisms and implements hierarchical permission management on them based on service requirements and personnel levels to ensure that only authorized personnel can access personal data. ● Clearly defines and assigns cyber security roles and responsibilities, and implements separation of duties (SOD) based on a risk assessment to reduce risks to prevent data processing systems from being used by unauthorized persons.

Basic Legal Obligations	Specific Requirements Applicable to HUAWEI CLOUD (As the data controller)	Measures Taken by HUAWEI CLOUD
		<ul style="list-style-type: none"> ● Encryption and pseudonymisation of personal data, as appropriate, using recommended industry standard protocols to prevent data breach and unauthorized access, ● Degausses the discarded storage media before returning to the warehouse to ensure that software-based overwriting shall be performed on media prior to their disposal. In cases where this is not possible (CD's, DVD's, etc.) physical destruction shall be performed. ● Implements appropriate O&M security management and technical measures, including identity authentication and access control, change and event management, vulnerability management, configuration management, event logging, and continuously monitors cyber security events and threats, detects exceptions in a timely manner, and proactively takes measures to deal with them to ensure that personal data cannot be read, copied, altered or removed by unauthorized persons. ● Implements protection mechanisms such as DDoS protection to protect networks from attacks, develops vulnerability management policies, evaluation standards, and management processes to manage security vulnerabilities throughout the lifecycle. In addition,

Basic Legal Obligations	Specific Requirements Applicable to HUAWEI CLOUD (As the data controller)	Measures Taken by HUAWEI CLOUD
		<p>regularly runs vulnerability scanning programs to detect potential security vulnerabilities and promptly take countermeasures.</p> <ul style="list-style-type: none"> ● Strictly selects business partners and service providers and incorporates personal data protection requirements into commercial contracts, audits, and appraisal activities. <p>In addition, HUAWEI CLOUD has obtained multiple certifications in relation to privacy compliance international standard, including ISO 27701, ISO 29151, ISO 27018, BS 10012, the audit report of SOC2 Type 1 privacy principle, and etc. Customers can also understand personal data security controls within HUAWEI CLOUD's environment through HUAWEI CLOUD security reports or certifications.</p>
Lawful Basis of Personal Data Processing	<p>The legal basis for processing personal data includes:</p> <ol style="list-style-type: none"> 1. processing personal data for a specific purpose for which the data subject consent and not withdrawn consent; 2. processing is necessary for the performance of the contract with the data subject or at the request of the data subject prior to the entering of the contract; 3. processing is necessary to fulfil the legal obligations to which the data controller or data processor is subject; 4. processing is necessary to protect the vital interest of the data subject or other person; 5. processing is necessary for the 	<p>HUAWEI CLOUD will clearly describe the legal basis for HUAWEI CLOUD to process customers' personal data in the Privacy Policy Statement. HUAWEI CLOUD will process the customer's personal data based on one or more of the following legal basis:</p> <ul style="list-style-type: none"> ● Data subjects' consent; ● Enter into a contract with the customer or the legal entity on which the customer represents, or perform contractual obligations, such as providing services, responding to customer requests, or providing

Basic Legal Obligations	Specific Requirements Applicable to HUAWEI CLOUD (As the data controller)	Measures Taken by HUAWEI CLOUD
	<p>protection of the public interest or the exercise of official authorization vested in the data controller or data processor;</p> <p>6. processing is necessary for the legitimate interests pursued by the data controller or data processor or third party to whom the data is disclosed.</p>	<p>customer support;</p> <ul style="list-style-type: none"> ● Necessary to safeguard legitimate interests and third-party interests; ● Necessary to comply with applicable laws and fulfill relevant legal obligations.
Consent	<ol style="list-style-type: none"> 1. Before collecting personal data, the data subject must be informed of certain information, including the purpose of collecting personal data, and consent must be obtained from the data subject, unless other legal reasons are met. 2. The consent of the data subject shall be given voluntarily and intentionally. 3. Data subjects have the right to withdraw their consent at any time. 	<p>When a customer registers an account, HUAWEI CLOUD will display the Privacy Policy Statement to the customer, which clearly informs the customer of the type of personal data to be collected, the purpose and legal basis of personal data collection and processing, and the rights of data subjects, and obtains the customer's consent. Additional privacy notices will be provided in the product agreement and the customer's consent will be obtained again if the purchased or after-sales service of the related product involves the collection or use of personal data for purposes other than those originally stated in the privacy statement. When the scope or use purpose of personal data collected by the product or service changes, the privacy statement will be updated accordingly and customers will be asked again for their consent.</p> <p>In the Privacy Policy Statement, HUAWEI CLOUD informs customers of the right to withdraw their consent to personal data at any time. HUAWEI CLOUD provides customers with easy channels to withdraw consent. Customers have the right to decide whether and when to withdraw consent to stop the collection of their personal data by HUAWEI</p>

Basic Legal Obligations	Specific Requirements Applicable to HUAWEI CLOUD (As the data controller)	Measures Taken by HUAWEI CLOUD
		CLOUD's products or services. Withdrawal of consent will not affect the normal use of other HUAWEI CLOUD products or services.
Data Privacy Impact Assessment	Where the processing of personal data may likely result in high risk to the rights and freedoms of a data subject by virtue of its nature, scope, context, and purposes, a data controller shall, prior to the processing, carry out a data privacy impact assessment.	To effectively identify and control privacy risks, HUAWEI CLOUD conducts extensive privacy risk analysis and management in various cloud services. Service scenarios that pose high risks to the rights and freedoms of data subjects. HUAWEI CLOUD requires data protection impact assessment (DPIA) before processing personal data. The DPIA mainly includes identifying personal data items involved in business, business scenarios and processing, compliance analysis, possible impacts on data subjects, risk analysis, and risk control measures and plans. All privacy risk control requirements are incorporated into the design solution. Business can only be conducted if privacy risks are reduced to an acceptable level.
DPO	A data controller of major importance shall designate a Data Protection Officer with expert knowledge of data protection law and practices and the ability to carry out their tasks.	Currently, HUAWEI CLOUD has set up a data protection officer. If you have any questions, comments, suggestions, etc., the customer can contact the Data Protection Officer at the email address provided in the Privacy Policy Statement.
Protect Data Subjects' Rights	During the processing of personal data, the rights of data subjects must be fully protected. Data subjects have the right to withdraw their consent, obtain their personal data, object to the processing of their personal data, update or correct their personal data, delete their personal data, and complain	In the Privacy Policy Statement , HUAWEI CLOUD clearly informs data subjects of their privacy rights, such as the right to access, correct, delete, object, restrict processing, portability, consent withdrawal, and complaints to regulators. HUAWEI CLOUD provides

Basic Legal Obligations	Specific Requirements Applicable to HUAWEI CLOUD (As the data controller)	Measures Taken by HUAWEI CLOUD
	about failure to protect their personal data.	customers with convenient channels for exercising data subjects' rights. When a data subject submits a data subject's rights request to HUAWEI CLOUD, HUAWEI CLOUD will respond to the data subject's rights request in a timely manner.
Personal Data Security	The data controller shall implement appropriate technical and organizational measures to ensure the security, integrity and confidentiality of personal data.	<p>HUAWEI CLOUD attaches great importance to and takes appropriate physical, technical, and organizational measures to protect the security, accuracy, and integrity of personal data. For details about the protection measures taken by HUAWEI CLOUD, see the Privacy Policy Statement.</p> <p>In addition, HUAWEI CLOUD has obtained multiple certifications in relation to privacy compliance international standard, including ISO 27701, ISO 29151, ISO 27018, BS 10012, the audit report of SOC2 Type 1 privacy principle, and etc. Customers can also understand personal data security controls within HUAWEI CLOUD's environment through HUAWEI CLOUD security reports or certifications.</p>
Personal Data Breach Notification	<ol style="list-style-type: none"> 1. In the event of a personal data breach, the data controller should notify the Nigerian Data Protection Commission within 72 hours of becoming aware of the breach. 2. When a personal data breach may pose a high risk to the rights and freedoms of the data subject, the data subject shall be notified in a timely manner without undue delay. 	<p>HUAWEI CLOUD has set up a professional security incident response team. This team discloses personal data breaches in a timely manner in compliance with applicable laws and regulations and executes the adequate contingency plan and recovery process to reduce the impact on customers.</p> <p>HUAWEI CLOUD formulates the classification and escalation principles of information</p>

Basic Legal Obligations	Specific Requirements Applicable to HUAWEI CLOUD (As the data controller)	Measures Taken by HUAWEI CLOUD
		<p>security incidents, ranks them according to their degree of impact on the data subjects' business, initiates the notification process according to the notification mechanism of security incidents, and notifies data subjects of the incident.</p> <p>When serious events occur and have or may have a serious impact on multiple customers, HUAWEI CLOUD will promptly notify customers of events with an announcement. The contents of the notification shall at least include a description of the event, the cause, impact, measures taken by HUAWEI CLOUD and the measures recommended for customers. In addition, necessary regulatory filings will be conducted in accordance with local regulations.</p>
Transfer to a Foreign Country	<ol style="list-style-type: none"> 1. The transfer of personal data to another country may only be carried out if there is adequate protection for personal data: <ol style="list-style-type: none"> 1) the recipient of personal data is bound by law, binding company rules, contractual terms, codes of conduct or authentication mechanisms that are able to provide adequate protection for the personal data; 2) the level of personal data protection in the country where the recipient is located shall not be lower than the level stipulated by Act. 2. Where adequate protection cannot be obtained, the transfer of personal data to another country may only be made available if: 	<p>HUAWEI CLOUD has stated in the Privacy Policy Statement that it will provide services to customers through HUAWEI CLOUD's global resources. Therefore, customers' personal data may be transferred to or accessed by HUAWEI CLOUD, HUAWEI CLOUD affiliates, and HUAWEI CLOUD partners in countries or regions where they are located. In this case, HUAWEI CLOUD will ensure that the transfer complies with relevant laws and regulations (including ensuring that overseas recipients comply with and fulfil relevant confidentiality and data protection obligations) and HUAWEI CLOUD Privacy Policy Statement.</p> <p>HUAWEI CLOUD has set up a privacy protection expert team</p>

Basic Legal Obligations	Specific Requirements Applicable to HUAWEI CLOUD (As the data controller)	Measures Taken by HUAWEI CLOUD
	<ol style="list-style-type: none"> 1) the data subject consents after being informed of the risks that may arise due to the lack of adequate protection measures; 2) the transfer is necessary for the performance of the contract with the data subject or at the request of the data subject prior to the entering of the contract; 3) the transfer is necessary for the sole benefit of data subjects; 4) the transfer is necessary to safeguard the public interest; 5) the transfer is necessary for the exercise of litigation rights; 6) in cases where the data subject is physically or legally unable to give consent, it is necessary to protect the vital interests of the data subject. 	to evaluate the level of personal data protection provided by the countries involved in data transmission and determine the legal basis for cross-border data transmission. For countries and regions where the business is located, HUAWEI CLOUD also has dedicated legal and privacy protection personnel to help HUAWEI CLOUD take necessary measures according to applicable privacy laws and regulations.

Basic Legal Obligations	Specific Requirements Applicable to HUAWEI CLOUD (As the data processor)	Measures Taken by HUAWEI CLOUD
Obligations of the Data Processor	<ol style="list-style-type: none"> 1. Comply with the principles applicable to the data controller; 2. Assist the data controller or data processor (if applicable) in fulfilling the obligations of the data controller and safeguard the rights of the data subject by implementing appropriate technical and organizational measures; 3. Guarantee the security, integrity and confidentiality of personal data by implementing appropriate technical and 	<p>HUAWEI CLOUD only processes data according to the customer's instructions. The customer shall collect personal data in a fair and transparent manner and ensure that the purpose is appropriate. The customer shall not use personal data for purposes other than those agreed upon. In addition, the basis, purpose, scope, accuracy, and data retention period of content data collection are managed by the customer.</p> <p>As a personal data processor,</p>

Basic Legal Obligations	Specific Requirements Applicable to HUAWEI CLOUD (As the data processor)	Measures Taken by HUAWEI CLOUD
	<p>organizational measures;</p> <p>4. Provide the data controller or data processor (if applicable) with any information it reasonably requests to demonstrate its compliance with the provisions of the Act;</p> <p>5. Inform the data controller or data processor (if applicable) when any new data processor is hired.</p>	<p>HUAWEI CLOUD takes appropriate physical, technical, and organizational measures to help customers protect the security, accuracy, and integrity of personal data to meet security obligations specified by laws. For details about the protection measures taken by HUAWEI CLOUD as a personal data processor, see the Data Processing Addendum.</p> <p>In addition to security obligations, HUAWEI CLOUD will take proactive measures to assist customers in meeting other obligations under applicable data protection laws and assist customers in responding to data subjects' rights requests. When a data subject submits a data subject's rights request to HUAWEI CLOUD, HUAWEI CLOUD will notify the customer of the request in a timely manner and respond only according to the customer's instructions.</p> <p>In the Data Processing Addendum, HUAWEI CLOUD states that each Party shall comply with data protection laws and regulations related to the performance of the Agreement and shall be able to prove its legality. HUAWEI CLOUD will provide the customer with all necessary information to prove that the customer complies with the obligations specified in this Agreement and relevant laws and regulations.</p> <p>HUAWEI CLOUD stated in the Data Processing Addendum that HUAWEI CLOUD will seek the customer's consent on hiring sub-processors to carry out specific processing activities. In addition, if the</p>

Basic Legal Obligations	Specific Requirements Applicable to HUAWEI CLOUD (As the data processor)	Measures Taken by HUAWEI CLOUD
		sub-processor changes, HUAWEI CLOUD will update the sub-processor list and notify the customer. The customer has the right to object to the change.

5

How HUAWEI CLOUD Supports Customers to Comply with Nigeria NDPA

5.1 Customers' Privacy Protection Responsibilities

When the customer is the data controller and HUAWEI CLOUD provides assistance in processing personal data in the customer's content data, or when the customer is the data processor and use HUAWEI CLOUD's services to process personal data, the customer is likely to fall within the jurisdiction of Nigeria Data Protection Act 2023. If so, customers should meet the compliance requirements of Nigeria Data Protection Act 2023, and HUAWEI CLOUD will provide compliance support to customers in the following areas.

Basic Legal Obligations	Specific Requirements Applicable to Customer (As the data controller)	Measures Taken by HUAWEI CLOUD
Principles of Personal Data Processing	<p>When processing personal data, the following principles shall be complied:</p> <ol style="list-style-type: none">1. process personal data in a fair, lawful, and transparent manner;2. collect personal data for specific, explicit and legitimate purposes;3. collect only personal data necessary for the purposes of the processing;4. personal data shall not be retained for longer than the minimum time necessary for the purposes of processing;5. personal data must be accurate, complete, not misleading, and up-to-date;6. ensure the security of personal data.	<p>HUAWEI CLOUD only processes data according to the customer's instructions. The customer shall collect personal data in a fair and transparent manner and ensure that the purpose is appropriate. The customer shall not use personal data for purposes other than those agreed upon. In addition, the basis, purpose, scope, accuracy, and data retention period of content data collection are managed by the customer.</p> <p>HUAWEI CLOUD will inform customers of the types of personal data to be collected and processed in the service statements of some products and services to help customers formulate their privacy policies more accurately and meet the basic principles of fair, legal, and transparent data protection.</p>

Basic Legal Obligations	Specific Requirements Applicable to Customer (As the data controller)	Measures Taken by HUAWEI CLOUD
		<p>In addition, customers should develop a mechanism for deleting personal data in content data and delete specified data through cloud database products. Most HUAWEI CLOUD products or services provide the data deletion function. Customers can proactively delete customer content data to minimize the data retention time.</p> <p>HUAWEI CLOUD provides customers with various data security and privacy protection tools. For example, Database Security Service (DBSS) provides customers with functions such as user behavior discovery and audit, sensitive data protection, and real-time alarm, ensuring the security and integrity of customers' cloud data. Identity and Access Management (IAM) provides identity authentication and permission management functions to manage user accounts (such as employee accounts, system accounts, and applications) and control the operation permissions of these users on resources to prevent unauthorized access. Customers can use the data security and privacy protection tools provided by HUAWEI CLOUD to meet their requirements and ensure the security of personal data.</p>
Lawful Basis of Personal Data Processing	<p>The legal basis for processing personal data includes:</p> <ol style="list-style-type: none"> 1. processing personal data for a specific purpose for which the data subject consent and not withdrawn consent; 2. processing is necessary for the performance of the contract with the data subject or at the request 	<p>HUAWEI CLOUD only processes data according to the customer's instructions. The customer shall collect personal data in a fair and transparent manner and ensure that the purpose is appropriate. The customer shall not use personal data for purposes other than those agreed upon. In addition,</p>

Basic Legal Obligations	Specific Requirements Applicable to Customer (As the data controller)	Measures Taken by HUAWEI CLOUD
	<p>of the data subject prior to the entering of the contract;</p> <ol style="list-style-type: none"> processing is necessary to fulfil the legal obligations to which the data controller or data processor is subject; processing is necessary to protect the vital interest of the data subject or other person; processing is necessary for the protection of the public interest or the exercise of official authorization vested in the data controller or data processor; processing is necessary for the legitimate interests pursued by the data controller or data processor or third party to whom data is disclosed. 	<p>the basis, purpose, scope, accuracy, and data retention period of content data collection are managed by the customer.</p> <p>HUAWEI CLOUD will inform customers of the types of personal data to be collected and processed in the service statements of some products and services to help customers formulate their privacy policies more accurately and meet the basic principles of fair, legal, and transparent data protection.</p>
Consent	<ol style="list-style-type: none"> Before collecting personal data, the data subject must be informed of certain information, including the purpose of collecting personal data, and consent must be obtained from the data subject, unless other legal reasons are met. The consent of the data subject shall be given voluntarily and intentionally. Data subjects have the right to withdraw their consent at any time. 	<p>HUAWEI CLOUD only processes data according to the customer's instructions. The customer shall collect personal data in a fair and transparent manner and ensure that the purpose is appropriate. The customer shall not use personal data for purposes other than those agreed upon. In addition, the basis, purpose, scope, accuracy, and data retention period of content data collection are managed by the customer.</p> <p>HUAWEI CLOUD will inform customers of the types of personal data to be collected and processed in the service statements of some products and services to help customers formulate their privacy policies more accurately and meet the basic principles of fair, legal, and transparent data protection.</p>
Data Privacy Impact Assessment	Where the processing of personal data may likely result in high risk to the rights and freedoms of a data subject by virtue of its nature, scope, context, and purposes, a data	Customers have full control over their content data. HUAWEI CLOUD only processes and collects data according to customers'

Basic Legal Obligations	Specific Requirements Applicable to Customer (As the data controller)	Measures Taken by HUAWEI CLOUD
	controller shall, prior to the processing, carry out a data privacy impact assessment.	instructions or requirements, and does not manage the purpose of collecting content data.
DPO	A data controller of major importance shall designate a Data Protection Officer with expert knowledge of data protection law and practices and the ability to carry out their tasks.	——
Protect Data Subjects' Rights	During the processing of personal data, the rights of data subjects must be fully protected. Data subjects have the right to withdraw their consent, obtain their personal data, object to the processing of their personal data, update or correct their personal data, delete their personal data, and complain about failure to protect their personal data.	HUAWEI CLOUD will take proactive measures to assist customers in meeting their obligations under applicable data protection laws and assist customers in responding to data subjects' rights requests. When a data subject submits a data subject's rights request to HUAWEI CLOUD, HUAWEI CLOUD will notify the customer of the request in a timely manner and respond only according to the customer's instructions.
Personal Data Security	The data controller shall implement appropriate technical and organizational measures to ensure the security, integrity and confidentiality of personal data.	HUAWEI CLOUD provides customers with multiple privacy protection technologies and services. For example, Identity and Access Management (IAM) can be used to prevent unauthorized modification of content data by implementing appropriate user management, identity authentication, and fine-grained access control on cloud resources. Customers can use Data Encryption Workshop (DEW) to centrally manage keys throughout the lifecycle to ensure data integrity during storage. With the products and services provided by HUAWEI CLOUD, customers can better carry out personal data protection activities based on service requirements to meet their own requirements.

Basic Legal Obligations	Specific Requirements Applicable to Customer (As the data controller)	Measures Taken by HUAWEI CLOUD
Personal Data Breach Notification	<ol style="list-style-type: none"> In the event of a personal data breach, the data controller should notify the Nigerian Data Protection Commission within 72 hours of becoming aware of the breach. When a personal data breach may pose a high risk to the rights and freedoms of the data subject, the data subject shall be notified in a timely manner without undue delay. 	In the event of a personal data breach, HUAWEI CLOUD will immediately notify the customer through relevant channels (including but not limited to emails and SMS messages) after discovering the personal data breach and assist the customer in handling the personal data breach to comply with relevant laws and regulations.
Transfer to a Foreign Country	<ol style="list-style-type: none"> The transfer of personal data to another country may only be carried out if there is adequate protection for personal data: <ol style="list-style-type: none"> the recipient of personal data is bound by law, binding company rules, contractual terms, codes of conduct or authentication mechanisms that are able to provide adequate protection for the personal data; the level of personal data protection in the country where the recipient is located shall not be lower than the level stipulated by Act. Where adequate protection cannot be obtained, the transfer of personal data to another country may only be made available if: <ol style="list-style-type: none"> the data subject consents after being informed of the risks that may arise due to the lack of adequate protection measures; the transfer is necessary for the performance of the contract with the data subject or at the request of the data subject prior to the entering of the contract; the transfer is necessary for the sole benefit of data 	<p>HUAWEI CLOUD points out in the Data Processing Addendum that the region for processing customer data can be specified by the customer. HUAWEI CLOUD can transfer customer data from the region selected by the customer only in the following cases:</p> <ul style="list-style-type: none"> Necessary to provide the services required by the customer, especially to investigate security incidents or violations of this Agreement. Necessary to comply with applicable laws and regulations or binding orders issued by courts or competent public authorities. <p>HUAWEI CLOUD also states in the Data Processing Addendum that relevant parties should recognize that applicable data protection laws do not require a data transfer agreement when transferring customer data to a country that is deemed to have an adequate level of protection. When transferring customer data to another third country, HUAWEI CLOUD will sign a data transfer agreement with the recipient located in the third</p>

Basic Legal Obligations	Specific Requirements Applicable to Customer (As the data controller)	Measures Taken by HUAWEI CLOUD
	<p>subjects;</p> <p>4) the transfer is necessary to safeguard the public interest;</p> <p>5) the transfer is necessary for the exercise of litigation rights;</p> <p>6) in cases where the data subject is physically or legally unable to give consent, it is necessary to protect the vital interests of the data subject.</p>	<p>country.</p> <p>HUAWEI CLOUD has a dedicated team to communicate with customers. Customers can contact HUAWEI CLOUD to obtain information such as the destination country name and recipient name.</p> <p>It is recommended that the customer evaluate the level of personal data protection provided by the countries involved in the data transfer and use a formal mechanism to transfer personal data across borders.</p>

Basic Legal Obligations	Specific Requirements Applicable to Customer (As the data processor)	Measures Taken by HUAWEI CLOUD
Obligations of the Data Processor	<ol style="list-style-type: none"> 1. Comply with the principles applicable to the data controller; 2. Assist the data controller or data processor (if applicable) in fulfilling the obligations of the data controller and safeguard the rights of the data subject by implementing appropriate technical and organizational measures; 3. Guarantee the security, integrity and confidentiality of personal data by implementing appropriate technical and organizational measures; 4. Provide the data controller or data processor (if applicable) with any information it reasonably requests to demonstrate its compliance with the provisions of the Act; 5. Inform the data controller or data processor (if applicable) when any new data processor is hired. 	<p>HUAWEI CLOUD provides customers with various data security and privacy protection tools. For example, Database Security Service (DBSS) provides customers with functions such as user behavior discovery and audit, sensitive data protection, and real-time alarm, ensuring the security and integrity of customers' cloud data. Identity and Access Management (IAM) provides identity authentication and permission management functions to manage user accounts (such as employee accounts, system accounts, and applications) and control the operation permissions of these users on resources to prevent unauthorized access. Customers can use the data security and privacy protection tools provided by HUAWEI CLOUD to meet their requirements and ensure the security of personal</p>

Basic Legal Obligations	Specific Requirements Applicable to Customer (As the data processor)	Measures Taken by HUAWEI CLOUD
		data. HUAWEI CLOUD has a dedicated team to communicate with customers. If you have any questions, comments, or suggestions, you can contact HUAWEI CLOUD at the email address provided in the Privacy Policy Statement for help.

5.2 How HUAWEI CLOUD Products and Services Help Customers Implementing Content Data Privacy and Security

HUAWEI CLOUD has a deep understanding of the importance of customers' privacy protection needs, combining it with its own privacy protection practices and technical capabilities in order to help customers to achieve compliance with the Nigeria NDPA leveraging HUAWEI CLOUD products and services. HUAWEI CLOUD provides customers with a large range of products and services such as networking products, database products, security products, solutions for management and deployment as well as other products. Data protection, data deletion, network isolation, rights management and other functions implemented in HUAWEI CLOUD products can help customers implement privacy and security of content data.

- **Management and Deployment Products**

Product	Description	Corresponding Core Requirements and Control Measures
Identity and Access Management (IAM)	Identity and Access Management (IAM) provides identity authentication and permissions management. With IAM, customers can create users for employees, applications, or systems in their organization, and control the users' permissions on owned resources. Through IAM, customers can perform user management, identity authentication, and fine-grained resource access control on the cloud to prevent unauthorized modification of content data.	Lawful Basis of Personal Data Processing Personal Data Security
Cloud Trace Service (CTS)	Customers can review logs to perform security analysis, review compliance, and locate issues, etc.	Lawful Basis of Personal Data Processing Principles of Personal

Product	Description	Corresponding Core Requirements and Control Measures
	Customers can configure CTS object storage service to save operation records to CTS in real time and for a long period, protect the right to know of data owners, and enable quick searching.	Data Processing Protect Data Subjects' Rights
Cloud Eye Service (CES)	Providing customers with a multidimensional monitoring platform for elastic cloud servers, bandwidth and other resources. Through CES, customers can have a comprehensive understanding of HUAWEI CLOUD resources usage and business operations status, and respond to alarms in time to ensure business continuity.	Lawful Basis of Personal Data Processing Personal Data Security
Log Tank Service (LTS)	Providing functions such as log collection, real-time query and storage, which can be used to make real-time decision analysis, improve the efficiency of log processing, and help customers to cope with daily operations and maintenance scenarios such as real-time logs collection and query analysis without development's requirements. Customers can keep records of operations on personal data through LTS to guarantee the data owners' right to know.	Lawful Basis of Personal Data Processing Protect Data Subjects' Rights

- **Security Products**

Product	Description	Corresponding Core Requirements and Control Measures
Database Security Service (DBSS)	Database Security Service (DBSS) uses machine learning mechanism and big data technologies to protect customers' databases on the cloud, audit and detect risky behaviors, such as SQL injection, operational risks identification, etc. Customers can use DBSS to detect potential risks and ensure the security of their databases.	Personal Data Security
Data Encryption Workshop (DEW)	Data Encryption Workshop (DEW) is a full-stack data encryption service. It covers Key Management Service (KMS), Key Pair Service (KPS), and Dedicated HSM. With DEW, customers can develop customized	Personal Data Security

	<p>encryption applications, and integrate it with other HUAWEI CLOUD services to meet the most demanding encryption scenarios. Customers can also use the service to develop their own encryption applications.</p> <p>Customers can use DEW for centralized key lifecycle management to ensure the integrity of data storage procedures.</p>	
Web Application Firewall(WAF)	<p>Web Application Firewall (WAF) can conduct multi-dimensional detection and protection of website traffic combining with deep machine learning to identify malicious requests, protect against unknown threats, and block common attacks such as SQL injection or cross-site scripting.</p> <p>Customers can use WAF to protect their websites or servers from external attacks that affect the availability, security, or unwanted additional resources consumption of their web applications, reducing the risk of data tampering and theft.</p>	Personal Data Security
Advanced Anti-DDoS (AAD)	<p>Advanced Anti-DDoS (AAD) is a value-added security defense service that defends against large volumetric DDoS attacks on Internet servers.</p> <p>Customers can configure AAD to divert the attack traffic to high-defense IP addresses with significant defense capabilities for scrubbing, keeping customers' business stable and reliable.</p>	Personal Data Security
Data Security Center (DSC)	<p>Data Security Center (DSC) is a new-generation cloud-native data security platform that provides basic data security capabilities which helps identify, classify, and mask sensitive or confidential data</p> <p>Customers can use DSC to integrate the status of each phase of the data security lifecycle to build a cloud service panorama to protect the security of data collection, storage, transmission, use, exchange, and destruction.</p>	Personal Data Security
Cloud Certificate Manager (CCM)	<p>Cloud Certificate Manager (CCM) is a cloud service that provides one-stop lifecycle management of digital certificates including SSL certificate and private certificate.</p> <p>Customers can use CCM to improve the confidentiality and security of SSL certificates and private certificates, improve</p>	Personal Data Security

	the security of access and transmission channels, and reduce the risk of unauthorized data intrusion, access, or theft during transmission and access.	
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- **Network Products**

Product	Description	Corresponding Core Requirements and Control Measures
Virtual Private Network (VPN)	Virtual Private Network (VPN) establishes a flexible, scalable IPsec encrypted communication channel between customers' local data center and their VPC on HUAWEI CLOUD. Customers can build a flexible and scalable hybrid cloud computing environment, and improve their security posture with encryption of the communication channel.	Personal Data Security
Virtual Private Cloud (VPC)	Virtual Private Cloud (VPC) enables customers to create private, isolated virtual networks on HUAWEI CLOUD. Customers can configure IP address ranges, subnets, and security groups, assign Elastic IP (EIP) addresses, and allocate bandwidth in a VPC. VPC is the customer's private network on the cloud, with 100% isolation from other customers, enhancing the data security on the cloud.	Personal Data Security

- **Storage Products**

Product	Description	Corresponding Core Requirements and Control Measures
Volume Backup Service (VBS)	Volume Backup Service (VBS) creates online permanent incremental backup for cloud hard disk, automatically encrypts the backup disk data, and can restore the data to any backup point to enhance data availability. VBS can reduce the possibility of virus attack, human error deletion as well as hardware or software failure, protect data security and reliability, and reduce the risk of data tampering.	Personal Data Security
Cloud Server Backup	Cloud Server Backup Service (CSBS) can simultaneously create a consistent online	Personal Data Security

Product	Description	Corresponding Core Requirements and Control Measures
Service (CSBS)	<p>backup of multiple cloud drives within the cloud server.</p> <p>CSBS can reduce the possibility of virus attack, human error deletion as well as hardware or software failure, protect data security and reliability, and reduce the risk of data tampering.</p>	

6 HUAWEI CLOUD Privacy Protection Related Certifications

HUAWEI CLOUD complies with all applicable privacy laws and regulations in the place where it operates. HUAWEI CLOUD has a professional legal team to closely monitor the update of laws and regulations, continuously track and analyze global laws and regulations, to be compliance with applicable laws and regulations.

HUAWEI CLOUD's capabilities and achievements in privacy protection and personal data security have been widely recognized worldwide. Up to now, HUAWEI CLOUD has obtained almost 20 domestic and foreign certifications from more than ten organizations, including global standard certifications related to privacy and data security and regional data security certifications.

Privacy Related Standard Certification:

- **ISO 27701**
Privacy information management system certification. The ISO 27701 certification shows that HUAWEI CLOUD has established a solid management system related to data privacy protection.
- **ISO 29151**
International practical guide to the protection of personal identity information. The adoption of ISO 29151 confirms HUAWEI CLOUD's implementation of internationally recognized management measures for the entire lifecycle of personal data processing.
- **ISO 27018**
International code of conduct focused on the protection of personal data in Cloud. The adoption of ISO 27018 indicates that HUAWEI CLOUD has met the requirements of an internationally recognized personal data protection measures of public cloud platform, and can guarantee the security of customers' personal data.
- **BS 10012**
Personal data management system standard issued by the British Standards Institute (BSI). The BS 10012 certification indicates that HUAWEI CLOUD offers a complete personal data protection system to ensure personal data security.
- **SOC Audit**
An independent audit report issued by a third party audit institution based on the relevant guidelines developed by the American Institute of Certified Public Accountants (AICPA) for the system and internal control of outsourced service providers. At present, HUAWEI

CLOUD has passed the audit of SOC 1 Type II、 SOC 2 Type II、 SOC 2 Type I and released SOC 3 report.

Data Security Standard Certifications:

- ISO 27001 Information Security Management System Certification
- ISO 27017 Cloud Service Information Security Management System
- ISO 20000 Information Technology Service Management System Certification
- ISO 22301 Business Continuity Management System
- ISO 27799 Health Information Security Management System Certification
- CSA STAR Cloud Security International Gold Certification
- PCI DSS Third-Party Payment Industry Data Security Standard Certification
- International Common Criteria (CC) EAL3+ Security Assessment Standard
- Management & Operations Stamp of Approval (M&O Program)
- NIST Cybersecurity Framework
- Payment Card Industry Three Domain Secure Certification (PCI 3DS)

Regional Security Certifications:

- Multi-Tier Cloud Security (MTCS) Level3 (Singapore)
- Certification for the Capability of Protecting Cloud Service User Data (China)
- Trusted Cloud Service (China)
- Classified Cybersecurity Protection of China's Ministry of Public Security (China)
- Gold Operations and Management certification (China)
- Cloud Service Security Certification by Cyberspace Administration of China (China)
- ITSS Cloud Computing Service Capability Evaluation by the Ministry of Industry and Information Technology (China).

7 Conclusion

HUAWEI CLOUD always adheres to HUAWEI's "customer-centric" core values, fully understands the importance of customer personal data security, and respects and protects customer privacy rights. HUAWEI CLOUD uses industry-wide security and privacy protection technologies and provides customers with capabilities through cloud services and solutions to help customers cope with increasingly complex and open network environments and increasingly strict privacy protection laws and regulations.

To satisfy the requirements of local privacy protection laws and regulations, HUAWEI CLOUD follows up on the updates of relevant laws and regulations, converting new requirements into internal HUAWEI CLOUD regulations, and optimizing internal processes to ensure that all activities carried out by HUAWEI CLOUD meet the requirements of laws and regulations. HUAWEI CLOUD continuously develops and launches privacy protection related services and solutions to help customers implement privacy protection laws and regulations in each region.

Compliance with data protection laws and regulations is a long-term and multi-disciplinary activity. HUAWEI CLOUD is committed to continuously improving capabilities in the future in order to satisfy relevant laws and regulations and to build a secure and trustworthy cloud platform for customers.

This white paper is for reference only and does not have any legal effect or constitutes a legal advice. Customers should assess their own situation when using cloud services and ensure compliance with the NDPA and other regulatory requirements when using HUAWEI CLOUD.

8

Version History

Date	Version	Description
2023-7	2.0	Routine update
2022-6	1.0	First release