Xiaomi Transparency Report

GOVERNMENT REQUESTS FOR USER INFORMATION

January 1 – December 31, 2020

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Xiaomi Corporation respects privacy rights and is committed to protecting its customer's personal data. We strive to provide secure products and services by employing industry-accepted technological and organizational safeguards and by complying with all applicable legal and regulatory requirements. Xiaomi has a well-established routine for receiving, verifying, processing, and responding to data requests from judicial departments, law enforcement agencies, and other government authorities. Our request-response system aims to ensure the safety of the personal data requested. We believe users should have easy access to details about how their personal data is managed and protected.   This report details the requests that Xiaomi received from judicial departments, law enforcement agencies and other government authorities across the globe from January 1 - December 31, 2020. We will update the transparency report every twelve months to provide the latest information.

Why do we provide transparency report?

Transparency is a fundamental principle of privacy and data protection. Xiaomi sees disclosure as a key building block of trust for its consumers. We also regard the transparency report as an important part of our privacy and data protection regime, which illustrates our commitment to provide safer products and services.

What types of requests do we receive?

Xiaomi receives a range of requests seeking assistance, information disclosure or other actions. We receive requests by way of electronic or physical documents.

1. **Government requests** vary widely. For instance, law enforcement agencies that are working on investigations may file requests. Government agencies that are examining suspected fraudulent transactions may also seek assistance. Requests may seek suspension of Mi accounts or ask us to provide IP addresses and relevant information about particular devices. In addition, requests may involve emergency situations where there are threats to the safety of individuals.

2. **Legal requests** are investigation orders, warrants, subpeonas or similar orders issued by courts in China, India, the European Union and elsewhere.

What types of personal data are requested?

Different types of requests seek various types of data. For instance, when devices are stolen or lost, law enforcement agencies generally make requests for details about customers associated with those devices or those devices' connections to Xiaomi services. In handling suspected fraudulent transactions, law enforcement agencies generally make identification-related requests about financial transactions.

How do we manage and respond to data requests?

Parties making requests are required to follow all applicable laws and regulations. Xiaomi aims to ensure that our service providers impose the same standards in receiving and responding to requests for consumer data. Our data privacy team reviews each request to determine whether it has a lawful and valid basis. Xiaomi will provide data only in response to valid requests after carefully verifying the identity of the party making the request and the legal basis for it. We do not give governments or law enforcement agencies direct access to customer data. We also do not provide any form of backdoor in any of our products or services.

We are fully aware of the data protection responsibility Xiaomi holds as an international corporation, Hence, we handle cross-border data requests with extra prudence. Cross-border data requests refer to situations in which a local public authority requests a Xiaomi entity of that country to provide a customer's personal data from another country. Such requests will be handled strictly according to applicable laws and regulations. During the reporting period (January 1 to December 31, 2020), **Xiaomi did not receive any cross-border requests.** If we receive any such requests, we will disclose them in our transparency report.

We maintain a best-in-class technical safeguards to protect data during the data transfer. If we are unable to verify the identity of the party seeking the data or if we determine that the request is excessive, unclear or without a lawful basis, we challenge or reject the request to protect the rights and privacy of our customers.

How do we count requests and responses?

This report discloses the number of requests Xiaomi received from government agencies and courts around the world. It also details how we responded to those requests.

Any request with a valid legal basis is counted as one request. Any request that we challenge or reject is not counted as an additional request. If a request is amended, it is counted as a new request. If we are asked for more than one identifier of a device, we count that as a single request. If we are asked for more than one identifier of an account, we count that as a request for one account.

We list the number of device-based requests, financial identifier-based requests, and account-based requests in this way.

How do we report requests and responses?

We report requests using the following categories:

1)   Worldwide Government Device Requests

2)   Worldwide Government Financial Identifier Requests

3)   Worldwide Government Account Requests

4)   Chinese Government Requests by Legal Process Type

If Xiaomi receives lawful requests in other categories, we will include those categories in future Transparency Reports.

How do we notify data subjects?

When we receive requests seeking personal data, we notify the customer unless we are explicitly prohibited by law, regulation, or court order from doing so. We reserve the right to make exceptions under certain circumstances, for example, when providing notice would risk injury or death to an individual.

Table 1: Worldwide Government Device Requests

Table 1 provides information about device-based requests from governments globally. For example, law enforcement agencies often make data requests when they are trying to trace lost or stolen devices as part of investigations. The countries listed are the only ones from which we have received requests.

Country	Number of Device-based Requests	Number of Devices Requested	Number of Device-based Requests Where Data Was Provided	Percentage of Device-based Requests Where Data Was Provided
China	3	808	3	100%
India	24	48	19	79%
Spain	1	1	1	100%
Sweden	1	1	0	0%

Number of Device-based Requests

This is the number of device-based requests received from a government agency seeking customer data related to specific device identifiers, such as serial numbers. We count each request received from each country and report the overall number of requests received by country.

Number of Devices Requested

This is the number of devices specified in the requests. One request may contain one or more device identifiers. We count the number of devices identified in each request received from each country and report the total number of devices specified in requests received by country.

Number of Device-based Requests Provided

This is the number of device-based requests that resulted in Xiaomi providing data. We count each device-based request where we provide data and report the total number of such instances by country.

Percentage of Device-based Requests Provided

This is the percentage of device-based requests that resulted in Xiaomi providing data. We calculate this based on the number of device-based requests that resulted in Xiaomi providing data per country compared to the total number of device-based requests Xiaomi received from that country.

Table 2: Worldwide Government Financial Identifier Requests

Table 2 provides information about financial identifier-based requests received. Financial identifier requests are based on financial identifiers such as credit or debit card. Examples of such requests include situations in which law enforcement agencies are acquiring evidence for financial fraud cases that involve Xiaomi products or services. Financial identifier-based requests generally seek details of suspected fraudulent transactions.

Country	Number of Financial Identifier-based Requests	Number of Financial Identifiers Requested	Number of Financial Identifier-based Requests Where Data Was Provided	Percentage of Financial Identifier-based Requests Where Data Was Provided
China	8	18	8	100%
France	1	577	1	100%
India	30	38	15	50%
Sweden	1	1	1	100%

Number of Financial Identifier-based Requests

This is the number of financial identifier-based requests received from government agencies seeking customer data related to specific financial identifiers, such as credit card or purchase order numbers. We count each request received from each country and report the total number of requests received by country.

Number of Financial Identifiers Requested

This is the number of financial identifiers specified in the requests. One request may contain one or more financial identifiers. For example, in a case related to a large-scale event, law enforcement may seek information related to several financial identifiers in a single request. We count the number of financial

identifiers identified in each request received from each country and report the total number of financial identifiers specified in requests received by country.

Number of Financial Identifier-based Requests Provided

This is the number of financial identifier-based requests that resulted in Xiaomi providing data in response to a valid legal request. We count each financial identifier-based request where we provide data and report the total number of such instances by country.

Percentage of Financial Identifier-based Requests Provided

This is the percentage of financial identifier-based requests that resulted in Xiaomi providing data. We calculate this based on the number of financial identifier-based requests that resulted in Xiaomi providing data per country compared to the total number of financial identifier-based requests Xiaomi received from that country.

Table 3: Worldwide Government Account Requests

Table 3 lists the number of account-based requests received. For example, law enforcement agencies conduct investigations and collect evidence based on what they suspected to be unlawful use of certain accounts. Account-based requests generally seek details of Mi accounts, such as phone numbers or IP addresses. In certain instances, customers' Mi Cloud or Mi Talk content, such as backups or contacts, are also requested.

Country	Number of Account-based Requests	Number of Accounts Requested	Number of Account-based Requests Where Only Non-Content Provided	Number of Account-based Requests Where Content Data Provided	Percentage of Account-based Requests Provided
China	161	357	131	21	94%
India	3	3	2	0	67%

Number of Account-based Requests

This is the number of account-based requests received from a government agency seeking customer data related to specific Xiaomi account identifiers, such as Mi account IDs or phone numbers. We count each request received from each country and report the total number of requests received by country.

Number of Accounts Requested

This is the number of accounts specified in the requests. One request may contain one or more account identifiers. For example, in a case related to internet fraud, law enforcement may seek information related to several accounts in a single request. We count the number of accounts identified in each request received from each country and report the total number of accounts specified in requests received by country.

Number of Account-based Requests Where Only Non-Content is Provided

This is the number of account-based requests that resulted in Xiaomi providing non-content data, such as registration information, login logs, bound devices, or transactional information. We count each account-based request where we provide non-content data and report the total number of such instances by country.

Number of Account-based Requests Where Content Data is Provided

This is the number of account-based requests that resulted in Xiaomi providing content data, such as backups or contacts. We count each account-based request where we provide content data and report the total number of such instances by country.

Percentage of Account-based Requests Provided

This is the percentage of account-based requests that resulted in Xiaomi providing either non-content or content data. We calculate this based on the number of account-based requests that resulted in Xiaomi providing data (including both non-content and content) per country compared to the total number of account-based requests Xiaomi received from that country.

Table 4: Chinese Government Requests by Legal Process Type

Tables 4 provides information regarding requests by legal process type in China. Legal process type requests include Investigation Orders and other court orders. Xiaomi has not received any valid legal process type requests from courts in other jurisdictions, hence, this report only discloses legal process type requests from the Chinese government. We will report any legal requests from foreign courts if we receive them.

Country	Investigation Order	Other Court Orders
China	16	1
Percentage of total	94%	6%

Investigation Order

An investigation order can be issued when a court or party cannot obtain evidence a litigant needs to proceed in a lawsuit. With court approval, an investigation order can be used to collect evidence from relevant entities or individuals.

Other Court Orders

A court order is a document issued by the court in either a criminal or civil case when there are reasonable grounds to believe that the information sought is relevant to an ongoing investigation or similar legal proceeding.

Percentage of total

This measures the percentage of requests by legal process type. We calculate this based on the number of legal process types compared to the total number of requests received by Xiaomi.