



## **GDPR GUIDELINES PROACCESS SPACE**

PROACCESS SPACE ("SPACE") is a software used to manage the SALTO's access control system installed in the end customers' premises. In order to carry out such management of the locking systems, some personal data shall be loaded to SPACE (such as data of the users of the locking system).

SPACE is a server-based software, this is, a software which is downloaded to, and resides on the customers' systems. Accordingly, any data that customers load to SPACE shall remain within the customers systems and under their exclusive control, without SALTO having access to such data.

The data that may be loaded to SPACE by customers includes, the following information: name of users, telephone number of users and photography of users. In addition, there are some general purpose fields (where the end customer may include any other information that it considers appropriate).

## 1. WHICH IS THE ROLE OF SALTO, OF SALTO'S PARTNERS AND OF THE END CUSTOMER WITH RESPECT TO THE DATA LOADED TO SPACE?

### A) WHO IS THE DATA CONTROLLER OF THE DATA LOADED IN SPACE?

SALTO's end customers normally act as the **CONTROLLER** of the personal data loaded by them to SPACE (within the meaning of **CONTROLLER** under the General Data Protection Regulation), since they decide purposes and means of such data.

Within the ordinary operation of the software SPACE, **SALTO does not have access** to data loaded by end customers to SPACE. Therefore, **SALTO does not act as a PROCESSOR** of such data, except in the scenario described in section c) below.

SALTO has no control over the content that the end customers decide to load to the software. Accordingly, it is the end customers responsibility (as controllers) to ensure, before loading any data to SPACE, that they fulfill with the obligations under the General Data Protection Regulation. Among others, the end customers, shall ensure that personal data is processed lawfully (in accordance with the conditions of article 5 of the General Data Protection Regulation), obtain any applicable consents from the data subjects and inform them on their rights.

The data that may be loaded to SPACE by customers includes, the following information: name of users, telephone number of users and photography of users. In addition, there are some general purpose fields (where the end customer may include any other information that it consider appropriate).

### B) WHEN DO SALTO'S PARTNERS ACT AS PROCESSOR OF THE DATA LOADED IN SPACE?

SALTO's partner shall generally render the technical support services of first level to end customers. SALTO's partners are supposed to render such technical support services to end customers without receiving any personal data from end customers.

However, in occasional scenarios, in view of the scale of the problem and as long as such problem cannot be solved otherwise, SALTO's partners may need to connect/access to the customers' system in which SPACE resides or may need to receive from the customers a copy of the database of SPACE (which may involve SALTO's partners having access to personal data).

In such specific situations, SALTO's partners shall be acting as a **PROCESSOR** of the data loaded in SPACE (controlled by end customers). According to article 28 of the General Data Protection Regulation, the processing of personal data by a processor on behalf of the controller shall be governed by a data processor agreement.

In any case, please note that this would be always done upon express consent and request of the end customers and only under exceptional circumstances. Moreover, please note that SALTO's distributors are independent parties from SALTO. Accordingly, it is the responsibility of the end customers on the one hand and of SALTO's distributors on the other hand, to have a data processor agreement signed before SALTO's partners having access to such data (in order to comply with the General Data Protection Regulation). In order to facilitate SALTO's partners and end customers' compliance, SALTO will make available to end customers and partners a template of a data processor agreement that can be request to SALTO.

**C) IS THERE ANY EVENT IN WHICH SALTO MIGHT ACT AS A PROCESSOR OF THE DATA LOADED IN SPACE?**

SALTO's technical support department renders technical support services to end customers in certain circumstances (i.e. when problems cannot be solved through the technical support of SALTO's partners).

In general, SALTO shall render technical support services to end customers without receiving any personal data from customers. However, in occasional scenarios, in view of the scale of the problem and as long as such problem cannot be solved otherwise, SALTO's technical support department (of SALTO or of any subsidiary of SALTO) may need to connect/access to the customers' system in which SPACE resides or may need to receive from the end customers a copy of the database of SPACE (which may involve SALTO having access to personal data).

In such specific situations, SALTO shall be acting as a **PROCESSOR** of the data loaded in SPACE (controlled by end customers). According to article 28 of the General Data Protection Regulation, the processing of personal data by a processor on behalf of the controller shall be governed by a data processor agreement.

In any case, please note that this would be always done upon express consent and request of the end customers and only under exceptional circumstances. For such purposes, SALTO has implemented internal guidelines for its technical support department, including, among others, obligation to having a data protection agreement signed before being given access to any database of third parties containing personal information, as well as data protection retention rules. Besides, end customers shall ensure that any specific requirement, control or preference with respect to the processing of the personal data on their behalf, is notified to our technical support department before signing the data protection agreement and giving access to the personal data.

## 2. IS THERE ANY SITUATION IN WHICH SALTO ACTS AS CONTROLLER OF ANY DATA COLLECTED FROM END CUSTOMERS?

When end customers purchase a license and need to download the software SPACE, end customers shall create an account in Software Area of SALTO's website, for which purposes, SALTO collects basic personal information with respect to the end customers (identification and contact data, such as, name, email, address and password).

SALTO acts as a **CONTROLLER** of such personal data and will fulfill with the provisions of the General Data Protection Regulation for its processing.

## 3. WHAT DATA IS SENT BACK TO SALTO WHEN AN END CUSTOMER USES SPACE?

### GOOGLE ANALYTICS:

SPACE might use Google Analytics, a Google analysis tool that allows SALTO to measure how end customers interact with SPACE. This tool helps SALTO to improve its software and, thus, to offer a better service to end customers. Data which may be collected by Google and transferred to SALTO within this purpose, will in no event contain personal data, but it will be only anonymous information, in an aggregated basis. In any case, when SALTO uses this tool, SALTO shall duly inform end customers and shall obtain their consent according to the applicable legislation.

### JUSTIN MOBILE:

When end customers wish its users to be able to use JUSTIN MOBILE app (so as users could use their mobile phones to have access to end customers' premises), SPACE shall need to send some information to SALTO (telephone number, encrypted access permits and encrypted mobile key) to create the mobile key for such user. Please see JUSTIN MOBILE guidelines for more detail of such data transfer.

## 4. HOW DOES SALTO HELP END CUSTOMERS OF SPACE TO FULFILL WITH THE GENERAL DATA PROTECTION REGULATION?

**Within the ordinary operation of SPACE**, neither SALTO nor SALTO's partners will have access to the personal data loaded by the end customers to SPACE.

**In order to help partners and end customers to fulfill with article 28** of the General Data Protection Regulation, SALTO provides its end customers and partners with a template of the data protection agreement that may be used by them, either to regulate any access of the data loaded to SPACE in accordance with the provisions of section b) and c) above, or to regulate any other access of personal data by other third parties (such as IT companies subcontracted by end customers to host the server in which the database of SPACE is located). Such data processor agreement can be consulted at SALTO's web page.

**SALTO has implemented in its R&D department the privacy by design and by default principles** as part of its product development procedure, which ensures that SALTO takes into account privacy concerns in the development of SALTO's products and systems.

In implementation of such principles, SALTO R&D department has recently developed and implemented a new feature of SPACE, which consists of the ability of end customers to choose the period in which the name of deleted users will disappear from the database of SPACE. Such new feature permits end customer to decide whether they want such names to be deleted immediately when users are deleted from the system or if they want such data to be automatically deleted after certain period of time after users are deleted from the system (so as end customers can consult the events of such users during a certain period of time). Such new feature is available from SPACE 5.0 software version. All our customers are encouraged to download and update the software to benefit from such new feature.

**In the event in which SALTO needs to act as a PROCESSOR** of the personal data for rendering technical support services (event described in section c) above) SALTO guarantees that it shall not transfer any of the personal data of its end customers residing in Europe to countries located outside the European Union.

**SALTO considers that SPACE has some useful features and settings that can help SALTO's customers**, as data controllers, to comply with some of the requirements of the General Data Protection Regulation:

### **Easily retrieval from SPACE of all stored personal data relating to a particular data subject:**

SPACE enables customers to easily visualize and save in a file the data which are stored in SPACE with respect to each of the end users of the locking system.

This feature can help end customers to comply with the main goal of identifying the personal data which is stored in SPACE, so as they can take such information into account when drafting the data processing inventory required under article 30 of the General Data Protection Regulation.

Moreover, this feature can help customers to fulfill with its obligations imposed by article 25 of the General Data Protection Regulation, in case that any data subject (end users) exercises its access right.

### **Ability to consult the total number of users which are stored in SPACE:**

SPACE permits end customers to check the total number of users whose data is stored in SPACE.

This option can be useful within the framework of the risks assessment to be carried out by end customers as data controllers.

**Automatically erasure of old events related to users:**

SPACE permits the end customer to define the period in which old events related to users of the locking systems shall be automatically deleted.

This feature helps customers to fulfill with the privacy by design and by default principles as well as with the storage limitation principle raised by the General Data Protection Regulation.

**Easily delete personal data relating to a particular data subject:**

SPACE enables to easily delete, through one single action, all personal data which is stored in SPACE relating to a particular data subject.

When end users are deleted from SPACE by the end customers, all personal data of such users shall be automatically deleted, with the exception of the name. The name of deleted end users shall be automatically deleted from the database within the period set forth by the end customer (immediately or within a certain period of time, depending on the configuration given by the customer). Please, note that as mentioned above, in order for end customers to benefit from this latter feature, end customers shall use SPACE 5.0 or later.

This feature can help end customers to fulfill with its obligations imposed by article 17 of the General Data Protection Regulation in case of exercise by any data subject (end users) of their right to erasure.

**Existence of access control and authentication mechanisms which only enable authorized persons to have access to SPACE and to the personal data stored therein:**

SPACE has authentication mechanisms which ensure that no authorized person could have access to SPACE and to the personal data stored therein.

In addition, SPACE permits to grant different permissions to different people, so as to ensure that each person is only granted with the amount of access that he needs to perform his job (instead of giving everybody unrestricted permission and access to all the data).

These features help customers to fulfill with the requirement of article 25.2 of the General Data Protection Regulation that states that the controller “shall implement, by default, only personal data which are necessary for each specific purpose of the processing are processed”.



### According to article 32 of the General Data

**Protection Regulation**, controllers shall implement the appropriate technical and organizational measures taking into account the state of the art and the costs of implementation and the nature, scope, context and purposes of the processing as well as the risks of varying likelihood. We set forth below some aspects that end customers could take into account when evaluating SPACE:

- The database of SPACE where the personal data are stored is also protected through authentication mechanisms.
- SPACE permits the option to protect the communications between the server and the browser and the web application.
- SPACE has been submitted to external security audits.
- SPACE permits to set recurring back-up tasks.

## DISCLAIMER

The information and documentation included in this document and any related document is only a commentary on the General Data Protection Regulation based on SALTO's interpretation of the General Data Protection Regulation as of the date of its publication. It is intended only to contribute a better understanding by SALTO's partners and end customers of the General Data Protection Regulation and to help them to identify the data which might be processed when end customers use SALTO's systems, products or services. Such information and documentation is not intended to be considered as an exhaustive summary of all the obligations and implications of the General Data Protection Regulation.

Accordingly, the information and documentation is provided "as-is", for informative purposes only, with the aim to facilitate our customer's compliance with the General Data Protection Regulation, but under no circumstances can be considered as legal advice or can serve to determine how to apply the General Data Protection Regulation to our customers' organization. Any data processing operation needs to be put in context in order to assess controllers' or processor's compliance with data protection rules. Therefore, application of the General Data Protection Regulation shall be studied case by case, since it depends on a wide range of variables and factors (among others, the customers' evaluation of their own risks and circumstances).

For all such reasons, our customers are strongly encouraged to obtain appropriate legal advice on the General Data Protection Regulation and on how the same shall apply to its organization (including, among others, any specific requirements, obligations and measures).

Moreover, the information and documentation included in this document and any related document are drafted for Business-to-Business (B2B) relationships, i.e. when SALTO's end customers are legal entities. Accordingly, the same may not address all data protection issues arising in the context of Business-to-Consumer (B2C) relationships.

The information and documentation included in this document is not definite and shall be considered as a "living tool" open for improvement and amendment. Accordingly, it could be either amended or complemented at any time without any previous notice.



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