EU Data Notice



Aperio Wireless Locks and configuration tools

09/09/2025 - Version 1

Experience a safer and more open world

Manufacturer / Service provider:

ASSA ABLOY Opening Solutions Sweden AB, Förmansvägen 11, 11743 Stockholm, Sweden

1. Introduction

1.1 General

This information notice explains how data generated by, or collected through, the Aperio wireless locks and hubs and their configuration software tools, Aperio Programming Application and Aperio Installer (the "**Product**") is accessed, used, and shared (including to provide configuration and diagnostic services (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

Aperio is a wireless access control technology designed to extend or upgrade existing electronic access control systems without the need for complex wiring. Aperio uses battery-powered electronic locking devices with integrated RFID and mobile credential readers, enabling doors, cabinets, and other openings to be connected to an access control system quickly and cost-effectively. Data is generated as the products are used, with data being stored either on the devices or in a third-party access control system.

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'):

- The system owner via the third-party access control system where Aperio products are integrated and installed
- Providers of a third-party access control system with which the Aperio products are integrated may also be data holders, depending on the nature of the access control system and how it is provided.

1.4 Terms of use and quality of service

Aperio Programming Application:

• Terms & conditions are available as part of the software installation process. After installation, the software menu "Help About" shows the generic terms and also lists all references to licences of relevant open licence software and tools used in the application.

Aperio Installer - the latest version can be found online at the address below:

• EULA URL: https://aperioinstaller.com/eula

2. Data which the Product is capable of generating

Product name	Nature of data	Format	Estimated volume	Collection frequency	Data retention
Aperio lock family	Audit trails (credential type, credential ID or IDs), event logs (including major device events e.g. battery low, firmware upgrade, operation mode changes etc), diagnostic data, battery replacement, battery status, battery voltage at battery replacement, operation mode changes, sensor or operation alarms on the lock circuits.	xml, CSV, txt, json – when generated by configuration / diagnostic software tool	Audit trail entries are generated or amended each time a card is read, with up to 200 entries stored on a first-in, first- out (FIFO) basis. Counters are stored in the lock, and the value is transferred on demand using the configuration software tool. The individual file sizes are typically 1- 30kB, dependent on the number of entries.	Continuously and in real-time	Audit trail data retention can be set by the Installer between 1 day to indefinitely. All other logs are stored indefinitely

3. Data obtained by Service

Service name	Nature of data	Format	Estimated volume	Data retention
Aperio Programming Application, aka PAP tool (Windows software + radio dongle)	Audit trail, Event log, Lock Debug log, System information (e.g. diagnostics data)	xml, CSV, txt, json – when generated by configuration / diagnostic software tool	A set of diagnostic data files can be in 1-30kB size per generation. Generation is done manually by the installer or service engineer on demand, e.g., during a maintenance visit or troubleshooting process.	Indefinitely, until they are manually deleted
Aperio Installer – the configuration software tool, which consists of the web and mobile application	Audit trail, Event log, Lock Debug log, System information (e.g. diagnostics data)	xml, CSV, txt, json – when generated by configuration / diagnostic software tool	A set of diagnostic data files can be in 1-30kB size per generation. Generation is done manually by the installer or service engineer on demand, e.g., during a maintenance visit or troubleshooting process.	Audit trail files retention period is 60 days from the collection date. All other files are stored indefinitely, until they are manually deleted

4. Data access and user capabilities

Direct access to data	Erasure of data	
Using the access control software or any of the configuration software tools the users can connect to Aperio products and retrieve data Not applicable; ASSA ABLOY is not a data holder delete the data store product product		

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 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

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 of your Terms of Use.

9. Contact information

Should you have any questions regarding the data generated by the Product or the Service, do not hesitate to contact your local customer support team. Details can be found on the ASSA ABLOY Opening Solutions website for your country: https://www.assaabloy.com/group/en