

Manufacturer / Service provider:

ASSA ABLOY Opening Solutions Hungary Kft. / Seawing
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1. Introduction

1.1 General

This information notice explains how data generated by, or collected through, the SC-1000 Controller (the "**Product**") is accessed, used, and shared (including to provide Incedo™ Pro (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™ Pro is an on-premise Electronic Access Control (EAC) System. It configures, controls and manages the SC-1000 controllers, the core hardware of the EAC. SC-1000 can provide controlled access controlling different types of gates (turnstiles, speed gates, doors with electric locks etc.) You can manage user access through Incedo™ Pro and monitor the events provided by the system. The SC-1000 controllers are connected to the SiSCom communication service. This service collects data from the controllers and stores them in a central SQL database. Users can access this database through Incedo™ Pro clients.

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'):

- The system owner/customer (who owns the system licence)

If the customer has a REST API interface licence, then the customer can share a well-defined part of the generated data with a third party.

1.4 Terms of use and quality of service

The terms of the Service are set out in the License Agreement, and details of the quality of the Service within the user manual.

2. Data which the Product is capable of generating

Product name	Nature of data	Format	Estimated volume	Collection frequency	Data retention
SC-1000 controller	User interactions (card read, biometric identification, PIN usage), gate events and status changes, other system status change events, tamper report/status, battery status, AC status (power supply)	The data is stored on board of the SC-1000 in an SQL database. Incedo™ Pro gets this data from SC-1000, and you can export it in different popular formats like Excel, Word document, text, csv etc.	The amount of data generated is typically in the 1–10 Mbyte / day range.	Data is generated each time an event occurs. The Service monitors the communication state periodically, typically every 5 minutes.	Data is retained indefinitely, but the event number has a maximum value of 100,000 events as the standard setting.

3. Data obtained by Incedo™ Pro

Service name	Nature of data	Format	Estimated volume	Data retention
Incedo™ Pro	It stores all the data generated by the SC-1000 controllers + personal data (name, photo etc.) and some logs of the communication activities of the different subsystems. System change/action logs. System-generated logs e.g. crash/bugs, automated processes e.g. time synchronisation	On board SQL database JSON, XML, jpeg, string	The amount of data depends on the system size. Systems generally range between 1–2 gigabytes to 100 gigabytes.	Retention periods vary depending on the type of data. Most data are retained indefinitely, until the storage is overwritten, however a user can set a customised retention period. For diagnostic logs the user can delete the files and set a customised retention period. Where personal data is generated or processed, it is retained between 1 day and 6 months depending on how retention periods are defined by the user.

4. Data sharing and use

Type of data	Data use	Sharing of data	Identity of data recipient
You can share entry/exit events of persons with a third party.	The shared data can be further processed, for example, in a time & attendance service.	Incedo™ Pro has a standard REST API interface called SiSConnect. Third parties can use this to get relevant information.	The system owner/customer administers access to their system via SiSConnect and therefore is aware of third parties receiving data via SiSConnect.

5. Data access and user capabilities

Direct access to data	Indirect access to data	Erasure of data
Incedo™ Pro client has several functions to retrieve information regarding the data generated in the SC-1000 controller. The most detailed is LIST/Event list & log file function. You can access it from the Main screen selecting the LIST tab and pressing the Event list & log file button.	n/a	You can erase all data by performing a factory reset, as described in the SC-1000 Technical Reference Manual. You can maintain the data stored in Incedo™ Pro by the event maintenance job. You can manage this and other task in the main screen SYSTEM tab/ Task Manager function. This task can be used to delete the obsolete data from the database periodically.

6. How to request data sharing

You may request us to share data with a specific third party through the SiSConnect REST API interface provided by Incedo™ Pro. We may under certain circumstances deny a request of data sharing to third parties.

You should provide a special user account to allow access to SiSConnect. The account can be disabled at any time.

7. 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.

8. 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.

9. Term and termination

The License Agreement to use Incedo™ Pro is an annual subscription, beginning on the date you sign up or otherwise agree to the License.

You may end the License by following the steps as set out in the termination clause of the License.

10. 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.seawing@assaabloy.com