EU Data Notice



SMARTair / TESA Hotel Ecosystems

05/09/2025 - Version 1

Experience a safer and more open world

Manufacturer / Service provider:

Talleres de Escoriaza S.A.U. Barrio de Ventas 35, 20305, IRUN, Spain

1. Introduction

1.1 General

This information notice explains how data generated by, or collected through, the TESA SMARTair UOC, BLE and WIR Door Devices (the "**Product**") is accessed, used, and shared (including TESA SMARTair TS1000 / TESA Hotel Software + Web Manager, TESA SMARTair Openow App and TESA SMARTair App (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

TESA SMARTair and TESA Hotel are access control solutions based on electronic devices installed on the building's doors. Both systems use RFID credentials and mobile phone credentials for user identification, ensuring secure and contactless authentication. Access rights management is carried out through a centralized software platform, enabling precise definition, monitoring, and administration of access to every controlled entry point within the building. Data is generated as the products are used, and the data is hosted on-premise.

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'):

 TESA SMARTair / TESA Hotel system owner, typically the final customer and end user.

The system can also be integrated with third-party platforms such as building management systems or booking systems. In such cases, TESA SMARTair / TESA Hotel may share certain information with the third party. The system owner determines what information is shared and for what purpose.

1.4 Terms of use and quality of service

All TESA SMARTair / TESA Hotel services have End User License Agreements and Privacy Statements which can be found during installation or after installation within the service itself.

2. Data which the Product can generate:

| Product name | Nature of data | Format | Estimated volume | Collection frequency | Data retention |
|--|---|-----------------------------------|---|--|--|
| TESA SMARTair UOC Door Devices | Activity logs, battery status | Embedded proprietary format | Each time a user presents their credential (RFID or mobile phone credential) to the door device, the system records the generated event, which is ~11bytes per event. The hardware stores up to 1,200 events using the FIFO (First In, First Out) method, resulting in a maximum of ~13.2kbytes | These records must be manually retrieved using the portable programmer. And must be download manually from the portable programmer to the TESA SMARTair TS1000 / TESA Hotel + Web Manager on premise server | Events are stored on the door device until overwritten using the FIFO method |
| TESA SMARTair BLE (Openow) Door Devices | Activity logs, battery status | Embedded proprietary forma | Each time a user presents their credential (RFID or mobile phone credential) to the door device, the system records the generated event, which is ~11bytes per event. The hardware stores up to 1,200 events using the FIFO (First In, First Out) method, resulting in a maximum of ~13.2kbytes | When the mobile credential is presented, the door device sends also the events to the TESA SMARTair Openow app, which transfers them to the TESA SMARTair TS1000 or TESA Hotel + Web Manager on premise server | Events are stored on the door device until overwritten using the FIFO method |
| TESA SMARTair WIR Door Devices | Activity logs, battery status, connectivity logs, diagnosis data. | Embedded proprietary format | Each time a user presents their credential (RFID or mobile phone credential) to the door device, the system records the generated event, which is ~11bytes per event. The hardware stores up to 1,200 events using the FIFO (First In, First Out) method, resulting in a maximum of ~13.2kbytes | Door device events are sent in real time to the communication HUB, which forwards them to the TESA SMARTair TS1000 or TESA Hotel + Web Manager on premise server | Events are stored on the door device until overwritten using the FIFO method |

3. Data obtained by the services:

| Service name | Nature of data | Format | Estimated volume | Data retention |
|---|--|---|---|---|
| TESA SMARTair TS1000/TESA Hotel Software + Web Manager | Users, doors, time schedules, access rights, RFID credentials, mobile phone credentials (Openow), Alerts/notification logs, user interactions logs, diagnostic logs, device data, performance data | SQL Data fields and EXCEL, CSV when exporting the Activity log from the software | Volume will be very different from one installation to another. It will depend on number users, doors, number of openings per day, etc. The information in table 2 above provides a guide on the volume of data per product | Indefinitely but also period can be set by the system manager |
| TESA SMARTair Openow App | User's credential, activity logs, battery status | Embedded proprietary. 11bytes per event | TESA SMARTair Openow App can collect up to 200 events each time, with each event being 11 bytes, resulting in a maximum of 2.2kbytes | Data won't be stored in the Openow App. It is transferred to the on-premises server where the TS1000 / TESA Hotel are installed |
| TESA SMARTair App (Remote opening) | None | n/a | n/a | n/a |

4. Data sharing and use

| Type of data | Data use | Sharing of data | Identity of data recipient |
|--|---|---|--|
| Users, doors, time schedules, access rights, RFID credentials, mobile phone credentials (Openow), Alerts/notification logs, user interactions logs, diagnostic logs, device data, performance data, etc. | The system owner determines what information is shared and for what purpose | The TS1000 / TESA Hotel software can only share data with third parties if this feature is included in the license. The data is shared via API's or TCP/IP commands | Data can be shared with third-party platforms such as building management systems or booking systems, selected by the system owner |

5. Data access and user capabilities

| Direct access to data | Indirect access to data | Erasure of data |
|---|-------------------------|---|
| The system manager assigns operators, sets their credentials, and defines the data they can access and the actions they can perform | n/a | The system manager can store or delete data at any time |

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

Your End User License Agreement for the Service is valid for the duration you use the Service, beginning on the date you sign up or otherwise agree to the Terms of Use of the Service.

If you purchase an additional Openow App license, this element of the Service is provided on an annual rolling basis.

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 Smartair.techsupport@assaabloy.com.