

Product - Processing Details (Last Updated: May 13, 2026)

The Processing Details by Product below describe the applicable key details of the Personal Data Arctic Wolf processes as part of providing the applicable Product to our customers. These processing details may be updated by Arctic Wolf from time to time and will, to the extent required, notify customers of material changes.

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Processing Details for Aurora Managed Detection and Response (MDR), Aurora Vulnerability Management (formerly Managed Risk), and Aurora Security Awareness & Training (ASAT, formerly Managed Security Awareness (MA))

A. LIST OF PARTIES

Data exporter(s):

Data exporter is the customer of data importer subscribing to the Products described in the Agreement executed by the parties for the delivery of Managed Detection and Response and/or Aurora Vulnerability Management (formerly Managed Risk), and Aurora Security Awareness & Training (ASAT, formerly Managed Security Awareness (MA)) solutions (collectively "Products").

Activities relevant to the data transferred under these Clauses:

Activities relevant to the data transferred under these Clauses: Data exporter is a business which processes Personal Data in the delivery of the Products.

Data Exporter's role is Controller.

Data importer(s):

Data Importer is Arctic Wolf Networks, Inc., a provider of the Products.

Address: 8939 Columbine Road, Suite 150, Eden Prairie, MN 55347

Contact person's name, position and contact details:

Pursuant to Article 27 of the UK GDPR, Arctic Wolf Networks, Inc. has appointed EDPO UK Ltd as its GDPR representative in the UK. You can contact EDPO UK regarding matters pertaining to the UK GDPR:

- by using EDPO's online request form: <https://edpo.com/uk-gdpr-data-request/>
- by writing to EDPO UK Ltd, Unit 33, Waterside, Schooner Court, 44-48 Wharf Road, London, N1 7UX, United Kingdom

Pursuant to Article 27 of the EEA GDPR, Arctic Wolf Networks, Inc. has appointed IITR Cert GmbH as its GDPR representative in the EEA. You can contact IITR Cert GmbH regarding matters pertaining to the EEA GDPR:

- by writing to IITR Cert GmbH, Dr. Sebastian Kraska, Data Protection Representative, Eschenrieder Str 62c, 82194 Groebenzell, Germany
- by email to email@iitr.de

Activities relevant to the data transferred under these Clauses:

Data importer is a vendor of data exporter and has contracted with data exporter for the delivery of data importer's Products which may require the processing of Personal Data and transfer of Personal Data to the US.

B. DESCRIPTION OF TRANSFER

Categories of data subjects whose personal data is transferred

Data Subjects include, but are not limited to, Product users (Administrators), employees, contractors, agents, and other third parties

Categories of personal data transferred

Personal Data includes but is not limited to:

Contact information and information required to set up and deliver the Products: names, email addresses, postal address, phone numbers, user names, passwords, IP addresses, geolocation data, device ID.

Operational system log data provided by Data Exporter to Data Importer for the delivery of the Products, including, but not limited to operational values, event logs, and network data such as flow, HTTPS, TLS, DNS metadata, cursory inventory data, operating systems and versions, users and groups from Active Directory, system level inventory, event data, and network vulnerability data

Sensitive data transferred (if applicable) and applied restrictions or safeguards that fully take into consideration the nature of the data and the risks involved, such as for instance strict purpose limitation, access restrictions (including access only for

staff having followed specialised training), keeping a record of access to the data, restrictions for onward transfers or additional security measures.

The personal data transferred should not contain special categories of data, unless otherwise provided by Data Exporter.

The frequency of the transfer (e.g. whether the data is transferred on a one-off or continuous basis).

Personal Data is transferred on an ongoing basis for the term of the Agreement.

Nature of the processing

The processing is as set forth in the governing Agreement executed by the Data Exporter and Data Importer as it pertains to the delivery of Data Importer's Products to the Data Importer.

Purpose(s) of the data transfer and further processing

Data Importer processes the Personal Data in accordance with the instructions of the Data Exporter as set forth in the Agreement and the Data Protection Addendum.

The period for which the personal data will be retained, or, if that is not possible, the criteria used to determine that period

Contact information and information required to set up and perform the Products are retained during the Product subscription term for use in accordance with the Agreement.

Operational systems log data is retained for the retention period purchased by Data Exporter and returned or destroyed by Data Importer in accordance with the terms of the Agreement or as requested by Data Exporter.

For transfers to (sub-) processors, also specify subject matter, nature and duration of the processing

Subprocessors process Personal Data to permit Data Importer's delivery of the Products to Data Exporter in accordance with the terms of the Agreement and are subject to terms and conditions, including terms related to duration of processing, no less restrictive than those required of Data Importer pursuant to the terms of the Agreement. The purpose of processing is set forth on Data Importer's subprocessor list.

C. COMPETENT SUPERVISORY AUTHORITY

Identify the competent supervisory authority/ies in accordance with Clause 13

Irish Supervisory Authority

Processing Details for IR360 Retainer (or legacy IR JumpStart Retainer (IRJS)), Cyber Defense Operations Services (CDO), Cyber JumpStart Portal, Aurora Incident Response Services (IR)

A. LIST OF PARTIES

Data exporter(s):

Data exporter is the Customer of data importer subscribing or purchasing, as appropriate, the IR360 Retainer (or formerly IRJS Retainer), CDO, Cyber JumpStart Portal modules, or Incident Response Services (collectively, the “Products”) described in the General Terms and reflected on an Order Form.

Activities relevant to the data transferred under these Clauses:

Activities relevant to the data transferred under these Clauses: Data exporter is a business which processes Personal Data in the delivery of the Products.

Data Exporter’s role is Controller.

Data importer(s):

Data Importer is Arctic Wolf Networks, Inc., a provider of Products.

Address: 8939 Columbine Road, Suite 150, Eden Prairie, MN 55347

Contact person’s name, position and contact details:

Pursuant to Article 27 of the UK GDPR, Arctic Wolf Networks, Inc. has appointed EDPO UK Ltd as its GDPR representative in the UK. You can contact EDPO UK regarding matters pertaining to the UK GDPR:

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- by writing to IITR Cert GmbH, Dr. Sebastian Kraska, Data Protection Representative, Eschenrieder Str 62c, 82194 Groebenzell, Germany
- by email to email@iitr.de

Activities relevant to the data transferred under these Clauses:

Data importer is a vendor of data exporter and has contracted with data exporter for the delivery of data importer’s Products which may require the processing of Personal Data and transfer of Personal Data to the US.

Data Importer’s role is Processor.

B. DESCRIPTION OF TRANSFER

Categories of data subjects whose personal data is transferred

Data Subjects include data exporter’s employees, contractors, agents, vendors, customers, and any such other persons with whom Controller transacts business and whose information is contained within the compromised systems, files and data provided to data importer for purposes of delivery of the Products.

Categories of personal data transferred

Personal Data includes names, email addresses, phone numbers, usernames, passwords, IP addresses, domain names, geolocation data, device ID, other system log metadata, business information, emails, insurance policy numbers and limits, financial information which may include any category of Personal Data if Customer transmits such Personal Data to Arctic Wolf.

Sensitive data transferred (if applicable) and applied restrictions or safeguards that fully take into consideration the nature of the data and the risks involved, such as for instance strict purpose limitation, access restrictions (including access only for staff having followed specialised training), keeping a record of access to the data, restrictions for onward transfers or additional security measures.

For purposes of IR Services, Customer may provide Arctic Wolf with special categories of Personal Data, including protected health information, passport details, employment information, financial account information, and any other sensitive information which may be included in any compromised systems, files and data provided by Customer to Arctic Wolf for purposes of delivery of such Product.

The frequency of the transfer (e.g., whether the data is transferred on a one-off or continuous basis).

Personal Data is transferred on an ongoing basis for the term of the Agreement.

Nature of the processing

The processing is as set forth in the governing Agreement executed by the Data Exporter and Data Importer as it pertains to the delivery of Data Importer's Products to the Data Exporter.

Purpose(s) of the data transfer and further processing

Data Importer processes the Personal Data in accordance with the instructions of the Data Exporter as set forth in the Agreement and the Data Protection Addendum.

The period for which the personal data will be retained, or, if that is not possible, the criteria used to determine that period

Contact information and information required to set up and perform the Products are retained during the term of the Agreement for use in the administration and back-office processing of the Product engagement.

Incident Evidence, CDO Data, Points of Contact Information, and Security Profile Data (as defined in the applicable Agreement) will be returned or destroyed by Data Importer in accordance with the terms of such applicable Agreement.

For transfers to (sub-) processors, also specify subject matter, nature and duration of the processing

Subprocessors process Personal Data to permit Data Importer's delivery of the Products to Data Exporter in accordance with the terms of the Agreement and are subject to terms and conditions, including terms related to duration of processing, no less restrictive than those required of Data Importer pursuant to the terms of the Agreement. The purpose of processing is set forth on Data Importer's subprocessor list.

C. COMPETENT SUPERVISORY AUTHORITY

Identify the competent supervisory authority/ies in accordance with Clause 13

Irish Supervisory Authority

Aurora Endpoint Security Products (including Aurora Protect, Aurora Endpoint Defense, Aurora Managed Endpoint Defense on Demand, Aurora Managed Endpoint Defense, Aurora Mobile Threat Defense, and legacy CylanceENDPOINT, CylanceEDGE, and CylanceMDR)

A. List of Parties

Data exporter(s)	Details
Name:	Customer, a user of the Solutions
Address:	Address as listed in the Agreement
Contact person's name, position and contact details:	Contact information as listed in the Agreement
Activities relevant to the data transferred under these Clauses:	Activities relevant are described in Part B below
Role (controller/processor):	Controller (or processor, if Customer is acting on behalf of another controller)

Data importer(s):	Details/Descriptions
Name:	Arctic Wolf Networks, Inc.
Address:	Address listed in the Agreement
Contact person's name, position and contact details:	see below
Activities relevant to the data transferred under these Clauses:	Activities relevant are described in Part B below
Role (controller/processor):	Processor (or subprocessor, if Customer is acting as processor on behalf of another controller)

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- by email to email@iitr.de

B. Description of Transfer

Categories of data subjects whose personal data is transferred

The categories of data subjects whose personal data is transferred are determined solely by the Data Exporter. In the normal course of the Data Importer's Solutions, the categories of data subject might include (but are not limited to): the Data Exporter's personnel, customers, service providers, business partners, Affiliates, and other End Users.

Categories of personal data transferred

The categories of personal data transferred are determined solely by the Data Exporter. In the normal course of the Data Importer's Solutions, the categories of personal data transferred might include (but are not limited to): first name, last name, business title, business address, business email address, phone number, in order to deliver our requested Solutions.

The Software products as part of Solutions process system and application data, which may include the following data, some of which may be personal data:

- End user contact information: such as first and last names, phone numbers, email addresses and mobile phone numbers, addresses, and location (not real-time)
- Account information: such as account name, full name, unique identifiers, local group memberships, account status, account activity
- Endpoint network activity: such as destination IP address, destination port, process name, image path, hostname, URLs, source port / IP address
- Endpoint information: such as serial number, model, OS, free space, battery level, distinguished name, group membership, MAC addresses, installed applications, process information, user activity, event logs
- Geolocation data: By default precise geolocation is collected only when the end user has explicitly granted permission. Approximate location is derived from source IP address.

The Data Importer does not intentionally or knowingly process any special categories of personal data. However, the categories of personal data transferred are determined solely by the Data Exporter.

The frequency of the transfer (e.g., whether the data is transferred on a one-off or continuous basis)

Continuous with use of the Solutions.

Nature and purpose of the processing

The provision of the Solutions to Data Exporter in accordance with the Agreement.

Purpose(s) of the data transfer and further processing

To provide the Solutions to Customer as described in the Agreement.

The period for which the personal data will be retained, or, if that is not possible, the criteria used to determine that period

For as long as necessary to provide the Solutions as described in the Agreement, as legally or contractually required, or upon receipt of Customer's written request for deletion.

For transfers to subprocessors, also specify subject matter, nature, and duration of the processing

The subject matter, nature and duration of the processing are specified above and in the Agreement.

C. Competent Supervisory Authority

Identify the competent supervisory authority lies in accordance with Clause 13

Irish Supervisory Authority.

Processing Details for Aurora Attack Surface Management

A. List of Parties

Data exporter(s)	Details
Name:	Customer, a user of the Solutions
Address:	Address as listed in the Agreement
Contact person's name, position and contact details:	Contact information as listed in the Agreement
Activities relevant to the data transferred under these Clauses:	Activities relevant are described in Part B below
Role (controller/processor):	Controller (or processor, if Customer is acting on behalf of another controller)

Data importer(s):	Details/Descriptions
Name:	Arctic Wolf Networks, Inc.
Address:	Address listed in the Agreement
Contact person's name, position and contact details:	see below
Activities relevant to the data transferred under these Clauses:	Activities relevant are described in Part B below
Role (controller/processor):	Processor (or subprocessor, if Customer is acting as processor on behalf of another controller)

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- by email to email@iitr.de

B. Description of Transfer

Categories of data subjects whose personal data is transferred

The categories of data subjects whose personal data is transferred are determined solely by the Data Exporter. In the normal course of the Data Importer's Solutions, the categories of data subject might include (but are not limited to): the Data Exporter's employees, contractors, directors, staff, partners, and end users.

Categories of personal data transferred

The categories of personal data transferred are determined solely by the Data Exporter. In the normal course of the Data Importer's Solutions, the categories of personal data transferred might include (but are not limited to): IP Addresses, username, MAC addresses, geo location (sourced from public IP address data), DNS names, email addresses, postal addresses, first and last name, employer name, business department, and phone number, in order to deliver the requested Solutions.

The Data Importer does not intentionally or knowingly process any special categories of personal data. However, the categories of personal data transferred are determined solely by the Data Exporter.

The frequency of the transfer (e.g., whether the data is transferred on a one-off or continuous basis)

Continuous with use of the Solutions.

Nature and purpose of the processing

The provision of the Solutions to Data Exporter in accordance with the Agreement.

Purpose(s) of the data transfer and further processing

To provide the Solutions to Customer as described in the Agreement.

The period for which the personal data will be retained, or, if that is not possible, the criteria used to determine that period

For as long as necessary to provide the Solutions as described in the Agreement, as legally or contractually required, or upon receipt of Customer's written request for deletion.

For transfers to subprocessors, also specify subject matter, nature, and duration of the processing

The subject matter, nature and duration of the processing are specified above and in the Agreement.

C. Competent Supervisory Authority

Identify the competent supervisory authority lies in accordance with Clause 13

Irish Supervisory Authority.