EU Data Act Addendum

Preamble

This Addendum is issued in accordance with EU Data Act (Regulation (EU) 2023/2854 on harmonized rules on fair access to and use of data). It applies to Adtran's connected products and related services and is intended to comply with the pre-contractual disclosure obligations set out in Articles 3.2 and 3.3 of the Regulation.

The data holder is Adtran Holdings, Inc., located at 901 Explorer Boulevard, Huntsville, Alabama 35806, USA. Depending on the product or service, data may also be processed by Adtran Inc. (USA) and Adtran Networks SE (Germany).

1. Definitions

The definitions of terms in Article 2 of Regulation (EU) No 2023/2854 apply.
For more information on the EU Data Act you can follow this link: Go to EU legislation

2. Scope of Adtran Connected Products and Related Services

Among all the products and services provided by Adtran, multiple product categories fall within the scope of the EU Data Act and the definitions of connected products and related services. The mandatory access to data is granted for these products. For further information about specific products, please visit: https://www.adtran.com/en/products-and-services

3. Data generated during the use

The types and volume of data generated during the use of Adtran's connected products can vary depending on device type, software version, functionalities, user configurations, and usage patterns. This can include operational status data, sensor data, network performance metrics, and diagnostic information.

Users can access all data generated by their use of Adtran products, including data recorded intentionally, data generated indirectly due to user interactions or environmental conditions, data generated by user interfaces, inactivity periods, and raw data, pre-processed data, and metadata. This data is made available easily, securely, free of charge, and in a structured, commonly used, machine-readable format.

The overall volume and format of data may vary depending on the product type, features enabled, and frequency of device usage.

The following table provides further specifications for each product category:

Product Categories	Data Type	Format	Volume
Residential Solutions	Device name, MAC address, Internal IP address, End User IP Address, Account Number, DSLAM Name, Shelf/Slot/Port, End	Web interface, app or CLI	50-250 kb/day

Product Categories	Data Type	Format	Volume
	User Name, End User Email ID, End User Device ID, device type and manufacturer, serial number, WIFI SSID Names, device groups, locations, inactivity period, WIFI Data, CPU data, network data, percentages for threshold for debug and alarming.		
Business Solutions	Traffic patterns, names of connected devices, IP addresses, fault diagnostics, WIFI SSID Names, device groups, locations, inactivity period, WIFI Data, CPU data, network data, percentages for threshold for debug and alarming.	Web interface, app or CLI	50-250 kb/day
Active Line Monitoring (ALM)	OTDR insertion loss readings, system logins, alarms, wavelength, pulse width, fiber length, attenuation, signal loss, event dead zone, geographic information, DEBUG file	Excel, SOV, and DEBUG	Varies on the amount of fiber cuts detected, but usually around 100mb per month
Timing & Synchronization (Oscilloquartz)	Clock synchronization status, syslog, alarm logs, timing accuracy metrics, packet counts, diagnostic information, system health files	The format depends on the data type. Data is typically available in CSV format, while syslogs follow either RFC 3164 or a custom format. Configuration files are usually structured as key-value pairs.	• Buffer of 1,000 entries: *alarmlog*, *securitylog*, and *auditlog*. • Buffer of 25,000 entries: *probe data* and *timing statistics*. • Circular buffer (4 MB): *diagnostics file*.

Product Categories	Data Type	Format	Volume
			• Configuration file size: Depends on the number of entries; typically measured in kilobytes (KB).
Cloud Software	User name, user email ID, IP address, account number, user device ID, device type and manufacturer, device serial number and MAC address, location, DSLAM name, Shelf/Slot/Port, KV Latitude, KV longitude, network data, service provider user email address, device monitoring logs, analytics data, configuration reports, operational and diagnostic information	Intellifi® mobile app	Depending on user behavior

4. Continuous and real-time data generation

Adtran's connected products continuously generate data while in use to provide certain functionalities. Some products generate data in real-time, allowing immediate monitoring and diagnostics, while others generate data periodically or upon user interaction. This includes when you interact with your device directly, when it communicates with the network, or through the software that controls or monitors the device, such as Adtran's cloud-based management and analytics platforms.

5. Data storage location, duration and purpose

- Residential Solutions: Information is stored locally on the device for as long as the device remains connected or until credentials are changed. By default, data remains on the device and is not continuously transmitted, however it is periodically uploaded on the server. The duration is very dependent on the type of Data.

- Business Solutions: Information is stored locally. By default, data remains on the device and is not continuously transmitted, but it is uploaded periodically on the server. Information is stored locally on the device and retained for as long as the device is connected or until credentials are updated.

- Active Line Monitoring (ALM): Information is stored locally on the device. OTDR insertion loss readings are retained for approximately one year. System logs and other type of data operate on a "first-in-first-out" basis and are overwritten as new entries are created, depending on the log volume.
- Timing & Synchronization (Oscilloquartz): Some data is stored locally on the device, including alarm logs, security logs, audit logs, diagnostic files, probe data (if enabled), and timing statistics (if enabled). Additionally, if system logging is enabled or configured accordingly, most of this data can also be stored on the server, except for the configuration file and the diagnostic file, which remain stored locally. Most information is deleted upon power restart. Where information is retained, it is stored in a circular buffer, and the oldest entries are overwritten as new data is created; retention time depends on buffer size and event frequency.
- Cloud Software: Data is stored on servers, specifically on AWS (Amazon Web Services) cloud infrastructure. A Data Processing Agreement has been signed to ensure the adequate technical and organizational measures to protect data. Adtran expects to use readily available data itself for purposes such as product improvement, service delivery, network optimization, analytics, and AI/ML training. Adtran may also allow third parties (such as cloud providers or business partners) to use data, but only for purposes agreed upon with the user and under strict confidentiality and data protection terms.

6. **User rights to access, retrieval and deletion of data**

Users have the right to access, retrieve, and request deletion of data generated by their use of Adtran connected products, to the extent required by the EU Data Act and applicable data protection laws.

- Residential Solutions: End users can access data via the Intellifi® mobile app, and Internet Service Providers can use MeshView to retrieve device data. Users can delete all their information themselves directly from the app or the device.
- Business Solutions: Information is accessible to users through NCommand for monitoring and troubleshooting. Users can delete all their information themselves directly from the app or the device.
- Active Line Monitoring (ALM): Real-time access is available via a standard web browser or through Adtran Mosaic One software. Users can be added or removed through the web interface. To delete all data associated with a specific port, set the port state to "Disabled". To reset the entire device, select "Restore to Factory Settings".
- Timing & Synchronization (Oscilloquartz): Data can be accessed via the Command Line Interface (CLI), typically on Linux-based systems, allowing authorized users to view or export information. Alternatively, users can manage or delete data using graphical or web-based interfaces.
- Cloud Software: Users with accounts on Adtran's cloud platforms may request access to or deletion through the portal. Users may request deletion or return of their personal data up to 90 days after termination of the agreement. Adtran will delete remaining copies within 180 days after returning the data, unless required by law to retain it.

You may request data deletion or additional information at any time by contacting Adtran Customer Support via the https://my.adtran.com/customer/account/login/?sclink=https://supportcommunity.adtran.com/ .

Where Adtran or its cloud platforms provide user accounts, those accounts can be deleted upon request by contacting dataprotection@adtran.com or via the account-management interface of the relevant platform (if available). Upon deletion of an account, Adtran will deactivate credentials, restrict access to the associated data, and delete or anonymize personal data stored in connection with that account in accordance with applicable retention obligations. Device-level data stored locally on the connected products remains under the control of the service provider or enterprise administrator and may need to be erased manually via the device interface or reset procedures.

7. Third-party authorized access to user data

Where you choose to authorize a third party to access your data concerning your use of an Adtran connected product on your behalf, the third party can submit a request to Adtran at dataprotection@adtran.com. Adtran and the requesting third party will agree on the arrangements of such access and the authorized third party will receive access to your data, to the extent this data is available to Adtran in a way that allows us to identify you. You can see and end your authorized data transfers to third parties at any time, via Adtran's Corporate Privacy Policy page: https://www.adtran.com/de-de/about-us/legal/privacy-policy

8. User rights and complaint of infringement

If you have questions, you can contact Adtran Holdings Inc., located at 901 Explorer Boulevard, Huntsville, Alabama 35806, United States of America at dataprotection@adtran.com.
You also have the right to lodge a complaint with the relevant competent authority designated under Article 37 of the EU Data Act, in the Member State of your habitual residence, place of work or establishment.

9. Disclosure of data to third parties

Adtran may engage third parties to act as our service providers and perform certain tasks on our behalf, such as processing or storing data, including personal data generated and collected by Adtran in connection with your use of an Adtran connected product. You can learn more by visiting https://www.adtran.com/de-de/about-us/legal/privacy-policy

10. Termination of services

You may use Adtran's services for as long as you wish, unless you or Adtran terminate the service according to the Contract provisions.
For cloud software, our standard terms specify an initial term of 12 months from the effective date of your order. After this period, the contract automatically renews for successive 12-month terms unless either party provides at least 60 days' advance written notice of non-renewal. Alternative terms may be negotiated and agreed upon as needed.