

EU Data Information Notice	Information Notice Category	Date updated	Version
9Solutions Smooth	Connected product and related service(s) to a connected product].	28/04/2026	01

Manufacturer/Distributor	Service Provider
9Solutions Oy	9Solutions Oy
Geographical/physical address	Geographical/physical address
Elektroniikkatie 2, 90590 Oulu Finland	Elektroniikkatie 2, 90590 Oulu Finland

Data Information Notice

Introduction

General

This information notice explains how data generated by, or collected through, the 9Solutions' products is accessed, used, and shared to 9Solutions Smooth (the "Service") and how the data is otherwise processed, in line with the requirements under Article 3 of the EU Data Act.

Product and service description

The 9Solutions Smooth system is a wireless IoT-based platform designed for care and safety monitoring. The system comprises a set of tags, a network of wireless Nodes, and an IoT gateway (CCU), through which data is transmitted wirelessly and forwarded to the cloud for processing. All actions are executed in accordance with customer-defined configurations.

In a standard configuration, the system generates alerts delivered to a designated mobile device installed with 9Solutions application, including a customer-specified user and tag identifier along with location data. In addition to event-based data, the system continuously collects diagnostic information such as battery status and device health metrics for all connected devices.

The system also incorporates door locks, cabinet locks, and camera streams. All access-related events are logged, including the identity of the user who operated a lock or accessed a camera stream, the associated device identifier, and the timestamp of the event. This data is retained in the system database.

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 following parties receive data from the Service and may use the data for their own purposes ('data holders'):

9Solutions Oy, Elekroniikkatie 2, 90590 Oulu, Finland

Terms of use and quality of service

9Solutions Smooth is governed by Terms of Use, including SLA, and Privacy Statements provided to the customer upon purchase of the product and service.

Data which the Product is capable of generating from products

Product category	Data type	Format	Estimated volume	Generation	Data retention
Tags supporting locationing:	Beacon data Sensor data Usage data	Triggered events are stored into System Event Log, XLS export support	400 KB/ day (8hours of usage, 8 button presses / day)	Continuous, when used	Permanent retention (Smooth Event Log events) All other data deleted when the device is removed from the system
Devices with no location support:	Diagnostics data Sensor data Usage data	Triggered events are stored into System Event Log, XLS export support	110KB/ day - 300KB/ day depending on the device and usage	Diagnostics: Continuous Sensor data/ Usage data: when used	Permanent retention (Smooth Event Log events) All other data deleted when the device is removed from the system
Nodes	Locationing data Diagnostics data	Triggered diagnostics events are stored into System Event Log, XLS export support	CCU/ Node cell up to 80kbps	Continuous	Permanent retention (Smooth Event Log events) All other data deleted when the device is removed from the system
CCU / HACCU IoT gateway	Diagnostics data	Triggered diagnostics events are stored into System	Diagnostics data <1MB/ day (Node data excluded)	Continuous	Permanent retention (Smooth Event Log events)

Product category	Data type	Format	Estimated volume	Generation	Data retention
		Event Log, XLS export support			All other data deleted when the device is removed from the system
Mobile application	Diagnostics data	Smooth UI	<1MB/ day (only diagnostics, other usage based data excluded)	Continuous	Device details, Diagnostics, Logged in user: until device removal from the system
	Device details	Smooth UI	Registration		Other data: Permanent retention (Smooth Event Log Events)
	Logged in user	Smooth UI	Usage based, when changed		
	Presence data (when enabled by users)	(not visible, used in event handling)	Usage based		
	Location data (when enabled by the user)	GPS coordinates	Dynamic based on mobile devices motion, power management (estimated <2MB /day during 8hrs work shift)	Continuous when used	GPS location data 24hrs or data is removed when person is removed from the system
LED-panels	Diagnostics data	Status visible in Smooth UI	<1MB / day	Continuous	Until removed from the system
Locks	Usage data, Sensor data	Triggered events are stored into System Event Log, XLS export support	<300KB / day	Sensor data/ Usage data: when used	Permanent retention (Smooth Event Log events) All other data deleted when the device is removed from the system

Product category	Data type	Format	Estimated volume	Generation	Data retention
Cameras	Video stream	Smooth UI event can be used to view the stream	Up to 1-2MB/ sec (depending on configuration)	Video on demand	Video streams are not stored
	Diagnostics data Sensor data	Status visible in UI		Diagnostics continuous Sensor data when triggered	All other data deleted when the device is removed from the system
Homecare Call Units	Call Center Audio recordings	WAV, not directly accessible for the users	Usage dependent, average 1.4MB / call	When called	Permanent retention
	Diagnostics data Usage Data	Triggered events are stored into System Event Log (XLS export support)	<2MB / day depending on usage	Diagnostics continuous Usage data based on usage (eg button presses)	All other data deleted when the device is removed from the system Permanent retention (Smooth Event Log events)

Data obtained by 9Solutions

Nature of data	Format	Estimated volume	Data retention
Usage data Diagnostics data Sensor data Location data Presence data Battery data Audio recordings	Smooth Event Log, data is exportable. Battery data is visible for the device in UI WAV	Usage data / location: ~500bytes for a generated event that contains when, who, what, where Diagnostics/ battery data: ~40 bytes / device Usage dependent, average: 1.4MB / call	Permanent retention: Event Log events (Usage data, location data, presence data, sensor data), audio recordings Device specific data (battery data) is kept until device removal

Data sharing and use

Type of data	Data use	Sharing of data	Identity of data recipient
Battery data	Battery data is used to define battery alert algorithms	Battery data is not shared to third parties	-
Location data	Location data is used on improving the locationing algorithm	Location data is not shared to third parties	-

Data access and user capabilities

Direct access to data	Indirect access to data	Erasure of data
Direct access to data at the device level is not supported. Data generated by system components — including Tags, Nodes, CCUs, and Call Units — is transmitted to and accessible only through the cloud platform of the Service. No local data extraction or direct device interrogation is possible.	Data not directly accessible from the Service can be requested from 9Solutions via the support channels. The data not accessible from the UI include audio recordings in Home Care-installations.	Data may be erased upon the customer's written request submitted through the appropriate support channels.

How to request data sharing

You may request us to share data with a specific third party by submitting a formal request using 9Solutions's support -email (support@9solutions.com). 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 replying to the initiated request ticket. Once withdrawn, we will cease transferring data.

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.

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 preserve 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.

Term and termination

The duration of the agreement for the provision of the Service is as set forth in the applicable signed agreement between you and 9Solutions, or between you and an authorised 9Solutions partner, commencing on the date you execute or otherwise accept the applicable terms of use.

Either party may terminate the applicable agreement in accordance with the termination provisions specified therein. Where the agreement has been entered into through an authorised 9Solutions partner, termination rights and procedures shall be as set out in the applicable partner agreement. For further information on how to initiate termination, please refer to your signed agreement or contact 9Solutions or your authorised partner directly. Please note that notice periods and other special conditions may apply.

Contact information

Should you have any questions regarding the data generated by the Product or the Service, do not hesitate to contact us at dataact.seniorcare@assaabloy.com.