

Roger – ADL-2 door lock & supporting mobile apps

11/09/2025 – Version 1

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Manufacturer / Service provider:

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1. Introduction

1.1 General

This information notice explains how data generated by, or collected through, the ADL-2 door lock (the "**Product**") is accessed, used, and shared [(including to provide Roger MDM & Roger PIN Generator mobile apps (the "**Service**"))] and how the data is otherwise processed, in line with the requirements under Article 3 of the EU Data Act.

The following abbreviations are used in the document:

- **AT:** Audit Trail - is a record of chronological events or actions that occurred in given device (product).
- **EVL:** Event Log - is a chronological record of application events which is created automatically during software use and whose main purpose is to help identify and eliminate software faults.
- **APL:** Application (software) Log - is a chronological record of application events which is created automatically during software use and whose main purpose is to help identify and eliminate software faults.
- **EPDF:** Embedded Proprietary Data Format - Embedded Proprietary Data Format is a data format that does not conform to any standard data format and is created by the software developer/architect. Decoding data stored in the EPDF format requires knowledge of the specific format's syntax and data encoding method. In most cases, decoding data in the EPDF format requires the use of dedicated software and/or have specific knowledge.
- **N/A:** Not Applicable
- **DB:** Database

1.2 Product and service description

The ADL-2 electronic lock consists of two metal escutcheons integrated with handles. The external escutcheon has a built-in electronic reader with a keypad, which enables electronic access control. ADL-2 grants access upon entering a PIN code, reading a proximity card or use of a mobile app. Access codes can be generated through RPG (Roger Pin Generator) Mobile App. The AT generated by the ADL-2 is mainly related to access type events on a controlled door. In addition to it, ADL-2 registers some events related to its condition and faults. The lock is operated using the Roger MDM mobile app, which, in addition to lock's configuration, enables reading of AT saved in the lock's memory and programming

of the proximity access cards. ADL-2 lock can be installed on the most doors while retaining the existing internal mortise lock and cylinder. The lock's cylinder can be used for mechanical door locking or emergency door opening. Thanks to the remotely generated codes, the lock is particularly suitable for short-term rental apartments. For integration purposes, an SDK is available that allows you to generate remote PIN codes from third party systems. Data is stored on-premise by the system owner/customer.

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"):

- System owner/customer

1.4 Terms of use and quality of service

All Roger services have Software User License Agreements and General License Terms and Conditions which can be found during installation, after installation within the service itself or at the www.roger.pl.

2. Data which the Product is capable of generating

Product name	Nature of data	Format	Estimated volume	Collection frequency	Data retention
ADL-2 Door Lock	AT: Yes EVL: No APL: No	EPDF: 16B	4kB (255 entries)	Product is capable of generated data continuously and in real time. The HW uses a circular buffer (first in, first out, FIFO) with up to 255 entries.	Events are stored until overwritten due to buffer capacity (FIFO). No other retention policy implemented.

3. Data obtained by Service provider

Service name	Nature of data	Format	Estimated volume	Data retention
RMDM Mobile App Mobile app for configuration and maintenance of ADL-2 lock.	AT: Yes EVL: No APL: No	N/A because RMDM doesn't store data.	AT: RMDM downloads AT from the lock and displays it on the mobile device screen. No data is stored in the device memory – it can be solely displayed.	N/A because RMDM doesn't store data.
RPG Mobile App Mobile app enables generation of PIN codes for ADL-2 lock.	AT: No EVL: No APL: Yes	EPDF: 100B	APL: Text file. Size not limited.	No retention policy implemented. No time limit for retention.

4. Data access and user capabilities

Direct access to data	Indirect access to data	Erasure of data
The system owner has direct access to data through the provided service.	N/A	The owner/user can delete data using the features available in the software and/or device. Data deletion does not require contacting the device/system provider or any other third party including manufacturer.

5. How to request data sharing

You may request us to share data with a specific third party by contacting our support organization via email (see 9). We may under certain circumstances deny a request for data sharing to third parties.

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.

8. Term and termination

The terms of use for Roger's services are defined in the General License Terms and Conditions and, where applicable, in a separate Licensing Agreement. Acceptance of these terms is required at the time of installation. Where no separate Licensing Agreement is provided, the General License Terms and Conditions constitute the sole legal basis for the use of the license.

You may end the contract by following the steps set out in Article 9 of the General License Terms and Conditions.

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@roger.pl.