



Privacy Notice

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Introduction

Black Cell Hungary Limited Liability Company (registered office: 1064 Budapest, Vörösmarty street 67, IV. floor 2, company registration number: 01-09-943820, representative: Gergő Gyebnár, hereinafter referred to as Black Cell, controller, or the Company) is committed to an adequate level of protection of the personal data of natural persons. For this reason, natural persons who wish to use the services of the Fusion Center application operated by Black Cell and available at <https://fc.blackcell.io/> website, may find out about their rights and obligations that may arise in connection with the use of the site in the context of this privacy policy.

Purpose of the Privacy Notice

The purpose of this privacy notice is to provide adequate information to the data subjects on their rights under Articles 12 and 13 of Regulation (EC) No 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46/EC (General Data Protection Regulation) (hereinafter referred to as the GDPR or General Data Protection Regulation).

Information on data processing

Representative of the Data Controller

Representative:	Gergő Gyebnár CEO
Black Cell's correspondence address:	Hungary-1064 Budapest, Vörösmarty street 67. IV. floor 2.
Electronic mail contact:	info@blackcell.io

Data Protection Officer of the Data Controller

Data Protection Officer (DPO)	Zsolt Baranya
Correspondence address:	Hungary-1064 Budapest, Vörösmarty street 67. IV. floor 2.
Electronic mail contact:	dpo@blackcell.io



Data processing activities

Passive vulnerability scanning

Purpose of data processing:	Passive vulnerability scanning of systems and components of an organization using Black Cell Fusion Center
Legal basis for processing:	Article 6(1)(b) of GDPR
The scope of the personal data processed:	<ul style="list-style-type: none"> – IP addresses – Host name
The recipients of the personal data and the categories of recipients:	The personal data provided may only be accessed by employees of the controller.
Retention period of personal data:	Meanwhile using the Fusion Center application or until the data is deleted by the user.
Data processor:	Rendszerinformatika Ltd. (Registered office: Hungary-1134 Budapest, Váci road 19, IV. floor, tax number: 23095942-2-41)
Transfer of data to a third country:	Data is not transferred to third countries.

User and access rights management

Purpose of data processing:	Identify who is authorized to use the Fusion Center application and provide the appropriate access rights and functions (authentication and authorization)
Legal basis for processing:	Article 6(1)(b) of GDPR
The scope of the personal data processed:	Username (e-mail address), job title, employer (organization), access rights.
The recipients of the personal data and the categories of recipients:	The personal data provided can only be accessed by the controller's employees.



Retention period of personal data:	Meanwhile using the Fusion Center application or until the data is deleted by the user.
Data processor:	Microsoft Ireland Ltd. (Ireland-Dublin D18 P521, South County Business Park, One Microsoft Place, Carmanhall and Leopardstown)
Transfer of data to a third country:	Personal data of data subjects are transferred to the United States of America for the purposes of data processing and management.

Data processing in relation to the threat mapping

Purpose of data processing:	Visually display events and threats to organizations.
Legal basis for processing:	Article 6(1)(b) of GDPR
The scope of the personal data processed:	IP addresses
The recipients of the personal data and the categories of recipients:	The personal data provided can only be accessed by the employees of the controller.
Retention period of personal data:	30 days
Data processor:	Rendszerinformatika Ltd. (Registered office: Hungary-1134 Budapest, Váci road 19, IV. floor, tax number: 23095942-2-41)
Transfer of data to a third country:	Data is not transferred to third countries.

Security of data processing

Black Cell makes its utmost efforts to protect the personal data provided by data subjects against any unauthorized access, alteration, or deletion by appropriate technical and organisational measures, taking into account the state of science and technology and the costs of implementation, the nature, scope, context and purposes



of the processing, as well as the risk to the rights and freedoms of natural persons, which vary in likelihood and severity. In this context, the controller has implemented the following data security measures:

- DDOS protection
- web application firewall (WAF)
- DMZ
- Endpoint protection
- Azure Active Directory SSO, MFA
- Splunk Enterprise log collection and analysis, Black Cell Fusion Center real-time monitoring and incident management

Further information

Consent

In relation to the Fusion Center site and its sub-sites operated by Black Cell as the data controller, the companies and their natural persons, representatives and employees using the functions may provide personal data, which is provided voluntarily. By entering the data, the data subjects give their consent to the processing of the data.

Requests

The data subject can request:

- to obtain from the controller access to personal data concerning them, and,
- rectification, erasure, or restriction of processing of personal data; and
- object to the processing of their personal data,
- the data subject may also exercise their right to data portability.

Complaints received by the controller shall be examined, dealt with, and answered by the Data Protection Officer of the controller within 30 days of receipt at the latest.

Complaint

The data subject may submit a complaint about the data processing to the supervisory authority.

Name of authority: Hungarian National Authority for Data Protection and Freedom of Information (Hungarian abbreviation: NAIH)

Correspondence address: Hungary-1530 Budapest, Postbox.: 5



Electronic contact details: <https://www.naih.hu/online-ugyinditas>

Electronic mail address: ugyfelszolgalat@naih.hu

Judicial Process

The data subject may bring an action against the controller in court if there is a presumed infringement of their rights. The Metropolitan Court of Budapest has jurisdiction to rule on the case. The lawsuit may also be brought before the court of the place of residence or domicile of the data subject, at the data subject's choice. The Black Cell stipulates the application of Hungarian law as the governing law.

Information on the use of cookies

The Data Controller uses "cookies" on its websites in accordance with this privacy policy. Cookies are files that store identifying information on the terminal equipment of natural persons who opened the websites. In accordance with the provisions of Directive 2002/58/EC of the European Parliament and of the Council concerning the processing of personal data and the protection of privacy in the electronic communications sector (hereinafter "Directive on privacy and electronic communications"), users must be informed in advance of the purpose of the use of cookies. Where the use of cookies is subject to the consent of the user, it should be possible for the user to refuse the installation of cookies on terminal equipment.

The purpose of the use of cookies is to identify and distinguish visitors, i.e., users, to identify sessions, to store data entered in sessions, to prevent the loss of stored data and to track visitors in order to enable the controller to provide a personalized and secure service to visitors and users.

We distinguish between proprietary and third-party cookies according to the user of the cookie. As well as persistent cookies, which remain on the user's device for a limited period or until deleted by the user. Or session cookies, which are temporarily placed on the user's device and are deleted from the device at the end of the session or when the browser is closed.

The controller uses the following types of cookies on its websites:

The use of cookies to ensure the proper functioning of the websites is necessary for their proper functioning, for the navigation and the use of the functionalities of the websites. By using the site, the visitor accepts their use.



Functional cookies are used to make the website more convenient to use, including the possibility for the site to remember the user's preferences (e.g., language settings) and the information previously provided by the user on the website.

Further information on the management and deletion of cookies used on the websites of the data controller, depending on the type of browser used by the visitor, is available on the websites of the browsers.

If the natural person concerned does not consent to the controller installing cookies on their device, they have the right to disable the use of cookies in the settings of the device, in whole or in part.

Privacy Notice on Cookie related data processing

Data processing

Purpose of data processing:	Ensure the safe browsing experience of the natural persons (data subjects) representing their company when using the Black Cell Fusion Center website
Legal basis for processing:	Article 6(1)(a) of GDPR
The scope of the personal data processed:	IP address of persons concerned
The recipients of the personal data and the categories of recipients:	The personal data provided may only be accessed by the staff of the controller.
Retention period of personal data:	3 hours
Data processor:	Rendszerinformatika Ltd. (Registered office: Hungary-1134 Budapest, Váci road 19, IV. floor, tax number: 23095942-2-41)
Transfer of data to a third country:	Data is not transferred to third countries.

Cookies used by Black Cell

The Controller uses the following cookies on the Fusion Center site:

Cookie name	Cookie type	Cookie expiration	Purpose
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csrftoken	Necessary for operation	Expires with <i>sessionid</i> cookie	Provides protection against cross-site request forgery
sessionid	Necessary for operation	3 hours	Identifies the session created after the user has authenticated. After expiration, the user must authenticate again.

Final provisions

In the context of the exclusion of liability, the data subject's attention is drawn to the fact that if he or she does not provide his or her own personal data through the controller's interface or any other communication channel, the controller shall not be liable for the processing of such data. The data subject is obliged to obtain the consent of the data subject for the processing of the personal data provided.

In matters not covered by this Privacy Notice, the provisions of the applicable legislation, in particular the General Data Protection Regulation, the ePrivacy Directive, the Hungarian Act CXII of 2011 on the right to information self-determination and freedom of information (Hungarian abbreviation: Infotv.), Act CVIII of 2001 on certain aspects of electronic commerce services and information society services and Act V of 2013 on the Civil Code shall apply.

The data controller shall amend this notice from time to time, in particular in the event of changes in legislation or developments in data protection jurisprudence. If the modification affects the use of the personal data processed, the user will be informed of the changes by e-mail.

Date and place: Budapest, according to electronic signature.

Black Cell Magyarország Ltd.

