

2. Data We Collect and Why We Process It

Below, we describe the **purposes** for which we process personal data, the **types of personal data** involved, and the **legal basis** on which we rely on.

2.1 IstroSec Services

Purpose	Description	Processed Data	Legal Basis
Customer Contract Management and Communication	Contract conclusion and ongoing management (e.g., record-keeping, invoicing), as well as customer support services	<p>Identification data: Name, surname</p> <p>Contact details: Email, phone number, mailing address</p> <p>Company details: Company name, job title, departmental information</p> <p>Financial and billing details: Invoicing information, payment details, VAT or tax ID, transaction logs</p> <p>Other data: Contract-related documents, correspondence, and support ticket information</p>	Performance of a contract (Article 6(1)(b) GDPR)
Employee Management and HR Administration	Recruitment and ongoing employee administration (e.g., attendance records, payroll, benefits)	<p>Identification data: Full name, date of birth, personal ID/passport number</p> <p>Contact details: Email, phone, address, emergency contact</p> <p>Employment details: Employment contracts, job position, attendance records, performance assessments, payroll information</p>	<p>Performance of a contract (Article 6(1)(b) GDPR)</p> <p>Legal obligation (Article 6(1)(c) GDPR)</p>

		<p>Financial details: Bank account, salary data, tax or social security identifiers</p> <p>Other: HR-related documents</p>	
Provision of Customer Service and Support	When you use our services or contact our support team for help, we process personal data necessary to provide assistance	<p>Identification details: Name, username or ID</p> <p>Contact data: Email, phone number</p> <p>Credentials: Username, password (hashed or protected), authorization logs</p> <p>Technical data: IP address, device information, system logs</p> <p>Support details: Information you disclose in a support query, transcripts of conversations, screen recordings if shared for troubleshooting</p>	Performance of a contract (Article 6(1)(b) GDPR)
Marketing and Promotion Services	Sending newsletters, organizing events, contacting potential and existing customers for promotional activities	<p>Contact details: Email, phone number, mailing address</p> <p>Customer preferences: Marketing preferences, subscription details, interests in certain products or services</p> <p>Service usage data: How you engage with our materials or events</p> <p>Other marketing-related data: Event attendance info, feedback or survey responses</p>	<p>Consent (Article 6(1)(a) GDPR)</p> <p>Legitimate interest (Article 6(1)(f) GDPR)</p>

Corporate IT System Protection and Monitoring	Preventing data breaches, securing IT infrastructure, maintaining logs and system integrity	System access logs: Timestamps, login attempts Network details: IP addresses, MAC addresses, device or browser identifiers Activity logs: Records of actions on our systems, error logs Security events: Suspicious activity or intrusion alerts	Legitimate interest (Article 6(1)(f) GDPR)
Supplier Relationship Management	Managing contractual relationships with suppliers (e.g., contract conclusion, billing)	Identification data: Name, surname Contact details: Email, phone number, mailing address Business partner information: Supplier company name, VAT or tax ID, financial account details Communication details: Emails, contracts, negotiations	Performance of a contract (Article 6(1)(b) GDPR)
Research and Development in Cybersecurity and related services provided by IstroSec	Analysing threats, developing detection systems, and implementing other security measures	Anonymized incident data: Malware signatures, event timestamps Cyberattack / Cyber security incident information: Logs, threat indicators, relevant IP addresses, domains Technical data: System environment details, anonymized or pseudonymized user info where possible	Legitimate interest (Article 6(1)(f) GDPR)
Training and Awareness Activities	Organizing cybersecurity training and exercises for	Identification details: Name, surname Professional details: Job title, department	Consent (Article 6(1)(a) GDPR)

	employees, customers, or partners	<p>Contact data: Email, phone number</p> <p>Training feedback: Results of quizzes or assessments, completion certificates</p>	Performance of a contract (Article 6(1)(b) GDPR)
Product Testing	Collecting user feedback to test, develop, and improve IstroSec products and services	<p>Identification details: Name, surname, company you represent</p> <p>Contact details: Email, phone number</p> <p>Technical information: Logs, device info, OS/browser data, error reports</p> <p>Feedback: Opinions, suggestions, or survey responses</p>	Legitimate interest (Article 6(1)(f) GDPR)
Defending Our Rights and Claims	Processing your data when a legal claim is made against us or we need to protect our rights through legal proceedings or similar measures	<p>Identification details: Name, surname</p> <p>Contact details: Address, phone number, email</p> <p>Contractual or legal details: Relevant agreements, communication records</p> <p>Any other necessary data: Documentation or evidence needed to establish, exercise, or defend legal rights</p>	<p>Legitimate interest (Article 6(1)(f) GDPR)</p> <p>Legal obligation (Article 6(1)(c) GDPR)</p>
Fulfilment of Legal Obligations	When specific legal regulations require us to process personal data (e.g., tax, accounting, whistleblowing, anti-discrimination laws) or to provide data to public	Data required by law: This may include identification details, accounting or tax documents, records of transactions, or any data reasonably required under applicable legislation	Legal obligation (Article 6(1)(c) GDPR)

	authorities where lawfully mandated		
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2.2 IstroSec Website & Marketing

Purpose	Description	Processed Data	Legal Basis
Direct Marketing and Promotion	IstroSec may use your data for its own marketing purposes. If you sign up for our newsletter or similar marketing content, we tailor communications to your preferences. We may use third-party sources or publicly accessible information to enhance your data	<p>Identification details: Name, surname</p> <p>Contact details: Email, phone number, mailing address</p> <p>Newsletter preferences: Marketing interests, subscription details</p> <p>Professional details: Employer, job position</p>	<p>Consent (Article 6(1)(a) GDPR)</p> <p>Legitimate interest (Article 6(1)(f) GDPR)</p>
Event and Webinar Attendance	If you sign up for events or webinars, we process your data to manage attendance, provide event materials, and follow up with you afterward	<p>Identification details: Name, surname</p> <p>Contact details: Email, phone number, address</p> <p>Event details: Events/webinars you signed up for, attendance logs</p> <p>Professional details: Employer, job position</p> <p>Other: Additional info you share with us</p>	Performance of a contract (Article 6(1)(b) GDPR)
Third-Party Marketing	We may occasionally provide you with advertising or marketing materials on behalf of third parties through email or other means, only if you have agreed to receive such communications	<p>Identification details: Name, surname</p> <p>Contact details: Email, phone number, address</p> <p>Marketing preferences: Newsletter or topic interests</p>	Consent (Article 6(1)(a) GDPR)

		Professional details: Employer, job position	
Website Browsing	When you browse our websites, we use cookies and similar technologies to deliver relevant content, remember your preferences, and improve overall website functionality	Technical and usage information: IP address, device/browser info, operating system, session logs Cookie data: Preferences, user IDs, browsing history on our site	Legitimate interest (Article 6(1)(f) GDPR) Consent (Article 6(1)(a) GDPR) for non-essential cookies

2.3 IstroSec Careers

For recruitment-related activities, IstroSec (and, where applicable, a respective affiliate) is the data controller.

Purpose	Description	Processed Data	Legal Basis
Recruitment Process	If you apply for an open position at IstroSec, we process your data to assess your suitability for the role and manage the recruitment process	Identification details: Name, surname, date of birth Contact details: Address, phone number, email Professional or academic info: Information in your CV/cover letter (past positions, qualifications, certifications, skills) Any additional info: Data you provide during interviews or communications	Legitimate interest (Article 6(1)(f) GDPR) Performance of a contract (Article 6(1)(b) GDPR)
Interview Recording	In certain cases, interviews may be recorded (audio or video) with your prior consent, allowing the interviewer to focus on the conversation rather than note-taking. You may decline to be recorded	Identification details: Name, surname Professional background: Past positions, qualifications Employer info: Your current employer and position	Consent (Article 6(1)(a) GDPR)

		<p>Video/voice recordings: Personal expressions during the interview</p> <p>Other: Any information you share in the interview</p>	
Pre-Employment Screening	We may verify the accuracy of information in your CV (e.g., ID checks, right-to-work checks, global sanctions checks, criminal record, financial checks, adverse media checks). We also collect or receive personal data from publicly available websites (e.g., LinkedIn), recruitment agencies, or from references provided by previous employers	<p>Identification details: Name, surname, date of birth</p> <p>Contact details: Address, phone, email</p> <p>CV/cover letter data: Past employers, references, qualifications</p> <p>Legal checks: Criminal records (where allowed), right-to-work documents</p> <p>Financial info: If required for specific roles</p> <p>Other: As needed for due diligence</p>	<p>Legitimate interest (Article 6(1)(f) GDPR)</p> <p>Performance of a contract (Article 6(1)(b) GDPR)</p> <p>Legal obligation (Article 6(1)(c) GDPR)</p>
Database of Job Applicants	We may retain your CV in our internal database for future job openings or talent pooling, but only if you consent to such retention	<p>Identification details: Name, surname</p> <p>Contact details: Address, phone, email</p> <p>Professional or academic info: CV data, cover letter, references, qualifications</p>	Consent (Article 6(1)(a) GDPR)

2.4 Note on Affiliates

If, for any reason, one of our **affiliates** becomes involved in the data processing for the purposes set out in this Policy, that affiliate will also be bound by the provisions of this Policy, or a substantially similar policy, and will act as a **joint controller** or a **separate controller** (as appropriate). Any reference to "IstroSec" in this document thus applies to **IstroSec s.r.o.** and the **respective affiliate** when the affiliate is involved.