

SERVICE-related description

Managed Firewall Service

Version 1.0 (15.11.2024)

1. Designation and object of SERVICE

1.1 Object of Service:

The SERVICE relates to services in the area of „Managed Firewall Service“.

1.2 Purpose, Scope and Type of the Service:

The parties agree on the type and scope as well as the exclusive purposes of the commissioned data processing of the data by the contractor as follows:

The Contractor shall provide data processing services on behalf of the Client as part of the technical and administrative services of providing a virtual managed firewall in the Contractor's data centre. The provision takes place in a shared or dedicated environment at the client's choice.

Specifically, the contractor provides data processing services on behalf of the client for the following purposes:

- Provision of a highly available firewall
- Monitoring (monitoring of network traffic)
- Troubleshooting
- Depending on the client's order: deep packet inspection (DPI) and TLS inspection

1.3 Type of Data:

Commissioned Data Processing relates to the following types of data:

The types of personal data processed as part of the provision of the service cannot be precisely determined in advance. The types of data depend on the nature of the client's requests, the types of connections that run through the firewall and the personal data provided by the client itself in individual cases.

In any case, the following categories of personal data are processed:

- IP addresses (source and destination IP addresses of network traffic)
- login information (e.g. user names)
- Connection protocols
- Device information (e.g. MAC addresses, operating systems and browsers used)
- Access logs and usage behaviour (records of which websites and services were accessed, which applications were used and possibly also which files were downloaded or uploaded)
- Security events and incidents (information about security-related incidents such as suspicious activities, malware detections, attack patterns and blockages)

- If TLS inspection is commissioned: communication content (e.g. email subject lines or URLs)

Special categories of data¹:

- The Commissioned Data Processing does not concern any special categories of data within the meaning of Art. 9 GDPR.
- The Commissioned Data Processing concerns the following special categories of data within the meaning of Art. 9 GDPR:

As a rule, no special categories of personal data are processed as part of service provision. In individual cases, the processing of special categories of personal data depends on the types of connections that run through the firewall.

1.4 Categories of data subjects concerned by the commissioned data processing

The data concerns the data of the following categories of data subjects:

The categories of data subjects concerned by commissioned data processing depend on the purpose of the client’s individual system. For example, it is possible, that personal data of the client’s employees or customers may be processed.

2. Designation of subcontractors

- No subcontractors are used as part of the Commissioned Data Processing.
- In accordance with section 8 of the FRAMEWORK AGREEMENT on the Commissioned Data Processing, the subcontractors listed below are used as part of the Commissioned Data Processing.

The following subcontractors process the data on behalf of the contractor for partial SERVICES of the Commissioned Data Processing:

Designation of subcontractor	Address Subcontractor	Description of the Commissioned Data Processing
SVA System Vertrieb Alexander GmbH	Borsigstraße 26 65205 Wiesbaden Deutschland	Support Check-Point
Fortinet Inc.	909 Kifer Road Sunnyvale, CA 94086 USA	Manufacturer support, where the knowledge of personal data cannot be excluded

¹ Special categories of personal data include: Data revealing the ethnic origin, political opinions, religious or philosophical beliefs or trade union membership as well as genetic data, biometric data, health data and data relating to sex life or sexual orientation.

3. List of permitted Commissioned Data Processing activities in third countries

- No data processing takes place within the scope of the Commissioned Data Processing in third countries.
- In accordance with Section 2 of the FRAMEWORK AGREEMENT, the Client consents to the Contractor and/or subcontractors in the third countries specified below to carry out parts of the Commissioned Data Processing:

Designation of subcontractor	Description of the Commissioned Data Processing provided in third countries	Third country designation
Fortinet Inc.	Manufacturer support, where the knowledge of personal data cannot be excluded	USA, Kanada

4. Additional arrangements on SERVICE-related technical and organisational measures

- As part of the provision of the services, the Contractor shall take the technical and organisational measures defined in ANNEX 2 of the FRAMEWORK AGREEMENT to ensure the security of the Commissioned Data Processing in accordance with Art. 32 GDPR.
- In addition to the technical and organisational measures defined in ANNEX 2 of the FRAMEWORK AGREEMENT, the contractor shall take the technical and organisational measures described below as part of the provision of the SERVICES to ensure the security of the Commissioned Data Processing in accordance with Art. 32 GDPR.

Description of SERVICE-related technical and organizational measures:

The SERVICE-related technical and organizational measures can be found in the service description.

- Instead of the technical and organisational measures defined in ANNEX 2 of the FRAMEWORK AGREEMENT, the contractor shall take the technical and organisational measures described below as part of the provision of the SERVICES to ensure the security of the Commissioned Data Processing in accordance with Art. 32 GDPR.

Description of SERVICE-related technical and organizational measures: