

# Privacy Policy

Effective Date: April 11, 2026 | Version 1.0 | GDPR Compliant | Last Updated: April 12, 2026

*This document is prepared for AT holding, s. r. o. operating the ScanGuard platform. Have this document reviewed by a qualified legal professional before publishing.*

## 1. Data Controller

The data controller responsible for processing your personal data is AT holding, s. r. o., registered at Sartorisova 11, 821 08 Bratislava - mestská časť Ružinov, Slovak Republic, registration number IČO 55253938.

Data Protection Contact: Data Protection Officer, AT holding, s. r. o.

Email: [scanguard@scanguard.tech](mailto:scanguard@scanguard.tech)

Supervisory Authority: Office for Personal Data Protection of the Slovak Republic

## 2. Personal Data We Collect

### 2.1 Account Data (Customers)

- Full name and email address (provided during registration)
- Company name and role (optional)
- Billing information (processed by Stripe; we do not store credit card numbers)
- Subscription plan and payment history
- Communication preferences

### 2.2 Technical Data (Website Visitors)

- IP address (anonymized after 30 days)
- Browser type, operating system, and device information
- Pages visited, referral source, and session duration
- Session cookies (strictly necessary — see Cookie Policy)

### 2.3 Scan Data

- Target domains and IP addresses submitted by the Customer
- Scan configuration and scheduling parameters
- Scan results including identified vulnerabilities, HTTP responses, and technical metadata
- Generated reports (PDF/dashboard)

Important: ScanGuard is designed to minimize personal data collection during scans. Any personal data inadvertently discovered during scanning (e.g., email addresses in exposed configuration files) is automatically redacted in reports. We do not intentionally collect, store, or process personal data of individuals associated with scanned target systems.

### 2.4 Enterprise Contact Form

- Name, email, company, role, employee count
- Message content and compliance requirements specified

## 3. Legal Basis for Processing (GDPR Article 6)

Processing Activity	Legal Basis	GDPR Article
Account creation & management	Performance of contract	Art. 6(1)(b)
Payment processing (via Stripe)	Performance of contract	Art. 6(1)(b)
Vulnerability scanning (Customer's assets)	Performance of contract	Art. 6(1)(b)
Website analytics (anonymized)	Legitimate interest	Art. 6(1)(f)
Email communications (service updates)	Performance of contract	Art. 6(1)(b)
Marketing communications	Consent	Art. 6(1)(a)
Enterprise inquiry form	Pre-contractual measures	Art. 6(1)(b)
Legal compliance (tax, fraud prevention)	Legal obligation	Art. 6(1)(c)
Security & abuse prevention	Legitimate interest	Art. 6(1)(f)

## 4. Data Sharing and Third-Party Processors

We share personal data only with the following categories of recipients:

Processor	Purpose	Data Shared	Location
Stripe, Inc.	Payment processing	Name, email, payment method	EU (Ireland)
Hetzner Online GmbH*	Infrastructure hosting	All service data	EU (Germany)
SMTP provider*	Transactional emails	Email address, name	EU
Interactsh (self-hosted)*	OOB verification	Scan metadata (no PII)	EU (self-hosted)

\* Subject to change. Actual providers will be listed in the final version.

No data is transferred outside the EU/EEA. All infrastructure, databases, and processing servers are located within the European Union. Should this change, we will update this Privacy Policy and implement appropriate safeguards (Standard Contractual Clauses or adequacy decisions) in compliance with GDPR Chapter V.

We do not sell, rent, or trade your personal data to third parties for marketing purposes.

## 5. Data Retention Periods

Data Category	Retention Period	Basis
Account data	Duration of account + 30 days	Contractual necessity
Billing records	10 years from transaction	Tax/legal obligations (Slovak law)
Scan results & reports	12 months from scan date	Service delivery
Server logs (anonymized)	90 days	Security & troubleshooting
Contact form submissions	12 months	Pre-contractual measures
Marketing consent records	Until consent withdrawn + 3 years	Accountability (Art. 5(2))

## 6. Your Rights Under GDPR

As a data subject, you have the following rights under the GDPR:

- Right of Access (Art. 15): Request a copy of your personal data we hold.
- Right to Rectification (Art. 16): Request correction of inaccurate data.
- Right to Erasure (Art. 17): Request deletion of your data ("right to be forgotten").
- Right to Restriction (Art. 18): Request restriction of processing in certain cases.
- Right to Data Portability (Art. 20): Receive your data in a structured, machine-readable format.
- Right to Object (Art. 21): Object to processing based on legitimate interests or for direct marketing.
- Right to Withdraw Consent (Art. 7(3)): Withdraw previously given consent at any time.

To exercise any of these rights, contact us at [scanguard@scanguard.tech](mailto:scanguard@scanguard.tech). We will respond to your request within 30 days. If we need additional time, we will inform you within the initial 30-day period with reasons for the extension (up to 60 additional days).

If you believe your data protection rights have been violated, you have the right to lodge a complaint with the Office for Personal Data Protection of the Slovak Republic or the supervisory authority in your EU member state of residence.

## 7. Security Measures

We implement appropriate technical and organizational measures to protect your data:

- Encryption in transit (TLS 1.2+) and at rest (AES-256)
- Ephemeral scanning architecture — worker containers are destroyed after each scan
- Network namespace isolation between scanning jobs
- Role-based access control for internal systems
- Regular security assessments of our own infrastructure

- Audit logging of all administrative and scanning operations
- Incident response procedures with 72-hour breach notification (GDPR Art. 33)

## 8. Children's Privacy

The Service is not directed at individuals under the age of 18. We do not knowingly collect personal data from minors. If we become aware that we have inadvertently collected data from a minor, we will take steps to delete such data promptly.

## 9. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. Material changes will be communicated via email to registered users at least 30 days before they take effect. The "Effective Date" at the top of this document indicates the date of the latest revision.

## 10. Contact Information

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