

Data Information Notice

ASSA ABLOY
Opening Solutions

Information notice for Clex prime lock family
(CX6120, CX6130, CX6140, CX6160, CX6170)

23/01/2026

Experience a safer
and more open world

Manufacturer / Service provider:

Uhlmann & Zacher GmbH, Gutenbergstraße 2-4, 97297 Waldbüttelbrunn

1. Introduction

1.1 General

This information notice explains how data generated by, or collected through, the Clex prime lock family (the “**Product**”) is accessed, used, and shared (including to provide Keyvi administration software, UZ Keyhub (cloud-hosted), Clex Key App, ClexFWProg (mobile app), ClexTouch software PC (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

Clex prime lock family (CX6120, CX6130, CX6140, CX6160, CX6170) is a global platform for access management. The product generates audit trails (credential type, credential ID or IDs—without matching user names), event logs (major device events except card read activities), diagnostic counters, battery status, and sensor or operation alarms on the lock circuits. Data is collected during operation and stored on-device, on user access cards, in a locally installed database, and temporarily on ClexTouch service software for transfer to the local database. Audit trails are stored indefinitely until overwritten by newer records.

1.3 Data holders

Clex systems are hosted on-premise by the system owner/customer. Therefore the system owner is the only party which has access to the data generated.

1.4 Terms of use and quality of service

The latest version can be found online at the address:
<https://uundz.com/verkaufs-und-lieferbedingungen>

2. Data which the Product is capable of generating

Product name	Nature of data	Format	Estimated volume	Collection frequency	Data retention
Clex prime lock family (CX6120, CX6130, CX6140, CX6160, CX6170)	Audit trails (credential type, credential ID or IDs), event logs (major device events except card read activities), diagnostic counters, battery status, sensor/operation alarms	Byte array, machine readable only	Audit trail entries: 8 Bytes each, up to 512 entries on a first-in, first-out (FIFO) basis; counters transferred on demand	Data is generated continuously and in real-time	Audit trails are stored indefinitely until overwritten by newer records

3. Data obtained by Service

Service name	Nature of data	Format	Estimated volume	Data retention
Keyvi Administrator	Activity log, door event logs, Keyvi service event log	File-based database format	420 kB (activity), 128 bytes (door), 820 bytes (service) per entry	Default: indefinite; automatic deletion may be configured in days
UZ Keyhub	Phone numbers, device type/operating system/model	JSON / structured cloud record	1 record per mobile device	Phone number: one-time; Device data: upon key change
Clex Key App	Access attempt event log, syslog	Byte array (events), text log (syslog)	20 bytes (event), 50 kB (syslog)	Events stored per attempt; Syslog retained until user deletes or reinstalls app
ClexFWProg	Update logs	XML (gzipped)	approx. 3,000 bytes per update (XML, gzipped)	Stored only during manual update; deleted automatically after transfer
ClexTouch Software PC	System log (user activities)	Plain text	60 bytes per entry	Stored locally until log rotation or user deletion

4. Data access and user capabilities

Direct access to data	Indirect access to data	Erasure of data
Users can access audit trails and event logs directly via configuration tools, mobile apps, or PC software	N/A – Uhlmann & Zacher is not a Data Holder. The system owner is the data holder.	Users can erase product data by factory resetting the device or deleting data via the service software

5. How to request data sharing

As data generated by the Service is managed directly by the system owner/customer or their access control system provider, they are able to access the data generated directly, as described above, and share it with a third party at their discretion.

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 preserve 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

Your agreement to use the Service begins on the date you agree to the Terms of Use of the Service and is valid for the period you use the Service. You may end the contract by following the steps set out in the termination clause of your Terms of Use.

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 order@uundz.de.