



Information notice concerning the protection of personal data

Welcome to **CyberShield**'s privacy policy!

When you want to benefit from the products and services offered by our company (hereinafter referred to as "**CyberShield** ") or wish to enter into a partnership with **CyberShield**, you entrust us with information about yourself, also known as personal data, by virtue of your trust in us. We thank you for that trust, so we want to explain to you in a clear and transparent way what our practices are regarding the privacy of your data. Our general approach is to take care of the personal data you provide to us.

This notice (*also known as our Privacy Policy*) will show you how we look after your data when you visit our site (wherever you use it) and tell you about your rights in relation to your personal data and how the law protects you.

The briefing note is structured in such a way that you can click on the chapters below and read them directly (you can also download the .pdf version here cybershield.org/politica-confidentialitate.pdf). Please also refer to the definitions in this document to understand the meaning of some of the terms used in this information note.

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1. Introduction

1.1. The purpose of this information note

This Information Notice (the "**Notice**") is intended to inform you about how **CyberShield** (which we may also refer to as "we", "us", "the Organization" or "the NGO") collects and processes your personal data that you provide to us, including any data that you give us when, for example, you complete the contact form on our website, purchase or download a product.

This Notice applies everywhere you find us online. In particular, we are present through the <https://www.cybershield.org> website and its subdomains or affiliated sites (which we will hereinafter collectively refer to as the "**Site**"), as well as all media profiles/pages associated with this brand, including but not limited to LinkedIn, YouTube, Podcast platforms such as Apple Podcast, Spotify, Google Podcast, Anchor FM, etc. and all of which we will refer to as the "**Platform**").

For ease of reference, we have put below all the profiles we manage:

Profile	Username
Website	cybershield.org , cybershield.ngo , cybershield.org
LinkedIn	https://www.linkedin.com/company/cybershield-org
Facebook	https://www.facebook.com/CyberShield.org
WhatsApp	+40723444825

The platform is not intended for children under 13, we do not knowingly collect and do not intend to collect data on minors. To this end, we take all reasonable steps to verify that the person providing the data to us is not a child, as defined below - the responsibility for any information provided to us in circumvention of these provisions rests entirely with the person providing the data to us or the guardian in the case of minors.

It is important that you read this policy together with all the data processing & privacy notices we will provide on various occasions when we collect or process your personal data so that you are always fully informed of what and how we use this data. This policy is in addition to our other notices and is not intended to remove them.

1.2. Who are we?

Below you will find our identification details:



- Name: Asociatia Educatie in Securitate Cibernetica
- Head office: 50 Linia de Centură, N32 D2 002, Ștefăneștii de Jos, Ilfov county, Romania
- Unique identification code: 48106635
- E-mail: info@cybershield.org

We are not obliged to appoint a personal data protection officer, so any questions about the use of your personal data should be directed to the contact details above.

To the extent that you have any concerns, comments, or complaints about us or the personal data we process for you, you can always send us an e-mail at the above address.

According to the law, in relation to you, we are a **personal data controller**. As such, we also have a number of obligations, including informing you about what data we process, how we do it, what rights you have, and how you can exercise those rights.

1.3. Who are you?

According to the law, you, the natural person receiving our services, the representative or contact person of a company, or the person in any kind of relationship with our company, is a "**data subject**", i.e., an identified or identifiable natural person. In order to be fully transparent about data processing and to allow you to easily exercise your rights at any time, we have implemented measures to facilitate communication between us, the data controller, and you as the data subject.

1.4. Third-party links

This Notice does not cover other third-party apps and sites that you may reach by accessing links on our site (*including when you go, for example, to our social media community pages such as LinkedIn, Spotify, etc.*), nor are we responsible for any links from our commercial partners or those who place advertisements within our podcasts or articles, including those on social media profiles. When you click on those links, third parties may collect or share data about you.

We do not control these third-party sites, nor are we responsible for their processing, privacy, and security policies. When you leave our site, we encourage you to review the Privacy Policy/Information Notice and the Terms of Use of any site and/or application before providing personal data to them.



You are fully responsible when you click on such links and assume any kind of damage (direct or indirect) that may occur.

1.5. Complaints

If you believe there is a problem with the processing of your personal data or you wish to exercise your rights under section 9, please first send us a request to the address mentioned in section 1.2 - we will make every effort to resolve your request amicably as soon as possible.

You can also lodge a complaint with the personal data supervisory authority. For Romania, contact details can be found below:

Name	National Supervisory Authority for Personal Data Processing
Address	B-dul G-ral. Gheorghe Magheru nr. 28-30, Sector 1, postal code 010336, Bucharest, Romania
Phone:	+40.318.059.211 or +40.318.059.212
E-mail	anspdc@dataprotection.ro

2. The data we collect from you

Personal data or personal information means any information about an individual that can help identify that person. This does not include data where the identity has been removed (*anonymized data*).

Depending on the products, services, or functionalities that you wish to benefit from and that we have developed, we may need to collect, use, store, or transfer certain personal data, which will generally be grouped by category as follows:

Category	Dates included
Identification data	first name, last name, company name, company registration number, unique identification code, username or similar identifier, job title, date of birth, gender, language in which you wish to interact with us, country, etc.
Date of contact	billing address, delivery address, e-mail address, telephone number
Financial data	payment or card/bank account information, purchase information
Trading dates	details of payments to and from you and other details of products and services you have purchased from us



Technical data	your <i>Internet Protocol</i> (IP) address, login details, browser type and version, location and time zone settings, browser plug-ins and versions, operating system, operating platform and other technologies on the devices you use to access this site
Profile dates	username, password (encrypted), orders placed by you, your interests and preferences, feedback provided, survey responses
Dates of use	Information about how you use our website, products and services. This includes your interactions with us in the Products, your image and voice when we have coaching sessions, mentoring sessions, when you attend courses or workshops (online or offline) and these will be recorded.
Marketing communication data	& Your preferences for receiving marketing materials from us and our third parties and preferred methods of communication

We also collect, use and share **Aggregate Data**, such as statistical or demographic data, for any purpose. Aggregate Data may be derived from your Personal Data, but is not considered Personal Data for purposes of the law as this information **does not** directly or indirectly reveal your identity. *For example*, we may aggregate your Usage Data to calculate the percentage of users accessing a specific functionality of the Site. However, if we combine or correlate Aggregated Data with your Personal Data in such a way that we can directly or indirectly identify you, we will treat the resulting combined data as Personal Data that will be used as described herein.

We DO NOT collect any **Special Categories of Personal Data** about you (this includes details of your racial or ethnic origin, political opinions, religious denomination or philosophical beliefs or trade union membership and the processing of genetic data, biometric data to uniquely identify you, health data or data about your sex life or sexual orientation).

3. If you do not provide us with the data ...

In short: *okey, sure, you've heard all about GDPR, which is a boogeyman and won't let you process any more data, and you don't want to give it to us. We hear you. But because we don't do aggressive marketing and we won't bombard you with messages to buy, let's tell you **why it's important** that you give us your data. We have lots of products and services on the Platform - how would we know what to offer you if you don't give us some clues about yourself? It's like shooting blanks. Then you'll unsubscribe, bombard us, and no one stands to gain.*

When we ask you to fill in your personal data in order to provide you with access to certain features or services of the site, we will mark some fields as *mandatory*, as this is the information, we need in order to provide you with donation/service or to give you access to



that feature.

Please note that if you choose not to provide us with this information, you may not be able to complete your user registration or benefit from these services or features. In such a case, we may have to limit your access to a product or service you want from us, but we will notify you at that time if this happens.

For example, if you want to download certain material on the Platform, we will ask you for your e-mail address; if you do not provide us with a valid e-mail address, we will not be able to provide you with that material.

Also, if at the time you send us a request via the contact address or form on the Platform or by any other means indicated, and we are unable to verify your identity, we reserve the right not to respond to that request.

At the same time, even to download certain materials or access certain information, we will ask you to provide us with certain information about yourself. This data will be used to improve our services and products and to provide you with the best experience (*like sending you Customer Experience material on an online store if you only have one physical location?*).

4. How do we collect your personal data?

In short: we collect your personal data in two broad and wide ways: (a) from you, when you personally provide us with that data, or from (b) other sources, when we need that information.

Your personal data generally comes from you through *direct interaction*, but there will be situations where we obtain data about you *indirectly* (such as from third parties, institutions, etc.) or *using technology*.

Thus, we use different methods to collect data about and from you, such as:



Source	Dates
Direct interaction	<p>You will be able to provide us directly with data about yourself (<i>such as Identification Data, Contact Data and Financial Data</i>) by filling in the fields on the site or by mail, email, telephone or other method we make available to you. This includes the personal data you provide to us when:</p> <ul style="list-style-type: none"> ▪ you want to download one or more of the materials we put on the Platform; ▪ you want to buy/benefit from one of our goods or services; ▪ you make an account with us on our website; ▪ subscribe to our services; ▪ request promotional & marketing materials; ▪ you wish to become a collaborator; ▪ enter a competition or promotion, fill in a questionnaire, etc.; ▪ give feedback etc.
Automated technologies or interactions	<p>As you use our site, we may automatically collect Technical Data about the equipment you use, how you browse and various patterns. We will collect this information through the use of cookies, server logs and other similar technologies.</p>
Third parties or publicly available information	<p>We may receive personal data about you from various third parties (or public sources), such as:</p> <ul style="list-style-type: none"> ▪ Technical data from the following third parties: <ul style="list-style-type: none"> - Analytics providers (such as Google Analytics which is located in the EU); - Search information providers (such as Google Search Console which is located in the EU); ▪ Contact Data, Financial Data and Transaction Data from technical, payment or delivery service providers (such as Termene.ro, Lege5 or MobilPay which are in the EU); ▪ Identification data and Contact details from public sources (such as Trade Register, ANAF, Ministry of Finance, Portal of Courts that are in the EU).



5. How do we use your personal data?

In general, we will use the information we receive about you, either directly or indirectly, for the following purposes:

- for the purpose of entering into or performing a contract between you and us;
- to answer your questions and requests;
- for marketing purposes, but only where we have your prior consent;
- to provide and improve the services and products we offer;
- to diagnose or fix technical problems;
- to defend against cyber-attacks;
- for creating and/or maintaining accounts;
- to comply with legislation;
- to establish or claim a right in court;
- to verify your identity (e.g., when you return to the site and are already logged in);
- to personalize your experience on our site;
- to personalize the advertising you see on other publishers' websites while limiting the amount of time you see ads;
- to improve the design and style of the site;
- to inform you about products, services or promotional offers that may be of interest to you if you have chosen to receive these types of communications;
- to send you automated messages about your subscription or account registration, for example if you have clicked on a password reset link. This could be via email, overlay or push notification;
- to publish and reply to a comment you have sent to us;
- to allow you to share content on the site with others using social media (Facebook, Instagram, WhatsApp, SMS or similar apps) or email;
- to administer competitions and inform you if you have entered a promotion;
- for compiling customer reviews;
- for market research;
- to send a product to the address you specify;
- to give you access to a service or product you request;
- to deal with any request/complaint/complaint or suggestion you send us;



- to develop future products;
- to send you push notifications via our Platform if necessary.

In short, we will use the data you provide to us (either directly or indirectly) to:

- enter into or perform a contract with you;
- to achieve our (or a third party's) legitimate interest when it is in your best interests and your fundamental rights and freedoms are not affected;
- comply with a legal or statutory obligation.

In general, we do not rely on consent to process your personal data, but when we do, we will expressly ask for it.

5.1. The purposes for which we collect your personal data

We have put below, in table format, a description of the ways in which we plan to use your personal data and the legal basis on which we do so. We have also identified our legitimate interests where appropriate.

Please note that we may process your personal data on several legal grounds, depending on the purpose for which we use the data. Please [contact us](#) at the email address in section 1.2 if you would like more details about the legal grounds we rely on when processing your personal data where there has been more than one legal ground highlighted in the table below.

Purpose	Personal data	Further information
Register as a User	Identification Contact Details	<p>If you decide to register as a user on our Site, we need to process your data in order to identify you as a user of the Site and to provide you with access to its various features, products and services available to you as a registered user. In some cases, the creation of an account will be automatic in order to access the services and products you have purchased from us.</p> <p>You can cancel your registered user account at any time either from your account on the website, from your Customer Account or at the email address in section 1.2.</p> <p>At the same time, depending on the development</p>



		<p>of the Platform, you will be able to log in via a social network, such as Facebook/Google, either to register as a new user or to associate the login with your current account. In this case, your login details, as well as your email address (if you accept this), will be imported from your social network account. By using this login option, the social network may send us some additional information from your public profile, such as your name, gender, approximate age or profile picture, in accordance with the social network's terms of use, which we recommend you read carefully. If you do not approve this data transfer, we will not keep this additional information. Please note that if you choose to connect with an approved social network, this may involve providing certain information about your activity on that social network. In any case, we recommend that you check your privacy settings and read the privacy policy of those social networks to know how this data is processed by the social networks.</p>
Access to materials	Identification Contact Details	<p>We will use your personal data to give you access to the materials you wish to download from the Platform, such as guides, lists or other materials that we will make available to you, free of charge.</p>
Access to Products	Date of Identification (including audio-video) where applicable	<p>In CyberShield, for example, we will process information about you, including what you upload or transmit to us.</p> <p>In Workshops, Courses, Coaching & Mentoring sessions, we will record all these sessions for further analysis within the company or to develop future Products.</p> <p>If you do not agree with this processing, please do not open the video camera and do not transmit audio messages. At the same time, we may sometimes restrict your access to these features to the extent that the interest of these Products is to interact with other people, including through audio-video channels.</p>



<p>Conclusion. and performance of the contract of sale or service contract you conclude with us</p>	<p>Identification Contact Details Financial Details Trade Dates Profile Date Marketing and Communication Data</p>	<p>For the operations described here, we will use your personal data to:</p> <ul style="list-style-type: none"> - contact you with updates or informational communications regarding contracted features, products or services, including sending you surveys regarding the quality of the products or services provided. - we manage payments for products or services purchased, regardless of the payment method used - if when you purchase one of our products or services through the site, you choose to activate the function of saving card data for future purchases, we must process the data provided to activate and develop that functionality for future purchases. Consenting to activate this functionality allows your payment details to automatically populate for future purchases so that you do not need to re-enter them with each new purchase and they will be considered valid and valid for future purchases. You can change or delete your payment cards or any other payment information at any time through the payment information section of your user account on the site. - activate the necessary mechanisms to prevent potential fraud against you and us during the purchasing process. If we deem that the transaction may be fraudulent, this processing may result in the transaction being blocked. - manage any returns after you have made a purchase of products or services, if applicable. - for invoicing - to provide you with electronic/physical invoices and receipts for transactions. - for the provision of other services to be implemented.
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Requests or enquiries made via Customer Service/Support	Identification Data Contact Data Financial Data; Trading Data Profile Data Marketing and Communication Data	We only process personal data strictly necessary to manage or resolve your request or application.
To manage the relationship we have with you, which includes: - notify you of changes to our terms & conditions and processing policies - please leave us a review or participate in a survey	Identification Data Contact Data Profile Data Marketing and Communication Data	We will process your data in order to keep it up to date and to understand how users use our products and services or how we can improve them.
Marketing	Identification Contact Details Trading Dates Profile Dates Marketing and Communication Data	We will process your personal data for this purpose mainly in the following cases: - if you subscribe to the newsletter, we will process your personal data to manage your communication preferences, including sending you personalized information about our products or services by various means (such as by email or SMS). We may also send you this information via push notifications if you have enabled them on your mobile device or in your browser. Please note that this data processing involves the analysis of your user profile for profiling purposes whereby we determine what your preferences are at a particular point in time based on your browsing history and choices made, and thus which products and services best suit you at the time



		<p>you submit the information to us. For example, based on your shopping and browsing history, we will make suggestions about products that we think you might be interested in and, when the situation allows, we may offer you a "retrieve shopping cart" feature.</p> <ul style="list-style-type: none"> - You will be able to unsubscribe from the newsletter at any time and completely free of charge through the "Newsletter" section of the Platform, as well as through the instructions provided in each communication. If you no longer wish to receive push notifications, you can deactivate this option on your mobile device or in your browser. - To carry out promotional actions (for example, to run contests or to send the list of products saved on the e-mail address you provide - the so-called "wish list" or "save for later", where applicable). By participating in any action - promotional campaign, you authorize us to process the data you provide for each action and which we may communicate through various means, such as social media or even on the website. For each promotional action you participate in, you will be able to access the terms and conditions section, where we will provide more detailed information about the processing of your data in that context.
Improving services	<p>Identification Contact Details Financial Details Trading Dates Profile Dates Date of Marketing and Communication Technical Dates</p>	<p>If you access our website, we inform you that we will process your browsing data for analytical and statistical purposes, i.e. to understand how users interact with our website and thus make improvements to it.</p> <p>We also sometimes carry out quality actions and surveys to find out how satisfied our customers and users are and where we can improve our products and services.</p>



To deliver relevant content and ads and to measure and understand the effectiveness of the ads we offer you	Identification Data Contact Data Financial Data Usage Data Profile Data Marketing and Communication Data Technical Data Dates	We need this data to understand how customers and users use our products and services, to develop new products, to grow our business and to adapt our marketing strategy.
Use analytics data to improve the Platform, products, services, customer service and experience	Technical Data Usage Data	We need this data to understand the customer categories for our products and services, to keep the platforms content up-to-date and of interest, to develop new products, to grow our business and to adapt our marketing strategy.
Suggestions and recommendations about products and services that might be of interest to you	Identification Data Contact Data Usage Data Profile Data Marketing and Communication Data Technical Data Dates	We need this data to grow our business and adapt our marketing strategy

Marketing

We strive to give you choices about how we use your personal data, especially in connection with marketing and advertising.

For example, we may place certain third-party advertisements in certain parts of the Platform (Google AdSense) that will deliver customized content to you based on your browsing history on other sites and/or other personal preferences. This helps us to support our business, and you can block these ads from your browser settings.

Promotional offers from us

We may use your Identifying, Contact, Technical, Usage and Profile Data to create an opinion about what we think you would like or need or be interested in. In this way, we



decide what products, services or offers might be relevant to you (we call this marketing).

You will receive marketing communications from us if you have requested information from us, purchased products or services from us, or if you have chosen to download any of our materials from the Platform and have not opted out of this marketing.

Third-party marketing

As a general rule, we do not pass on your personal data for marketing purposes to third parties. If we do, we will expressly ask for your consent.

Unsubscribe (*opt-out*)

You can ask us or third parties to stop sending you marketing messages at any time via the unsubscribe link you will find in that email or if you contact us.

When you unsubscribe from marketing messages, this unsubscribe will not apply to personal data you have provided to us when purchasing a product, downloading material, requesting information or services or other transactions.

Cookies

You can set your browser to refuse some or all cookies or to alert you when sites are placing or accessing cookies. If you disable or refuse cookies, please be aware that certain parts of the Platform will be inaccessible or will not function properly.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably believe that we need to use it for another reason and that reason is compatible with the original purpose. If you would like an explanation of how the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for a purpose unrelated to the original purpose, we will notify you and explain the legal basis for doing so.

Please note that we may process your personal data without informing you or needing your consent, in accordance with the above rules, where the law allows us to do so.



5.2. What is the legal basis for processing your personal data?

The legal basis for processing your personal data can be found below:

Purpose	Further information
Register as a User	The processing of your data is necessary for signing the terms governing the use of the site. In other words, in order to register you as a user of the site, we need to process your personal data, otherwise we would not be able to manage your registration (the basis being the conclusion or execution of a contract, including the previous steps for conclusion).
Conclusion and execution of the collaboration contract	If you want to support this project, through sponsorship or advertising campaigns, we will conclude a contract, and it is necessary for us to process your personal data.
Conclusion and performance of the sales or service contract you conclude with us	<p>It is necessary for us to process your personal data in order to be able to execute the contract for the sale of products or the provision of services you want from us.</p> <p>This includes those actions of yours where you want to download free material from our website, where we ask for personal data in order to deliver that material to you.</p> <p>As we wrote in the previous section, it is possible that certain data processing may only be activated when you ask us to do so (such as storing payment data for future purchases) or to keep you informed about the stock of our products or similar new products that we introduce to the site. The legal basis for these cases is your consent that you provide to us.</p> <p>We also have a legitimate interest in carrying out the necessary checks to detect and prevent possible fraud when you want to make a purchase, this processing being to the benefit of all parties when payment is made.</p>



<p>Requests or enquiries made via Customer Service/Support</p>	<p>We have a legitimate interest in responding to your requests or questions through the various means of contact. This includes private messages you send us asking questions about podcasts, campaigns or wanting to partner with us.</p> <p>We understand that processing this data is also to your benefit, as it allows us to properly assist you and find a solution to your questions. When you contact us, in particular for incident management or ask us for clarification of your order or the product/service purchased, the processing is necessary for the proper performance of the sales contract.</p> <p>When you contact us to manage order-related incidents or to make a complaint, the processing of your personal data is done for the fulfilment of our legal obligations in this regard.</p>
<p>Marketing</p>	<p>We process your data for marketing purposes based on the consent you give us, for example when you agree to receive personalized information by various means, when you authorize push notifications to be sent to your mobile device or browser, or when you accept the legal terms and conditions to participate in a promotional action.</p> <p>In order to present you with personalized information, we believe that we have a legitimate interest in profiling you with the information we have about you (such as your browsing, preferences or purchase history) and the personal data you provide to us at any given time, such as your age range or language, because we understand that processing this data is also for your benefit as it allows us to improve your user experience and thus access information according to your preferences.</p>
<p>Improving services</p>	<p>We believe that we have a legitimate interest when we analyze how our website is used and how satisfied the user is with it.</p> <p>The processing of this data is also to your benefit as the aim is to improve the user experience and provide a better quality of service.</p>



Product Improvement and Development	<p>Most of the products we have (e.g. courses, workshops, community, etc.) are based on human interaction and aggregation of information.</p> <p>Every interaction you participate in will then be stored and implemented in Products (current or future).</p> <p>We believe we have a legitimate business interest in doing this processing, which, together with an exclusive license you grant us, will help us develop our Products and improve ourselves. All with your help ●</p>
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In short, our grounds for processing your data will generally be as follows:

- **You have given your consent to the processing of personal data**

Please note that you can withdraw your consent at any time by following the *unsubscribe* instructions in each email or by sending a written request to gdpr@cybershield.org.

- **The processing is necessary for the conclusion or performance of a contract between you and us**
- **The processing is necessary for our legitimate interests or those of another party**

6. Disclosure of your personal data

We may transfer your personal data to the persons listed below for the purposes mentioned in point 5.1 above.

We may disclose your data, in compliance with applicable law, to business partners or other third parties.

For example, if we make a purchase for you, we will forward your details to our trading partners so that the invoice can be issued on your behalf.

Another *example* is sending personal data to the email provider we use to send messages to you.

Also, if you have a request for a product and we need to pass this data on to our partners. We make reasonable efforts at all times to ensure that these third parties have appropriate safeguards and security measures in place. We have contractual clauses with these third parties so that your data is protected. We will inform you of the identity of these companies before we transmit this data or within a reasonable time and ensure that any transfer is legitimate, based on your consent or other legal basis.



For example, we may provide your data to other companies, such as IT or telecommunications service providers, media agencies, advertising agencies, accounting and human resources services, integrated solution providers, legal services and other third parties with whom we have a contractual relationship. These third parties are selected with great care so that your data is only processed for the purposes we indicate.

We may also share your data with other business partners as part of a joint effort to provide a product or service.

Although unlikely, we may sell the business or part of the business in the future, which will include the transfer of your data.

We may also pass the data to other parties with your consent or on your instructions.

We may also provide your personal information to prosecutors, police, courts and other authorized state bodies, based on and within the limits of the law and following specific requests.

We will ensure, within reasonable limits, that your data does not leave the European Economic Space, but to the extent that we transfer data to non-EES countries, we will ensure in all cases that the transfers are legitimate, based on your explicit consent or other lawful bases.

Access to your personal data by others

In some cases, other third parties will also have access to personal data, such as:

- Facebook;
- Instagram;
- LinkedIn;
- Online chat platforms
- *Other companies in the group of companies, etc.*

7. International transfers

At this time, we do not transfer and do not intend to transfer your personal data or any part of it to other companies, organizations or individuals in third countries or to international organizations.

If we need to transfer your data to any of the above destinations, we will send you a new information notice beforehand.

The transfer of personal data to a third State may only take place if the State to which the transfer is intended ensures an adequate level of protection.



The transfer of data to a state whose legislation does not provide for a level of protection at least equal to that offered by the General Data Protection Regulation is only possible if there are sufficient safeguards to protect the fundamental rights of the data subjects. These safeguards will be established by us through contracts concluded with the providers/service providers to whom your personal data will be transferred.

Some of our service providers may be located outside the European Economic Area (EEA), so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data outside the EEA, we will ensure that a similar level of protection is in place through one of the following safeguards:

- we will transfer your personal data to countries where it has been demonstrated by the European Commission to provide an adequate level of security for personal data. For more details, click [here](#).
- when we use certain service providers, we will be able to use certain model contracts provided and approved by the European Commission which offer the same protection to personal data as they do in Europe. For more details, click [here](#).
- When we use US providers, we will be able to transfer the data if they offer similar terms of protection for data shared between the EU and the US. For more details, click [here](#).

Please [contact us](#) at the email address in section 1.2 if you would like more information about the specific mechanism we use when transferring your personal data outside the EES.

8. Data security

We understand how important the security of personal data is and we take the necessary measures to protect our customers and others whose data we process from unauthorized access to personal data, as well as from unauthorized modification, disclosure or destruction of the data we process in our day-to-day business.

We have implemented the following technical and organizational personal data security measures:

Dedicated policies. We adopt and constantly review our internal personal data processing practices and policies (including physical and electronic security measures) to protect our systems from unauthorized access or other possible security threats. These policies are subject to constant review to ensure that we comply with legal requirements and that systems are functioning properly.

Data minimization. We ensure that the personal data we process is limited to that which



is necessary, appropriate and relevant for the purposes stated in this Notice.

Restricting access to data. We try to restrict access to the personal data we process as much as possible to the minimum necessary: employees, collaborators and other persons who need to access this data in order to process it and carry out a service. Our partners and collaborators are subject to strict confidentiality obligations (either by contract or by law).

Specific technical measures. We use technologies to ensure the security of our customers, always striving to implement the best solutions for data protection. We also make regular backups of data in order to be able to recover it in the event of an incident and have regular audit procedures in place regarding the security of the equipment used. However, no website, no application and no internet connection are completely secure and unreachable.

Ensuring the accuracy of your data. Sometimes we may ask you to confirm the accuracy or currency of your data to ensure that it reflects the truth.

Staff training. We constantly train and test our employees and collaborators on legislation and best practices in the field of personal data processing.

Data anonymization. Where we can, we try as far as possible to anonymize / pseudonymize the personal data we process so that we can no longer identify the individuals to whom it relates.

However, while we constantly strive to ensure the security of the data you entrust to us, we may also experience less happy events and security incidents/breaches. In these cases, we will strictly follow the security incident reporting and notification procedure and take all necessary steps to restore the situation to normal as soon as possible.

9. Data storage

Please note that at this time, we will not process and store all of the data elements identified below, but we are constantly working on developing the Platform by introducing new products, benefits and services and have considered future implementations to be fully transparent with you.

Purpose	Further information
Register as a User	We will keep your data until you decide to stop being a user (delete your account).



Conclusion and execution of the sales or service contract you conclude with us	We will process your data for as long as necessary to manage the purchase of the products or services you purchase, including any returns, complaints, warranties or claims related to the purchase of that product or service.
Requests or enquiries made via Customer Service/Support	We will process the data for as long as necessary to fulfil the request or application.
Marketing	We will process the data until you unsubscribe from the newsletter/other marketing methods.
Improving services	We will process the data on a one-off basis, only for the duration of the respective action (<i>i.e.</i> survey, feedback form etc.)

In short, we will retain your personal data for as long as necessary to fulfil the purposes for which we have collected it, including for the purposes of meeting any legal, accounting or reporting requirements.

In determining the appropriate retention period for your personal data, we consider the value, nature and sensitivity of your personal data, the potential risk of harm caused by unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes by other means and applicable legal requirements.

We are required by law to retain basic information about our clients, contract partners and sponsors (including contact details, identity, financial and trading data) for 5 years after they are no longer clients for tax purposes.

In certain circumstances, we may anonymize your personal data (so that it can no longer be associated with you) for scientific, historical or statistical research purposes, in which case we may use this information indefinitely without prior notice to you. Please note that in certain expressly regulated situations, we store data for as long as required by law.

10. Your rights

In certain circumstances, you have certain rights to your personal data under the law. To exercise them, please [contact us](#) at the email address in section 1.2.

We have also set out these rights in detail below. But **in short**, under the law in force, you have the following rights:

- **Right to withdraw consent** - *when the processing has been based on your consent and there is no other basis for processing. Please note that withdrawal of consent*



does not affect the processing that has taken place up to that point.

- **The right to be informed about the processing of your data** - *which is done through this Information Notice.*
- **Right of access to data** - *you have the right to receive a copy of the data we process about you. Additional copies may be provided against payment.*
- **The right to rectify inaccurate or incomplete data** - *you have the right to ask us to amend/complete the data we process about you when you believe we should do so.*
- **Right to erasure ("right to be forgotten")** - *this right allows you to request that, in certain circumstances, when we have no other basis for processing your data, we erase your data and no longer process it in the future.*
- **The right to restrict processing** - *where we process your data to fulfil our public interest tasks or legitimate interests (or those of a third party) and there is something about your particular situation that makes you want to object to the processing. You also have the right to ask us to restrict processing when we process your data for direct marketing purposes.*
- **The right to transfer data we hold about you to another controller** - *where your data is in a format that allows us to transfer it to another controller in an automated, easily accessible and machine-readable format.*
- **The right to object to data processing** - *when we process your data to fulfil a public interest or pursue our legitimate interests or those of a third party.*
- **The right not to be subject to a decision based solely on automated processing, including profiling**
- **The right to seek justice**
- **The right to lodge a complaint with a Supervisory Authority**, contact details of which can be found below:

Name	National Supervisory Authority for Personal Data Processing
Address	B-dul G-ral. Gheorghe Magheru nr. 28-30, Sector 1, postal code 010336, Bucharest, Romania
Phone:	+40.318.059.211 or +40.318.059.212
E-mail	anspdcp@dataprotection.ro

Please **note** that:

- You can withdraw your consent to direct marketing at any time by following the unsubscribe instructions in each email/sms or other electronic messages.



- If you wish to exercise your rights, you can do so by sending a written, signed and dated request to the following e-mail address: gdpr@cybershield.org
- The rights listed above are not absolute. There are exceptions, so each request received will be examined to decide whether it is justified or not. To the extent that your request is justified, we will make it easier for you to exercise your rights. If the request is unfounded, we will reject it, but we will inform you of the reasons for the refusal and of your rights to lodge a complaint with the Supervisory Authority and to take legal action.
- Deadline. We will try to respond to the request within 30 days. However, the deadline may be extended depending on various aspects, such as the complexity of the request, the large number of requests received or the impossibility of identifying you within a reasonable time.
- What we might need from you. In order for us to respond to your requests exercising your rights, we may need additional information from you to confirm your identity. If, despite our best efforts, we are unable to identify you, and you do not provide us with additional information to identify you, we are not obliged to comply with your request.
- Fee. You will not have to pay any fee for exercising your right of access to data (or any other right). However, you may have to pay a reasonable fee if your request is unfounded, excessive or repetitive. Alternatively, we may refuse to comply with your request in these circumstances.

11. Changes to this Notice

We may occasionally update this Notice and will notify you via the Platform or by email of the latest version. All updates and changes to this Notice are effective immediately upon notification, which we will make by posting on the Site and/or email notification. Even if you do not receive a notification, we encourage you to periodically access and read this Notice to stay up to date with the latest versions.

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