

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 OS Controller (the "**Product**") is accessed, used, and shared (including to provide ABLOY OS software set out in section 3 below (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 OS is an access control system offering e.g. key, tag, and mobile access management under one platform provided as a service or as a local installation. ABLOY OS can be used to manage various locking products, and it is accessed using an internet browser.

A centralized server is connected via IP connections to door controllers. Controllers collect data on door access (e.g., which door, when, and with which credential) and share it with the centralized server. Data is stored long-term on the server and short-term on the controller.

1.3 Data holders

The following parties receive data from the Product and may use the data for their own purposes ('data holders'):

- The system owner / customer
- Where Abloy Oy provide data center services, it is also a data holder.

ABLOY OS also offers integration capabilities to 3rd party systems. The user can identify such 3rd parties as integrations are enabled only when specifically requested by the user.

ABLOY OS can be integrated with other products offered from the ASSA ABLOY Group, which include:

- CLIQ
- ABLOY CUMULUS
- Aperio

Data Act information for these products can be found at
<https://www.assaabloy.com/group/emeia/campaigns/eu-data-act>

1.4 Terms of use and quality of service

ABLOY OS service description and End User License Agreement (EULA) are provided and need to be accepted before ordering the software.

2. Data which the Product is capable of generating

Product name	Nature of data	Format	Estimated volume	Collection frequency	Data retention
ABLOY OS controller	Access log, circuit log and alarm log. e.g. circuit information contains the door open/closed info. The alarm log is filled if the door is open for longer than the given time limit.	custom plain text file	Data is generated in real time and transmitted to the server. The size of the log is limited by the available memory of 24 MB on the device. Size depends on the number of daily events. Estimated size 0,2-4 MB per day.	Data is generated and collected in real time.	Offline events can be stored for 2 weeks, and after that, the controller will prevent access. The log is cleared every day if it is successfully sent to the ABLOY OS software. Data is stored indefinitely if the events are not successfully sent.

3. Data obtained by the Services

Service name	Nature of data	Format	Estimated volume	Data retention
ABLOY OS FSES	Audit logs based on actions, access log, circuit log and alarm log. e.g. circuit information contains the door open/closed information. The alarm log is filled if the door is open for longer than the given time limit.	SQL database	Volume depends on the amount of usage. In a typical system, one connected product generates 200 KB of data daily.	Data on the product is stored until it has been transmitted to the connected service. Once the data is transmitted, it is cleared from the product daily. On the connected service, the data is stored for 186 days as default.
ABLOY OS Payara	Audit log for the use of the software by the user. e.g. logging in, changing user access and adding credentials.	SQL database	Data is generated each time a software user makes a change in the UI. Around 770 bytes per event.	DPX clears the stored data periodically. The default setting is 365 days.
ABLOY OS PROTEC2 CLIQ integration UI	Audit log for the use of the CLIQ integration in the OS software by the user. e.g. changing access profile contents and adding or removing lock opening rights to a key.	SQL database	Data is generated each time there is a change made in one of the CLIQ component programming via Abloy OS user interface. Around 820 bytes per event.	Default setting is 365 days.

4. Data sharing and use

Type of data	Data use	Sharing of data	Identity of data recipient
Access logs and audit logs	Data is used only for problem solving situations by the request of the customer.	Data is not shared with third parties.	n/a

5. Data access and user capabilities

Direct access to data	Indirect access to data	Erasure of data
The user can access the access log and audit log via the Abloy OS UI reports section. Selected data can then be exported in xls format.	n/a	Access log and the audit log can only be erased from the Service by removing the entire database or by waiting for the set data retention time to pass. Data from the product can be erased by reinstalling the firmware.

6. How to request data sharing

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

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

9. Term and termination

Your End User License Agreement to use ABLOY OS is valid on an annual rolling basis, beginning on the date you sign up or otherwise agree to the Terms of Use of the Service.

You may end the contract by following the steps set out in the Termination clause of 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.