

Roger – MC16 controllers & RACS 5 system 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 MC16 access controllers (the "**Product**") is accessed, used, and shared [(including to provide VISO 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

MC16 is an access and building automation controller and is dedicated to RACS 5 access control system. Controller is offered in multiple versions, and its functionalities are determined by license file on its memory card. The MC16 is offered as individual controller or within MC16-PAC-KIT which facilitates the installation and design of RACS 5 system. After the connection of MCT readers and MCX expanders, the controller can be applied in access control, Time & Attendance, hotel and building automation. The MC16 can control doors, elevators, lockers (cabinets) and car parks. The controller offers advanced and efficient methods for management of users and their authorizations (rights). The configuration of controllers in a system is performed concurrently via LAN and the

total number of controllers does not affect configuration time. The controller is managed with VISO software which enables operation with centralized Microsoft SQL Server database. The system can be managed from multiple workstations with VISO software by operators with various rights. The communication with MC16 controllers in LAN is encrypted using AES128 CBC method. During operation controller continuously collects and stores in its internal memory banks events related to its operation. The AT generated by the controller is mainly related to access type events on a controlled door. In addition to it, controller registers some events related to its condition, faults, inputs and outputs state. When controller is online with supporting software it continuously transfers AT to the PC database. 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
MC16 access controller and derivatives: <ul style="list-style-type: none"> • MC16-AZC • MC16-BAC • MC16-HRC • MC16-LRC • MC16-PAC • MC16-SVC 	AT: Yes EVL: None APL: Optional. Requires owner/customer consent.	AT: EPDF; 128B APL: EPDF; 128B	AT: 1GB APL: Up to 31 files 16MB in size.	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.	AT: Events are stored on SD card until overwritten due to buffer capacity (FIFO). No other retention policy implemented. APL: Device can create up to 31 files until the first is overwritten by new data (Circular buffer). No time-related retention policy.

3. Data obtained by Service provider

Service name	Nature of data	Format	Estimated volume	Data retention
<p>RACS 5 software package:</p> <ul style="list-style-type: none"> VISO Windows VISO Web <p>VISO Windows enables RACS 5 access system user management, event monitoring and system commanding.</p>	<p>AT: Yes</p> <p>EVL: Yes</p> <p>APL: Yes</p>	<p>AT: EPDF; 1,8kB</p> <p>EVL: EPDF; 1,8kB</p> <p>APL: EPDF; 150B</p>	<p>This is dependent on system size as smaller systems create less amount of data compared to larger systems.</p> <p>AT: MS SQL DB; database size not limited.</p> <p>EVL: MS SQL DB; database size not limited.</p> <p>APL: up to 7 files 50MB each.</p>	<p>AT: No retention policy.</p> <p>EVL: No retention policy.</p> <p>APL: Max. 350MB. APL data is overwritten, when max size is reached. No time-related retention policy.</p>
<p>Viso Mobile</p> <p>Mobile app allows access system user management, system commanding and event auditing of RACS 5 system.</p>	<p>AT: Yes</p> <p>EVL: Yes</p> <p>APL: No</p>	<p>AT: EPDF; 1,8kB</p> <p>EVL: EPDF; 1,8kB</p>	<p>This is dependent on system size as smaller systems create less amount of data compared to larger systems.</p> <p>AT and EVL are retrieved from the RACS 5 DB server.</p>	<p>N/A - no data is kept on the mobile device.</p>
<p>RCP Master 4 software</p> <p>RCP Master 4 software is an optional element of access control system and enables time and attendance analysis, worktime billing, and providing payroll data.</p>	<p>AT: Yes</p> <p>EVL: No</p> <p>APL: Yes</p>	<p>AT: EPDF; 1kB</p> <p>EVL: N/A</p> <p>APL: EPDF; <1kB</p>	<p>This is dependent on system size as smaller systems create less amount of data compared to larger systems.</p> <p>AT: MS SQL DB; database size not limited.</p> <p>APL: The size of Log.txt file not limited.</p>	<p>AT: No retention policy. No time limit for retention.</p> <p>APL: No retention policy. No time limit for retention.</p>

Service name	Nature of data	Format	Estimated volume	Data 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.