

Manufacturer / Distributor:

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ASSA ABLOY OS Sweden, Förmansvägen 11, 11743 Stockholm, Sweden

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Service provider:

ASSA ABLOY Opening Solutions Poland SA, Iłżecka 24, 02-001 Warsaw, Poland

1. Introduction

1.1 General

This information notice explains how data generated by, or collected through, CLIQ hardware (the "**Product**") is accessed, used, and shared (including CLIQ Web Manager, CLIQ Go App, CLIQ Connect App and CLIQ Mobile Manager App (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

CLIQ is a key based digital cylinder platform, containing hardware (HW) and software (SW) for managing CLIQ Systems. During usage of the system data is generated by the HW and SW, consisting of audit trails, events and technical logs.

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'):

- CLIQ System Owner / End user
- ASSA ABLOY in cases where a hosting service is provided

1.4 Terms of use and quality of service

All CLIQ services have End User License Agreements and Privacy Statements which can be found during installation or after installation within the service itself.

2. Data which the Product is capable of generating

Product name	Nature of data	Format	Estimated volume	Collection frequency	Data retention
Cylinder	Audit Trail (AT)	Embedded proprietary 11byte format	20kb	Each key insertion results in an AT, the HW uses a circular buffer (first in, first out, FIFO) with up to 2000 entries. The collection of that data has to be requested via the service and obtained manually	Stored until overwritten due to buffer capacity (FIFO)
Key (regular)	Audit Trail (AT)	Embedded proprietary 11byte format	20kb	Each key insertion results in an AT, the HW uses a circular buffer (first in, first out, FIFO) with up to 1000 entries. The collection of data must be requested via the service and obtained manually	Stored until overwritten due to buffer capacity (FIFO)
Key (BLE)	Audit Trail (AT)	Embedded proprietary 11byte format	20kb	Each key insertion results in an AT, the HW uses a circular buffer (first in, first out, FIFO) with up to 1000 entries. Collection of that data must be requested via the service and can be obtained manually or via BLE	Stored until overwritten due to buffer capacity (FIFO)
Remote Programming Device	Event Logs Technical logs	Clear text	20kb	Event Logs – In real time and continuously by the Service. Technical logs via USB stick from the device	Stored until overwritten due to buffer capacity (FIFO)

3. Data obtained by the Services

Service name	Nature of data	Format	Estimated volume	Data retention
CLIQ Web Manager (where AA offers hosting services)	Audit Trail, Event Logs, anonymized application logs	AT and Event logs are entries in SQL data fields Application logs are text files on the server	This is dependent on system size as smaller systems create less amount of data compared to larger systems Average size of one entry in DB is 3kb	Retention period for AT and Event logs default is 1 year but can be set by user. Application logs will automatically be deleted after 30 days
CLIQ Go App	Technical logs Anonymized application analytics	Embedded proprietary format	Technical logs: ~ 2MB in a circular buffer per device, FIFO	No retention policy as the stored data is used for support cases only. Stored until overwritten due to circular buffer capacity (FIFO)
CLIQ Connect App	Technical logs Anonymized application analytics	Embedded proprietary format	~ 2MB in a circular buffer per device, FIFO	No retention policy as the stored data is used for support cases only. Stored until overwritten due to circular buffer capacity (FIFO)
CLIQ Mobile Manager	Technical logs and anonymized application analytics (only with user consent)	Embedded proprietary format	~ 2MB in a circular buffer per device, FIFO	No retention policy as the stored data is used for support cases only. Stored until overwritten due to circular buffer capacity (FIFO)

4. Data sharing and use

Type of data	Data use	Sharing of data	Identity of data recipient
CWM technical logs contain performance and diagnostic data	ASSA ABLOY is using this data only for support cases and to ensure service quality	Not shared with a third party	N/A
Mobile Application logs and analytics	ASSA ABLOY is using this data only for support cases and to ensure service quality	Technical logs are stored on the mobile device and must be shared with ASSA ABLOY by the system owner	Service Provider

5. 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 Audit Trail and Event data through the provided service	No	The system allows a customisable retention period for the data to be set by the system owner

6. 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 10). We may under certain circumstances deny a request of 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 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

Where ASSA ABLOY provides a hosting service, your contract with the local entity is typically provided on an annual rolling basis. However, please refer to your agreement for the exact terms and conditions.

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 cliqsupport@assaabloy.com.