

## Incedo Lite / Access Portal Lite

12/09/2025 – Version 1

Experience a safer  
and more open world

### **Manufacturer / Service provider:**

Impro Technologies, 1 Manchester Rd, New Germany, Durban, 3610, South Africa

## **1. Introduction**

### **1.1 General**

This information notice explains how data generated by, or collected through, the Incedo Lite and Access Portal Lite Access Control System (the "**Product**") is accessed, used, and shared (via the Access Portal Firmware Upgrade Utility (the "**Service**")) and how the data is otherwise processed, in line with the requirements under Article 3 of the EU Data Act.

### **1.2 Product and service description**

Incedo Lite / Access Portal Lite is an access control system containing hardware (HW) and software (SW) for managing and restricting access to physical locations to only authorized individuals and assets. It uses authentication methods like key cards and pin codes to verify the identity and associated access permissions for each person or asset. The system operates on premise. During usage of the system, data is generated by the HW and the SW, consisting of audit trails, events and technical logs.

### **1.3 Data holders**

The following parties receive data from the Product and/or the Service and may use the data for their own purposes ('data holders'):

- Incedo Lite / Access Portal Lite System Owner / End User

### **1.4 Terms of use and quality of service**

Incedo Lite / Access Portal Lite has an End User License Agreement which can be found during the installation process, or after installation within the service install files.

## 2. Data which the Product is capable of generating

Product name	Nature of data	Format	Estimated volume	Collection frequency	Data retention
Controller	Access transactions,  status transactions,  alarm transactions,	.log (txt ), CSV	1 MB per day is typical per 100 credential holders, per system	The product generates data continuously and in real-time, while users are entering and exiting access points managed by the controller.	The product stores data on the device. Data on the device is retained until buffer overruns.

## 3. Data obtained by the Service

Service name	Nature of data	Format	Estimated volume	Data retention
Firmware Upgrade Utility	Tagholder and system configuration backup	Text file	Assuming 100 credential holders:  100 MB for initial setup  1 MB per day is typical, per system	Data generated by the Firmware Upgrade service is stored on the device running the service indefinitely.

## 4. Data access and user capabilities

Direct access to data	Indirect access to data	Erasure of data
The Incedo Lite / Access Portal Lite embedded web-page provides several reports that expose data collected by the system to the system owner.  The backup text file generated by the Firmware Upgrade Utility	N/A	Data stored on the controller can be erased by factory resetting the controller.

## **5. How to request data sharing**

If you would like to share the data generated by your system with a third party, you can do so at your discretion.

## **6. Right to lodge a complaint**

If you believe our handling of your data infringes your rights under applicable legislation, you have the right to lodge a complaint with the competent authority in your jurisdiction.

## **7. Trade secrets**

In some cases, data from the connected products or related services may include trade secrets that we or our partners own. Trade secrets shall be preserved and disclosed only where all necessary measures prior to preserving their confidentiality are taken, in particular regarding third parties. In exceptional circumstances, our ability to grant access to data may be limited due to trade secrets.

We maintain confidentiality obligations to protect any trade secrets contained within your data.

## **8. Term and termination**

Where Impro Technologies provides a hosting service, your contract with us is typically provided on an annual rolling basis, beginning on the date you sign up or otherwise agree to the Terms of Use of the Service, however, please refer to your agreement for the exact term.

You may end the contract by following the steps set out in the termination clause of your agreement.

## **9. Contact information**

Should you have any questions regarding the data generated by the Product or the Service, do not hesitate to contact us at [support@impro.net](mailto:support@impro.net).