

# IPS Data Taxonomy White Paper

## Personal Data

The purpose of this document is to provide IPS customers with clear and transparent information on how IPS collects, uses, processes, and protects Personal Data when acting as your Processor under applicable data protection laws.

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### 1. What is Personal Data?

Personal Data refers to any electronic information submitted by you or on your behalf to IPS Products or Services that:

1. Relates to an identified or identifiable natural person, or
2. Is considered “personal data,” “personal information,” “personally identifiable information,” or any equivalent term as defined under applicable privacy and data protection regulations.

This definition is further referenced in the IPS Customer Data Processing Addendum (DPA).

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### 2. What do we use Personal Data for?

IPS processes Personal Data solely for the following purpose:

**Purpose:** To deliver IPS Products and Services and to fulfill our obligations under the Agreement and/or DPA.

**Benefit to the Customer:** Processing Personal Data allows IPS platforms and services to operate as designed—enabling core functionality, secure access, reporting, threat analysis, troubleshooting, and supported product performance as part of routine operations.

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### 3. Core Principles

IPS adheres to the following core principles when processing Personal Data:

#### I. Processing Under Customer Instruction

IPS processes Personal Data strictly in accordance with:

- The Privacy & Security Datasheets of the Products and Services purchased,
- Applicable data protection laws, and
- The IPS Customer Data Processing Addendum (or equivalent agreement).

These documents collectively define your instructions to IPS. IPS imposes identical restrictions on all approved subcontractors and sub-processors.

#### II. Confidentiality & Security

All Personal Data is treated as confidential and protected using IPS' documented Information Security Measures, aligned with Zero Trust and global best practices.

#### III. Limited Disclosure

IPS will only disclose Personal Data to:

1. Authorized third-party sub-processors required to deliver IPS Products and Services;  
and
2. IPS affiliates involved in service delivery.

IPS does not disclose Personal Data unless required by applicable law or a valid order from a competent governmental authority.

#### IV. No Use of Personal Data for AI Training

IPS and its affiliates do not train generative AI systems using customer Personal Data. This prohibition also applies to IPS sub-processors.

## **V. Customer Control**

You determine which Personal Data is submitted to IPS platforms or services and remain in full control of such data.

## **VI. International Transfers**

When necessary to provide services, IPS may process Personal Data outside the country or region in which it was collected.

All transfers comply with legally recognized mechanisms such as:

- Standard Contractual Clauses (SCCs),
- Adequacy decisions, or
- Region-specific data-transfer frameworks.

IPS only transfers Personal Data where a lawful transfer mechanism is in place.

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## **4. Interaction with Other Data Types**

### **Customer Data**

If Customer Data contains Personal Data, IPS will process it in accordance with:

- Applicable privacy laws, and
- The IPS Customer Data Processing Addendum.

(See the Customer Data White Paper for additional details.)

### **Systems Data**

IPS Systems Data may occasionally include incidental Personal Data (e.g., IP addresses in logs).

Such incidental data is processed in line with:

- Applicable privacy laws,
- The IPS DPA, and
- The IPS Online Privacy Statement.

(See the Systems Data White Paper for more details.)

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## 5. How IPS Secures Personal Data

IPS implements robust technical and organizational controls, documented in the IPS Information Security Measures, which form part of the IPS End User License Agreement (EULA).

These controls include—but are not limited to—Zero-Trust enforcement, encryption, access governance, monitoring, auditing, secure engineering, and continuous risk management across IPS platforms.

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## 6. Examples of Personal Data

Examples of Personal Data processed by IPS may include:

- Username
  - Email address
  - IP address that is reasonably capable of identifying an individual
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## About This White Paper

This document provides information for transparency purposes and may be updated periodically to reflect evolving technologies, services, and regulatory requirements.