PRIVACY NOTICE

ITPACK SHIELD - www.itpackshield.com

Effective: 26 September 2026
Last updated: 26 September 2026



1. Introduction

Heftner Group Kft. is committed to protecting personal data and to transparent data processing. This Privacy Notice explains what personal data Heftner Group Kft. processes in connection with the www.itpackshield.com website (the "Website") and its own processing activities related to the ITPACK SHIELD service, for what purposes and on what legal bases such data are processed, how long they are retained, who may receive the data, and what rights data subjects have.

This Privacy Notice does not replace the Data Processing Agreement (DPA) governing the processing of log and security event data originating from ITPACK SHIELD customer systems. Where Heftner Group Kft. processes personal data on behalf of a Customer and on the basis of the Customer's documented instructions, the DPA applies primarily to that processing.

Processing is governed in particular by Regulation (EU) 2016/679 of the European Parliament and of the Council (the "GDPR") and by applicable Hungarian and European Union data protection rules.

2. Data controller

Data controller: Heftner Group Kft.
Registered office: 2013 Pomáz, Vróci utca 12., Hungary
Company registration number: 13-09-123295
Tax number: HU12710658
E-mail: sales@it-pack.com
Technical support: support@it-pack.com
Website: www.itpackshield.com

For privacy-related questions or to exercise data subject rights, data subjects may contact the Controller at sales@it-pack.com.

3. Principles of processing

The Controller processes personal data lawfully, fairly and transparently, for specified and legitimate purposes. It seeks to apply data minimisation, maintain data accuracy, limit retention to what is necessary, and protect personal data through appropriate technical and organisational measures.

4. Contact, demo and pricing request forms

Data processed

- full name (Full Name);
- company or organisation name (Company Name);
- e-mail address;
- country (Country);
- number of employees (Number of Employees);
- area of interest or selected service (Interested In);
- message (Message);
- technical data relating to acceptance of the privacy notice;
- time the form is submitted;
- technical data necessary for operation and security.

Purpose and legal basis

The purposes of processing are to establish contact, respond to enquiries, arrange a demo or pricing discussion, carry out a preliminary assessment of needs, and conduct discussions prior to entering into a contract.

Where the data subject acts in their own name as a potential contracting party, the legal basis may be Article 6(1)(b) GDPR, namely steps taken at the request of the data subject prior to entering into a contract. Where the data subject acts as a contact person for a company or institution, the legal basis may be the legitimate interests under Article 6(1)(f) GDPR in conducting business communications and establishing a potential contractual relationship.

Retention period

If the enquiry does not result in a contract, the Controller retains the data for 12 months from the last substantive communication, unless a legal claim, statutory obligation or another appropriate legal basis justifies longer retention. If a contract is concluded, the necessary data may become part of customer relationship and contractual processing.

5. Individual pricing and technical assessment

The final price of ITPACK SHIELD can be determined based on the Customer's IT environment, data and log sources, log volume, systems, devices, sites, integration requirements, security environment and required service level. Much of this information is not personal data; however, where it contains information relating to an identifiable natural person, this Privacy Notice and the GDPR apply. The Controller does not request unnecessary personal data for pricing purposes.

6. Demo access

The Controller may provide limited demo access by means of a unique link, username, password or other authentication data.

Data processed

- name, e-mail address and organisation;
- username or technical identifier;
- secure technical data required for authentication;
- date of creation and expiry of access;
- technical and security log data associated with demo access.

Passwords must be handled using security procedures appropriate to the system in use; the Controller does not intend to store passwords in readable form.

Purpose, legal basis and retention

The purpose is to provide the demo securely, manage access and prevent unauthorised access. The legal basis is Article 6(1)(b) GDPR and, where applicable, the legitimate interests under Article 6(1)(f) GDPR. Access data are retained for the duration of the demo; necessary security log data may generally be retained for no longer than 30 days after demo access ends, unless a security incident investigation or legal claim justifies longer retention.

7. Newsletter and electronic marketing communications

Where newsletter or marketing subscription is available on the Website, it is based solely on the data subject's separate consent. Subscription is not a condition for contacting the Controller, requesting a demo, requesting pricing or using the service.

Data processed: name, where provided; e-mail address; subscription date; data necessary to demonstrate consent; and unsubscribe date.

Purpose: sending professional cybersecurity content, ITPACK SHIELD news, platform updates, guides and relevant commercial communications.

Legal basis: consent under Article 6(1)(a) GDPR and applicable electronic direct marketing rules.

Retention: until consent is withdrawn; limited data required to demonstrate the giving and withdrawal of consent may subsequently be retained for the period necessary in connection with potential legal claims.

Consent may be withdrawn at any time using the unsubscribe option provided in the newsletter or by sending a message to sales@it-pack.com. Withdrawal does not affect the lawfulness of processing carried out before withdrawal.

8. Customer relationship, contract and invoicing

If a contract is concluded, the Controller processes customer and contact-person data necessary to perform the service, including in particular the contact person's name, position, organisation, business e-mail address, other necessary contact details, contractual communications, service-related enquiries and, where they contain personal data, data required for invoicing.

The purposes are entering into and performing the contract, managing the customer relationship, providing the service, invoicing, complying with statutory obligations and handling legal claims. Depending on the circumstances, the legal basis is Article 6(1)(b), (c) or (f) GDPR.

Data are retained for the duration of the contract and thereafter for the statutory retention period applicable to the relevant data type or for the period necessary to establish, exercise or defend legal claims. Data associated with accounting records are retained in accordance with the applicable Hungarian accounting rules.

9. Technical support and fault reporting

Technical enquiries and fault reports relating to the ITPACK SHIELD service and devices supplied as part of the service may be submitted to support@it-pack.com.

Data processed may include: name, e-mail address, organisation, message, description of the fault, device identifier, technical data and system information necessary for investigation.

Purpose: investigating the issue, providing support and the replacement process, and maintaining the security and proper operation of the service.

Legal basis: performance of a contract or, for corporate contact persons, the legitimate interests under Article 6(1)(f) GDPR.

Retention: until the support case is closed and thereafter for the period necessary in connection with potential contractual or legal claims.

10. Log and security event data originating from ITPACK SHIELD customer systems

During the operation of ITPACK SHIELD, security events and log data originating from the Customer's IT systems may be processed. Depending on the source, these may contain IP addresses, user identifiers, authentication events, device identifiers, network events and other technical information relating to an identifiable natural person.

For these processing activities, the Customer generally determines the purposes and essential means of processing personal data, while Heftner Group Kft. acts as processor on the basis of the Customer's documented instructions. The detailed rules of such processing are set out in the ITPACK SHIELD Data Processing Agreement (DPA).

The primary processing of ITPACK SHIELD data takes place in the Customer's local IT environment. AI-assisted analysis operates locally within the ITPACK SHIELD service environment; Customer log and security event data are not transferred to an external public AI service for AI analysis.

The default retention period under the DPA for log and security event data is 30 days, unless the Customer and Heftner Group Kft. agree on a different period in documented form.

11. Backup, testing and troubleshooting within the ITPACK SHIELD service

Data required for the operation, backup, troubleshooting or testing of the service may, solely to the extent and for the period necessary, be transferred to an IT environment under the exclusive control of Heftner Group Kft. This does not constitute a transfer to an external public AI service or to an ITPACK SHIELD sub-processor.

During such operations, Heftner Group Kft. acts as the Customer's processor under the conditions set out in the DPA. Data must be deleted once the relevant purpose has been fulfilled or overwritten in accordance with the normal backup cycle, subject to the provisions of the DPA.

12. Remote access and VPN

For implementation, configuration, maintenance, support or Shield Care+ expert monitoring, the Customer may provide remote access via a secure VPN connection or another appropriately protected technical solution. Access may be used only for authorised tasks and only to the extent necessary. Customer data processed through such access are governed by the DPA.

13. Website technical logging and security

Technical log data may be generated during the operation of the Website and the systems serving it, including in particular IP address, access time, requested page or resource, browser and device information, HTTP status code and information relating to security events.

The purpose is to operate the Website securely, identify errors, detect abuse and protect IT systems. The legal basis is the Controller's legitimate interest under Article 6(1)(f) GDPR. Technical logs are retained only for as long as necessary for operation and security and, as a general rule, for no longer than 30 days, unless investigation of a specific security incident or a legal claim requires longer retention.

14. Google Analytics and measurement technologies

The Website may use Google Analytics to measure visits and usage. Where such measurement uses cookies or similar technologies that are not strictly necessary, they may be activated only after the visitor has given appropriate prior consent. Detailed information on cookies, providers, lifetimes and consent requirements is provided in the separate Cookie Notice.

Processing by Google and any international transfers are also subject to Google's current privacy and service terms. The Controller must configure the Website so that measurement technologies requiring consent are not activated before consent is given.

15. Google reCAPTCHA or similar bot protection

If the Controller activates Google reCAPTCHA or another bot-protection solution provided by an external service provider on Website forms, this Privacy Notice and the Cookie Notice will be supplemented before activation to reflect the actual implementation. This Privacy Notice does not in itself mean that such an external service is active on every form.

16. YouTube

The Website may contain video content hosted on or embedded from YouTube. When a video is loaded or played, the visitor's device may connect to YouTube/Google systems and technical data may be transmitted. Where the integration uses non-essential cookies or similar technologies, they may be activated - where required by applicable law - only after appropriate prior consent. Details are provided in the Cookie Notice.

17. LinkedIn and other external links

The Website may contain links to LinkedIn or other external services. The mere display of a simple external link does not in itself transmit personal data to LinkedIn. Processing after the external website is opened is governed by the privacy rules of the relevant provider.

18. Search engines and AI-based search services

Publicly accessible content on the Website may be crawled and indexed by traditional search engines and by AI-based search, indexing or information-processing services. Indexing of the public Website does not in itself constitute a transfer initiated by the Controller of visitors' personal data to those services. The Controller is not responsible for independent processing by third parties of publicly accessible internet content for their own purposes.

19. Cookies

The Website may use cookies and similar technologies. Strictly necessary technologies may be used for the operation of the Website; analytics, marketing or external-media technologies requiring consent may be activated only on the basis of appropriate prior consent. Cookie categories, purposes, providers, lifetimes and consent requirements are set out in the separate Cookie Notice.

20. Processors, service providers and recipients

Service providers used for the Website's own operation must be distinguished from sub-processors under the ITPACK SHIELD DPA. A Website hosting provider or domain registrar does not become a sub-processor of ITPACK SHIELD Customer data merely because it participates in operating the Website.

Under the current operating model, Heftner Group Kft. does not use an external sub-processor for processing falling within the scope of the ITPACK SHIELD DPA. If this changes, the DPA and the relevant information will be updated accordingly.

Provider / category	Role	Data concerned	Note
Sybell Informatika Kft.	Website hosting / technical hosting of the Website	Website technical and server log data and Website data stored on the hosting service	Provider used to operate the Website; not an ITPACK SHIELD sub-processor.
Intergity Kft.	E-mail service / e-mail infrastructure	E-mail addresses, sender and recipient data, message content, attachments and technical data associated with e-mail communication	Provider used for Heftner Group Kft. business and customer communications; not an ITPACK SHIELD sub-processor.
Websupport Magyarország Kft.	Domain registration and related technical services	Data necessary for the domain and related contact details	Not an ITPACK SHIELD sub-processor.
Google services	Analytics and, depending on the actual configuration, YouTube and other web technologies	Technical, usage and cookie data depending on the actual configuration	Functions requiring consent are activated only after appropriate prior consent.

21. International data transfers

Local processing and local AI analysis of ITPACK SHIELD Customer log and security event data do not in themselves involve a transfer outside the European Economic Area (EEA). Customer data are not transferred to an external public AI service for AI analysis.

Certain international technology services used on the Website - in particular certain Google services - may, however, involve transfers of personal data outside the EEA. Such transfers may take place only in accordance with Chapter V GDPR, for example on the basis of an adequacy decision, appropriate safeguards or another applicable transfer mechanism.

22. Automated decision-making and artificial intelligence

ITPACK SHIELD uses AI-assisted analysis and decision-support functions. A security analysis, summary or recommendation produced by the platform does not in itself constitute a decision based solely on automated processing that produces legal effects concerning a natural person or similarly significantly affects that person. The function is intended to support the assessment of security events and human decision-making.

AI analysis is performed locally within the ITPACK SHIELD service environment; Customer data to be analysed are not transferred to an external public AI service for AI analysis.

23. Data security

The Controller applies technical and organisational measures proportionate to the risks in order to protect the confidentiality, integrity and availability of personal data. These may include, in particular, access restrictions, appropriate authentication, network security, secure remote access, system and security logging, update and vulnerability management, backup, recovery and incident management.

The Controller does not publish detailed network, system, access or security configurations where disclosure could reduce the security of ITPACK SHIELD, the Website or Customer systems.

24. Rights of data subjects

Subject to the applicable conditions, data subjects have the right to request information and access, request rectification of inaccurate data, request erasure of personal data or restriction of processing, object to processing based on legitimate interests, exercise the right to data portability where the applicable conditions are met, and withdraw consent at any time where processing is based on consent.

Requests may be submitted to sales@it-pack.com. The Controller handles requests in accordance with the rules and time limits laid down in the GDPR. The exercise of certain rights may be subject to statutory conditions and limitations.

25. Complaints and legal remedies

Data subjects have the right to lodge a complaint with the competent data protection supervisory authority. In Hungary, the supervisory authority is the Hungarian National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság - NAIH); its current contact details are available on the NAIH official website. Data subjects may also seek judicial remedies in accordance with applicable law.

26. Amendments to this Privacy Notice

The Controller may amend this Privacy Notice, in particular where the Website, the ITPACK SHIELD service, the technologies used, processors, recipients or legal requirements change. The version in force from time to time is published on www.itpackshield.com. In the event of a material change, the Controller will inform data subjects in a manner appropriate to the circumstances and applicable law.

27. Contact

Heftner Group Kft.
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Company registration number: 13-09-123295
Tax number: 12710658-2-13
E-mail: sales@it-pack.com
Technical support: support@it-pack.com
Website: www.itpackshield.com