

Roger – CPR32-SE system controller & PR Master software

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 CPR32-SE system controller (the "**Product**") is accessed, used, and shared [(including to provide PR Master PC software (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 CPR32-SE is an optional network controller used in RACS 4 access control system equipped with PRxx1 series and PRxx2 series controllers. The network controller enables enhancement of RACS 4 access control system with the following functionalities:

- events recording in central memory buffer,
- configuration of anti-passback zones (Global APB) in access control system,
- concurrent arming/disarming of access controllers within particular Alarm Zone,

- configuration of schedules and calendars (concerns PRxx1 series controllers).

The network controller is equipped with RS485 port which is used for direct communication with access controllers and for communication with computer (PR Master software) using communication interface. Events from the access control system are stored in an internal memory buffer (max. 240,000 events).

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
CPR32-SE access system network controller	AT: Yes EVL: No APL: No	EPDF: 8B	2MB (245,749 entries)	Product is capable of generating data continuously and in real time. The HW uses a circular buffer (first in, first out, FIFO). If the product is online the AT is continuously transferred to the software.	Events are stored until overwritten due to buffer capacity (FIFO). No other retention policy implemented. Once the power is off event buffer is cleared.

3. Data obtained by Service provider

Service name	Nature of data	Format	Estimated volume	Data retention
PR Master software PR Master enables RACS 4 access system configuration, user management, event monitoring and system commanding.	AT: Yes EVL: No APL: No	EPDF: 100B EVL: N/A APL: N/A	This is dependent on system size as smaller systems create less amount of data compared to larger systems. AT: PARADOX DB; database size is not limited.	AT: No retention policy implemented. No time limit for retention.
RCP Master 4 software RCP Master 4 software is an optional element of access control system and enables time and attendance analysis, worktime billing, and providing payroll data.	AT: Yes EVL: No APL: Yes	AT: EPDF: 1kB EVL: N/A APL: EPDF; <1kB	This is dependent on system size as smaller systems create less amount of data compared to larger systems. AT: MS SQL DB; database size not limited. APL: The size of Log.txt file not limited.	AT: No retention policy. No time limit for retention. APL: No retention policy. No time limit for retention.
RCP Master Web software RCP Master 4 Web is an additional module for the RCP Master 4 system, which enables employees to access selected functions of the RCP system via a web browser.	AT: Yes EVL: No APL: Yes	AT: EPDF; 1kB EVL: N/A APL: EPDF Txt: 0,5kB	This is dependent on system size as smaller systems create less amount of data compared to larger systems. AT: MS SQL DB; database size not limited. APL: The size of Log.txt file not limited.	AT: No retention policy. No time limit for retention. APL: No retention policy. No time limit for retention.

4. Data access and user capabilities

Direct access to data	Indirect access to data	Erasure of data
For all services: 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.