

Privacy Policy of CERT Polska and Dyżurnet.pl

applicable as of 25 May 2018

CERT Polska Team is the first Polish Computer Emergency Response Team (hereinafter: CERT Polska), which operates within the structures of Naukowa i Akademicka Sieć Komputerowa - Państwowy Instytut Badawczy with its registered office at ul. Kolska 12.

Dyżurnet.pl is a team of experts of Naukowa i Akademicka Sieć Komputerowa - Państwowy Instytut Badawczy with its registered office at ul. Kolska 12 (hereinafter: NASK), which operates as a point of contact for reports of illegal content in the Internet, in particular content related to sexual abuse of children.

1. Policy objective

This Privacy Policy contains basic information about data processing performed in connection with the operations of CERT Polska and Dyżurnet.pl. We take all actions on the basis of legal regulations, in particular those concerning the protection of personal data. When processing your data, we make our best efforts to do it fairly and transparently, and protect your privacy.

2. Processing of personal data

The controller of your personal data processed by CERT Polska and Dyżurnet.pl is Naukowa i Akademicka Sieć Komputerowa - Państwowy Instytut Badawczy (NASK) with its registered office in Warsaw, ul. Kolska 12.

If you wish to exercise your rights (described in more detail below), you can turn to us in writing or by e-mail to the address of our Data Protection Officer: inspektorochronydanych@nask.pl.

Due to its activities, CERT Polska and Dyżurnet.pl can process personal data of Internet users for the purposes stemming from primary tasks of CERT Polska and Dyżurnet.pl, which are *inter alia*:

- to record and handle any events, which breach the network security;
- to respond actively when there is a direct threat for the users;
- to work with other CERT teams in Poland and worldwide;
- to participate in national and international projects related to ICT security topics;
- to conduct research on the methods of detection of security incidents;
to analyse malware and threat information exchange systems;
- to develop own tools to detect, monitor, analyse and correlate threats;
- to receive reports concerning illegal content in the Internet, in particular content related to sexual abuse of children.

CERT Polska and Dyżurnet.pl process personal data exclusively on in the basis of:

1. data subject's prior voluntary consent for the processing of his/her personal data (e.g. when registering for the SECURE conference or when reporting an incident through the form available at cert.pl);
2. legal obligation (e.g. when handling incident reports on national level, monitoring cyber security threats and incidents on national level, creating and providing tools for voluntary co-operation and exchange of information about cyber security threats and incidents, participating in the CSIRT network - *on the grounds of Annex I to the Directive (EU) 2016/1148 of the European Parliament and of the Council of 6 July 2016 concerning*

measures for a high common level of security of network and information systems across the Union; when providing service for a telephone line or an Internet service which operates in the area of reporting and analysing the cases of distribution, propagation or transmission of child pornography through information and communications technologies - on the grounds of the Directive (EU) 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on combating the sexual abuse and sexual exploitation of children and child pornography, and replacing Council Framework Decision 2004/68/JHA);

3. agreements signed with trusted Partners and counterparties with respect to notification of threats, vulnerabilities and incidents;
4. legitimate interest pursued by CERT Polska or Dyzurnet.pl or a third party (e.g. for scientific or historical research as well as for statistical purposes, in connection with the determination, pursue, or defence against claims).

CERT Polska and Dyzurnet.pl process personal data only to the extent necessary to achieve the purpose, for which the data was collected.

CERT Polska and Dyzurnet.pl declare that CERT Polska's sites function with the highest due diligence, good technical principles and principles of industrial professionalism as well as in compliance with applicable laws, in particular those which protect the privacy of Internet site users.

When using the incident report form at www.cert.pl or www.dyzurnet.pl, the data subject can make a free decision whether to provide or not to provide his/her data, however the provision of personal data may be required in a situation where the data subject is interested in receiving information regarding the handling of the incident reported on CERT Polska or Dyzurnet.pl site.

3. Time limit for the storage of personal data

CERT Polska and Dyzurnet.pl process personal data for a period not longer than is necessary for the purposes, for which such data is processed, in particular to handle an incident;

4. Personal data sharing

The personal data contained in the incident report and other information about incidents received through CERT Polska's site can be used to develop and manage processes aimed at the security of Internet users. In particular, such data can be made available to network administrators, other teams responding to network security breaches, or law enforcement authorities, also when located outside Poland.

The personal data contained in the incident report and other information about incidents received through Dyzurnet.pl's site can be used to develop and manage processes aimed at the security of Internet users. Personal data, in particular data of the person who made the report, cannot be made available to network administrators, other teams responding to network security breaches, or law enforcement authorities, also when located outside Poland.

5. Rights of users of CERT Polska and Dyzurnet.pl's sites

Anyone who reports an incident through CERT Polska or Dyzurnet.pl has the right to demand access to his/her data, rectification of his/her data, restricted use of his/her data and erasure of his/her data, and the right to transfer the data to another controller; when the data is processed on the basis of a consent - the right to withdraw the consent given; this will not affect the lawfulness of any data processing done on the basis of that consent before it was revoked. The form, in which such demand should be made, is specified at the time when the data is collected.

Anyone who reports an incident through CERT Polska or Dyżurnet.pl has also the right to object against the processing of his/her personal data and the right to lodge a complaint with the supervisory authority for personal data protection.

6. Cookies

CERT Polska and Dyżurnet.pl sites use cookies or other technologies with similar or identical functions i.e. information stored in terminal equipment of the Users who visit the sites. Cookies are downloaded automatically and used by the sites every time there is a connection with the User's terminal equipment.

Internet sites usually use cookies to:

- provide services,
- adjust the site content to the User's terminal equipment, remember the User's individual settings and optimise the use of the sites,
- improve the security, through control of abuse in the process of using the site,
- obtain collective, anonymous statistical data in order to improve sites' functionality,
- continue the User's session (concerns sites where Users have the option to log in), so that the User does not have to re-enter his/her login and password on each page on the site.

Cookies settings are specific for each Internet browser. You should know that the default option is that cookies are enabled. However, a user can switch off this option entirely or restrict, to a certain degree, the reception of cookies in his/her equipment. Please be informed that this may affect your comfort in using sites as well as cause most Internet pages not to display or to display incorrectly. In some cases, it is possible to configure the browser so that the request for user's consent for cookies is displayed every time. This gives the user the ability to control the cookies, but can slow down the browser.

CERT Polska and Dyżurnet.pl sites also use Cloudflare service as proxy servers in the Internet traffic to the sites, in order to improve the efficiency and availability of our services. You can find Cloudflare's privacy policy at: <https://www.cloudflare.com/security-policy/>.

NASK reserves that CERT Polska and Dyżurnet.pl sites do not collect, monitor or verify any information about the age of visiting users or any other information which, when collected, would permit to determine whether the user has legal capacity.

Site sharing

CERT Polska and Dyżurnet.pl sites can contain links to other entities' Internet pages. CERT Polska has no influence on the privacy policy pursued by those entities for their Internet pages and is not responsible for this policy.