

Primo Access Control

11/09/2025 – Version 1

Experience a safer
and more open world

Manufacturer / Distributor:

Impro Technologies, 1 Manchester Rd, New Germany, Durban, 3610, South Africa

Service provider:

The solution can be used as an on-premise solution or a cloud hosted solution.

If the solution is deployed using Impro Technologies cloud hosting services, the service provider is:

Impro Technologies, 1 Manchester Rd, New Germany, Durban, 3610, South Africa

1. Introduction

1.1 General

This information notice explains how data generated by, or collected through, the Primo Access Control System (the "**Product**") is accessed, used, and shared (including Primo Server, Primo Web Client, Primo Discovery App and Primo Firmware Upgrade Utility (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

Primo is an access control system containing hardware (HW) and software (SW) for managing and restricting access to physical locations to only authorized individuals and assets. It uses authentication methods like facial and fingerprint biometrics, key cards and pin codes to verify the identity and associated access permissions for each person or asset. The system can run on premise or as a cloud-based system. During usage of the system, data is generated by the HW and the 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'):

- Primo System Owner / End User
- Impro Technologies in cases where a hosting service is provided
- 3rd party hosting provider when hosting is not provided by Impro Technologies

1.4 Terms of use and quality of service

Primo has an End User License Agreement which can be found during the installation process, or after installation within the service install files.

2. Data which the Product is capable of generating

Product name	Nature of data	Format	Estimated volume	Collection frequency	Data retention
Controller	Access transactions, status transactions, alarm transactions, debug communication logs	.log (txt - comms logs),	1 MB per day is typical per 100 credential holders, per system	The product generates data continuously and in real-time, while users are entering and exiting access points managed by the controller.	The product stores data on device and on a remote server. Data on the device is retained until buffer overruns. Data retention on the remote server is configurable, for access transactions and indefinitely, for non-access transactions.

3. Data obtained by the Service

Service name	Nature of data	Format	Estimated volume	Data retention
Primo, Firmware Upgrade Utility, and Discovery Service	Access transactions, status transactions, alarm transactions, credential holder details, credential details, access rights, debug communication logs, hardware details	.log (txt - comms logs),	Assuming 100 credential holders: 100 MB for initial setup 1 MB per day is typical, per system	The product stores data on device and on a remote server. Data on the device is retained until buffer overruns. Data retention on the remote server is configurable, for access transactions and indefinitely, for non-access transactions.

4. Data access and user capabilities

Direct access to data	Indirect access to data	Erasure of data
<p>The Primo web-client provides several reports that expose data collected by the system, to the system owner.</p> <p>For on-premise systems, data collected by the system that is not exposed in a report can be accessed using SQL queries on the Primo SQL database.</p>	<p>For cloud-based systems, several reports are available in the GUI.</p> <p>For cloud-based systems hosted by Impro Technologies, data that is collected by the system but not exposed in a report can be extracted from the database, upon request to the hosting service contact: support@impro.net</p>	<p>Data stored on the controller can be erased by factory resetting the controller.</p> <p>The system allows a customisable retention period for access transaction data to be set by the system owner. The system owner is also able to use SQL Server tools to erase other data within the SQL database.</p>

5. How to request data sharing

For on-premise systems, if you would like to share the data generated by your system with a third party, you can do so at your discretion.

For cloud-based systems, you may request us to share data with a specific third party by submitting a formal request to Impro Technologies technical support team at support@impro.net

We may under certain circumstances deny a request of data sharing to third parties.

You can withdraw your request for data sharing at any time by submitting a formal request to do so to Impro Technologies technical support team at support@impro.net. Once withdrawn, we will cease transferring data.

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 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.

8. Term and termination

Where Impro Technologies provides a hosting service, your contract with us is typically provided on an annual rolling basis, beginning on the date you sign up or otherwise agree to the Terms of Use of the Service, however, please refer to your agreement for the exact term.

You may end the contract by following the steps set out in the termination clause of your agreement.

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 support@impro.net.