

# Data privacy policy

for the Software Clex Key - Smartphone App  
(for Android & iOS)



## Implementation of the requirements of Article 25 DS-GVO (Basic Data Privacy Regulation)

The measures to ensure data privacy compliance in accordance with Article 25 DS-GVO are described below.

### Developers

The Clex Key smartphone applications for iOS and Android operating systems are developed by Uhlmann & Zacher GmbH, Gutenbergstr. 2 -4, 97297 Waldbuettelbrunn. The software is used for opening and closing the locking units in systems manufactured by Uhlmann & Zacher GmbH and your OEM partners.

### Data privacy officer

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### Access rights of the app

The application requires access to your location to communicate with the locking units. This access right is required to display the locking units within the range of the Bluetooth® module of the mobile terminal and to communicate with the locking units. The app does not require any other access rights.

### General data processing information about Uhlmann & Zacher GmbH processing personal data

Personal data is only collected and stored on your own mobile device by the Clex Key software. Data is only collected if it is entered by the user or generated through conscious interaction with the hardware. No personal data or usage data is collected or sent to Uhlmann & Zacher GmbH.

### Processing of personal data by the operator of the locking system from whom you have received a usage invitation

To receive an invitation to use Clex Key, share personal data such as e-mail address and telephone number with the operator of the locking system outside Clex Key. These are stored by the operator on his system and processed. All interactions with the locking units are recorded both on your own mobile device, as well as in the locking units. They can be viewed later by those who have access to your mobile device and by those who manage the locking system. This can also be used to draw inference about your location at certain times and movement profiles could be created by the operator of the locking system. You can not use the application if you generally do not want such data to be collected.

Waldbuettelbrunn, 03.03.2020 - Konrad Griebel, Data privacy officer