

## SERVICE-related description

# Phishing Awareness/Phishing Simulation

Version 1.0 (15.01.2024)

## 1. Designation and object of SERVICE

### 1.1 Object of Service:

The SERVICE relates to services in the area of „Phishing Awareness/Phishing Simulation “.

### 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:

- Conduct phishing simulations
- Providing an anonymised report with meaningful statistics on user behaviour
- Providing a domain for sending emails and visiting the landing page

### 1.3 Type of Data:

Commissioned Data Processing relates to the following types of data:

- First name, surname
- Employee email

### Special categories of data<sup>1</sup>:

- 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:

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<sup>1</sup> 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.

### 1.4 Categories of data subjects concerned by the commissioned data processing

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

- Employees of the client

## 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 |
|------------------------------|--|---|
| Hetzner Online GmbH          | Industriestr. 25,<br>91710 Gunzenhausen<br>Deutschland | Hosting of the application in the cloud         |
| Lucy Security AG             | Chamerstr. 44<br>6300 Zug<br>Schweiz                   | Manufacturer support and application deployment |

## 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 |
|------------------------------|---|---------------------------|
| Lucy Security AG             | Manufacturer Support  | Switzerland               |

## 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:

- 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: