

## ABLOY CUMULUS

04/09/2025 – Version 1

Experience a safer  
and more open world

### **Manufacturer / Service provider:**

Abloy Oy, Wahlforssinkatu 20, 80100 Joensuu, Finland

## **1. Introduction**

### **1.1 General**

This information notice explains how data generated by, or collected through, the ABLOY CUMULUS Keyless product family (the “**Product**”) is accessed, used, and shared (including to provide ABLOY CUMULUS mobile application and SDK (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**

ABLOY CUMULUS operates by having a locking device communicate via BLE (Bluetooth Low Energy) with a mobile application, which then transmits the relevant lock event data to the cloud. We have a platform as a service approach, including mobile application, SDK (software development kit) and APIs (application programming interface) for cloud integrations. Cumulus allows users to track and manage lock access for security and operational purposes. The information ensures that only authorized users have access to specific areas. The main purpose of the data collection is to manage and monitor lock access events, ensuring security and operational efficiency. Data is generated as the locks are used, which can be stored both on the product and in the ABLOY CUMULUS cloud.

### **1.3 Data holders**

Abloy Oy as the Service Provider is the Data Holder.

## 2. Data which the Product is capable of generating

Product name	Nature of data	Format	Estimated volume	Collection frequency	Data retention
ABLOY CUMULUS Keyless product family. (Keyless Padlocks – PLK340 & PLK348, Controller EK900, Key Deposit CYK191, Swing handle	Audit trails (Operating device ID, event type (open/close and timestamp), system events example temperature and event logs, battery status, battery voltage	All device data is in JSON log format	Data is generated each time a locking device is used.  On average, we collect 15 log entries of 512 bytes each per lock opening event, totalling approximately 7.6 KB.  Example data if there are 1000 openings a day, 1000 x 15 events x 512 Byte/per event = 7,8 MB / day.	Data is generated continuously and in real-time by the locking product. Data is shared via mobile phone or Gateway device to platform.	Intended retention time is 3 years of data creation and when our cloud has received the data.  If the device is fully offline and no one visits it, the data which was generated in this offline period is stored in the device's memory, where Data Retention is 20 years.

## 3. Data obtained by Abloy OY

Service name	Nature of data	Format	Estimated volume	Data retention
Mobile Application / Software development kit (SDK) & CLOUD / Application programming interface (API)	Audit trails (Operating device ID, event type (open/Close/update), timestamp, system event logs, battery status, battery voltage, temperature. We collect also Diagnostic, usage and performance data from Mobile clients.	All device data is in JSON log format	On average we collect 15 log entries x 512 Bytes per opening event of a lock, in total about 7,6 Kb  For example, if there are 1,000 openings per day, this results in approximately 7.8 MB of data daily (1,000 x 15 events x 512 bytes per event).	30 days hot storage  3 years cold storage

## 4. Data sharing and use

Type of data	Data use	Sharing of data	Identity of data recipient
Audit trails (Operating device ID, event type (open/Close/update), timestamp, system event logs, battery status, battery voltage, temperature. Also Diagnostic, usage and performance data from Mobile clients can be shared.	To identify aspects of the Service which could be improved, ensure quality  To be able to analyse and test our Service by doing research, collect surveys and producing statistics, crash analytics	This data is not shared to third parties outside of ASSA ABLOY by Abloy Oy	N/A

## 5. Data access and user capabilities

Direct access to data	Indirect access to data	Erasure of data
<p>All the data which are designed to be retrievable is available from our API Callbacks. This includes:</p> <ul style="list-style-type: none"> <li>- Audit trails: who did what?</li> <li>- System Events: log events generated by locking device telling details of what happens.</li> </ul> <p>Guidance and support on how to retrieve data via the API is provided from our technical support team as part of system integration processes.</p>	<p>To access:</p> <ul style="list-style-type: none"> <li>• diagnostic data, usage and performance data from mobile application.</li> <li>• Battery voltage level or temperature of a locking product at a given time.</li> </ul> <p>Please make a request to the customer support team by emailing <a href="mailto:dataact@abloy.com">dataact@abloy.com</a></p>	<p>At this time data generated by an individual product cannot be erased, however the audit trails of a full system can be at the request of the system owner. For further information, please contact Abloy Services at <a href="mailto:dataact@abloy.com">dataact@abloy.com</a></p>

## 6. How to request data sharing

You may request us to share data with a specific third party via our customer support team by emailing [dataact@abloy.com](mailto:dataact@abloy.com). We may under certain circumstances deny a request for data sharing to third parties.

## **7. 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.

## **8. 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. We maintain confidentiality obligations to protect any trade secrets contained within your data.

## **9. Term and termination**

Your contract with ABLOY CUMULUS is valid for an annual subscription beginning on the date you sign up or otherwise agree to the Terms of Use of the Service.

You may end the contract by contacting our Customer Support team, who will advise you of the steps for terminating your agreement.

## **10. Contact information**

Should you have any questions regarding the data generated by the Product or the Service, do not hesitate to contact us at [dataact@abloy.com](mailto:dataact@abloy.com).