

# Data Information Notice

**ASSA ABLOY**  
Opening Solutions

Information notice for Clex private lock family  
(CX2120, CX2130, CX2140, CX2160, CX2170)

23/01/2026

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## **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 private lock family (the “**Product**”) is accessed, used, and shared (including to provide ClexFWProg, Keyng App, Keyng Software, Clex Key App, ClexTouch, (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 private lock family (CX2120, CX2130, CX2140, CX2160, CX2170) 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 the smartphone or PC of the locking system administrator. 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 private lock family (CX2120, CX2130, CX2140, CX2160, CX2170)	Audit trails (credential type, credential ID or IDs - without knowing the matching user name), Event logs including major device events except card read activities, several counters of diagnostic data, battery status, sensor or operation alarms on the lock circuits.	byte array, machine readable only	Audit entries: 16 bytes each on a first-in, first-out (FIFO) basis, up to 512 entries; counters stored on device, transferred on demand	Data is generated continuously and in real-time	Audit trails on the locks are stored indefinitely until they are overwritten by newer records.

### 3. Data obtained by Service

Service name	Nature of data	Format	Estimated volume	Data retention
Clex SCT	System log (user activities, errors, imports)	Text log (approx. 250 bytes/entry)	Approx. 250 bytes per entry	Retained until user deletes or log rotation occurs
ClexFWProg	Update logs	XML (gzipped)	Approx. 3,000 bytes per update (XML, gzipped)	Stored only during manual update; deleted after transfer
Keyng App	System log, event/access log of the product	Byte array (events), text log (system log)	50 bytes (system log), 20 bytes (event)	Retained until user deletes or reinstalls app
Keyng Software	System log, event/access log of the product	Plain text	50 bytes (system log), 20 bytes (event)	Stored locally until user deletes or log rotation occurs
Clex Key App	Event log of access attempts, system log with technical details	Byte array (event), text log (system)	20 bytes (event), 50 kB (system log)	Event logs per attempt; system logs until deletion or reinstall

### 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.

## **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](mailto:order@uundz.de).