



## GlobalSign Data Protection Policy

### Version 1.7

**IMPORTANT NOTICE:** YOU MUST READ THE GLOBALSIGN CERTIFICATION PRACTICE STATEMENT (HEREUNDER, CPS) BEFORE APPLYING FOR A CERTIFICATE: <http://www.globalsign.net/repository/> THIS GLOBALSIGN DATA PROTECTION POLICY DOES NOT REPLACE PARTIALLY OR IN WHOLE THE GLOBALSIGN CERTIFICATION PRACTICE STATEMENT, WHICH ULTIMATELY CONTROLS THE PROVISION OF PUBLIC CERTIFICATION SERVICES OF GLOBALSIGN.

Whereas,

GlobalSign offers public certification services as explained in the Certification Practice Statement (hereunder CPS).

GlobalSign holds and operates resources for the processing of personal data.

GlobalSign collects personal data from individuals requesting a Public Key Infrastructure (PKI) product or service with a view to establish their identity according to the procedures and for the purposes described below.

It now supports its practices with this policy statement applying to the entire range of PKI products and services, and all sites in the GlobalSign network. This Policy statement describes in detail the position of GlobalSign regarding the protection of personal data of the applicants and subscribers of GlobalSign PKI products and services.

### 1. Information collected

GlobalSign public certification products and services are intended to serve humans. GlobalSign is committed to protecting the privacy of the applicants and subscribers of its public certification services. GlobalSign uses the personal information collected to process applications for digital certificates and provide a personalized service where possible.

### 2. Registration

GlobalSign has registered with the competent authorities as required by law regarding its collecting, processing and archiving of personal data. You may refer to the competent authority named below to obtain further information regarding this registration:

Commissie voor de Bescherming van de Persoonlijke Levenssfeer Regentschapstraat 61 1000 Brussel België	Commission pour la Protection de la Vie Privé Rue de la Régence, 61 1000 Bruxelles Belgique	Commission for the Protection of Personal Data Rue de la Régence 61 1000 Brussels Belgium
---	--	--

### 3. Applicability

GlobalSign's public certification services for which personal data may be collected include but is not limited to the following types of certificates and services:

- **Certificates:-**
  - PersonalSign 2 certificate,
  - PersonalSign 2 PRO certificate,
  - PersonalSign 3 certificate,
  - PersonalSign 3 PRO certificate,
  - OrganizationSSL certificate,
  - ExtendedSSL certificate,
  - DomainSSL certificate,
  - Code Signing certificate,
  - Trusted Root certificates.
  - GlobalSign Administrative certificates.
  - DocumentSign certificates
- **Services:-**
  - Global Agent System (GAS) certificate lifecycle management console.

This policy does not apply to PersonalSign 1 certificates and test or demo certificates.

This policy applies to personal data collected for any other purpose by GlobalSign

### 4. Follow relevant laws

GlobalSign commits itself to protect the personal information applicants and subscribers of its public certification services submit. GlobalSign declares to fully respect all rights established and laid out in European and Belgian Law and operates within the limits of the:

- European Directive 95/46 on the protection of individuals with regard to the processing of personal data and on the free movement of such data.
- Laws of Belgium regarding the protection of personal data
- Provisions of the GlobalSign CPS.

### 5. GlobalSign assurances

GlobalSign assures applicants and subscribers that it follows the rules set out below:

1. **Legal notice:** GlobalSign makes practical efforts to provide legal notice to subscribers on the legal terms concerning issuing GlobalSign digital certificates. A published CPS and related agreements and information including but not limited to a warranty plan, a relying parties agreement and this data protection policy statement are made available through <http://www.globalsign.net/repository>
2. **Only PKI services:** GlobalSign uses PKI based services and products while it makes no usage of biometric or other means of identification.
3. **Collecting personal data:** GlobalSign only collects personal data that is necessary for the proper operation of digital certification.
4. **Proportionality:** GlobalSign may only request the e-mail address and the name of an applicant or subscriber while for certain types of certificates like for GlobalSign class 2 certificates and GlobalSign class 3 Pro certificates it may require additional information to be submitted, including an identification number, date of birth etc.
5. **Credit card information:** GlobalSign may collect credit card information from the applicants of its products and services as it sees appropriate to fulfill payment

requirements. GlobalSign uses this information for payment purposes only, while it makes no further processing of it.

6. **Strict identification procedures**: GlobalSign uses strict identification procedures to positively establish the identity of an applicant or subscriber. The procedures GlobalSign uses are either paper-based or electronic with a view to provide adequate assurances to relying parties about the identity of the subscriber.
7. **Establish the identity of the subscriber**: GlobalSign only collects personal data related to the core function of a PKI activity with a view to establish the identity of a subscriber and issue a digital certificate upon which others parties, called relying parties, may rely.
8. **Redundant data**: In the context of art. 3 GlobalSign collects no data revealing racial or ethnic origin political opinions, religious and philosophical beliefs, trade union membership and the processing of data concerning health or sex life.
9. **Personally submitted data**: GlobalSign only collects data directly from an applicant or subscriber. It has the right to consult third-party databases to verify this data.
10. **Legal disclosures of personal data**: GlobalSign only discloses personal data as required by law. In those instances GlobalSign pledges to inform the applicant or subscriber of such disclosures if allowed by law.
11. **No trading of personal data**: GlobalSign does not sell, trade, exchange or otherwise make available to third parties personal information regarding applicants and subscribers unless so required by law.
12. **No escrow**: GlobalSign neither compiles nor uses key escrow listing keys of the subscribers of its products or services. GlobalSign is only responsible for the good order of its own private key.
13. **Personnel**: All members of the personnel of GlobalSign are of good standing and character including those members handling personal data. GlobalSign makes appropriate controls on the members of its staff with a view to deliver trustworthy PKI services.
14. **Due authorization**: All members of the personnel of GlobalSign that handle personal data have been duly authorized to do so. Consistent with Belgian Privacy and Employment Law requirements, the members of the personnel of GlobalSign also attest to handle personal data lawfully.

### Cookie policy

15. **Cookie policy**: GlobalSign does not use cookies to collect personal information. GlobalSign may use cookies for guidance of applicants after initiating the registration process.
16. **Appended URLs**: GlobalSign maintains the state of an applicant and subscriber of its services by appending a unique identification number to the URL in the browser of the applicant or subscriber. For an applicant or subscriber the clear advantage of using appended URLs as opposed to setting cookies is that information stored in a computer is deleted as soon as the user exits the browser program. The applicant or subscriber stays firmly in control regarding the information she releases to the GlobalSign server.
17. **User profiles**: GlobalSign does not use submitted personal data to compile user profiles.

18. **Visitors:** GlobalSign does not collect information from visitors of its www site unless explicitly submitted, requested and intentionally submitted by an applicant or subscriber of its services for the purpose of issuing a GlobalSign certificate or collecting information about GlobalSign and GlobalSign services.
19. **Links:** GlobalSign may use links to other www sites as it sees appropriate. GlobalSign makes no representations regarding the protection of personal data offered in those www sites.
20. **Independent CA:** GlobalSign makes every possible effort to remain a self standing independent CA operating within the legal framework set out by the laws of the EU and Belgium.
21. **Advertisement:** GlobalSign may advertise on Web sites, but will not reveal personal information.
22. **Property:** Personal data and data bases of personal data submitted by applicants and subscriber is property of GlobalSign.

### Trans-border data flows

23. **Trans-border data flows:** GlobalSign operates a network of Registration Authorities (RAs) and Local Registration Authorities (LRAs) worldwide. Within this GlobalSign Network transmissions of personal data take place from the GlobalSign RAs and GlobalSign LRAs to GlobalSign where this data is finally processed and stored ahead of authorizing issuing a certificate.
24. **EU level privacy protection:** Historically, the Laws of the EU have been offering the highest level of personal Privacy in the world. GlobalSign does not discriminate in providing personal Privacy between users residing within the EU and those not. By allowing transmissions of personal data from countries with low or no Privacy regulation to GlobalSign in Belgium, GlobalSign can effectively extend its EU level Data Protection and Privacy policies to applicants and subscribers residing in countries outside the EU. Applicants and subscribers residing beyond the EU can therefore benefit from a higher Privacy standard than that offered in their own country of residence.

### Submission and collection of Personal Data

25. **Pseudonyms:** Following appropriate procedure, GlobalSign issues pseudonym certificates upon request. Personal data revealing the identity of the pseudonym holder may be released to authorized parties as required by law.
26. **Additional personal information:** At the subscriber's request GlobalSign may include additional personal information on a certificate.
27. **Scope of collection of personal data:** GlobalSign requests only personal data that is absolutely necessary to establish the identity of an individual with the purpose to issue a digital certificate.
28. **Usage of collected data:** GlobalSign pledges to decline using the submitted personal data for purposes other than establishing the identity of the applicant to offer the PKI product or service requested.

29. **Beneficiary**: The personal data that is requested from an applicant or subscriber of a GlobalSign product or service is essential to conclude an agreement of which applicants or subscribers are the immediate beneficiaries.
30. **Instance of collection of personal data**: GlobalSign uses appropriate forms to collect personal data in the following instances: when an applicant makes a request for an offer and when an applicant following the dispatch of the appropriate URL sends a request to receive a certificate.
31. **Consent upon submission**: Upon submitting personal data through a meticulous process and following appropriate representations from GlobalSign, the applicant or subscriber of GlobalSign products or services is asked to give her consent regarding the submission and the subsequent processing of data.
32. **Commercial announcements**: GlobalSign may use contact information provided by an applicant or subscriber to circulate information regarding products, upgrades etc.
33. **Administrative and security announcements**: GlobalSign reserves its right to use subscriber provided contact information to notify subscribers on administrative or security matters regarding GlobalSign products or services.
34. **Forms of publishing**: GlobalSign uses paper-based and electronic communication material to appropriately explain the technology and the legal implications for the providers and the users of its products and services.
35. **Multi-lingual presentation**: Although the culture of the www-related services encourages the provision of information in English, through its extensive network of national alliance partnerships GlobalSign supports local languages for information and legal notice in the countries that it directly operates for issues including the protection of personal data.

### Processing

36. **Scope of processing**: Processing of personal data does not exceed the scope of the product or service offered, being the establishing of the identity of the applying or subscribing individual.
37. **Personal data processing systems**: To process personal data GlobalSign uses both computer-based and manual-based filing systems and may choose to contract with third parties to utilize expertise concerning the long term archival of any GlobalSign data. In this case the principles highlighted in this policy will be upheld by the third party.
38. **Processing and transmission equipment**: GlobalSign uses sophisticated equipment and applies appropriate procedures for the transmission and storage of personal data.
39. **Auditing of procedures**: GlobalSign implements appropriate procedures for the transmission and storage of personal data that are subject to auditing by a third party auditor or internally by self-statement.
40. **Reference for procedures**: The technical and organizational measures implemented regarding personal data can be found and explained in this policy statement and in the GlobalSign CPS.
41. **Plain language**: Although the provision of GlobalSign's public certification services is a highly technical subject in the non-legally binding documentation GlobalSign uses clear

and plain language to adequately explain its legal position and policy regarding the provision of public certification services, including the protection of personal data. GlobalSign also publishes explanatory statements, policy statements and promotional information on its www site.

42. **Statistical and other processing of personal data**: GlobalSign reserves its right to perform statistical, historical or scientific processing of the personal data it collects.
43. **Application assessment**: GlobalSign examines applications for certificates and assesses them exclusively using criteria like data submitted and appropriate payments of the fees due. GlobalSign reserves the right to refuse to issue a certificate following appropriate examination and assessment of an application. Following the rejection of an application, an applicant may repeat the application process.
44. **No content approval**: As a provider of PKI products and services, GlobalSign is disassociated from the content and form of messages and www sites that use GlobalSign products or services. A GlobalSign certificate is not a sign of approval of the content of a message or a www site that uses it. Subscribers of GlobalSign certificates will hold GlobalSign clear of any liability for damages, including consequential damages, as a result of treating personal data that is not included in a GlobalSign product or service and for which GlobalSign has not performed appropriate controls and/or treatment.
45. **Subscriber provided information**: Consistent with European and Belgian Laws regarding the provision of Trust services and the protection of personal data GlobalSign requests users to personally submit personal data. After performing appropriate computer-based and manual controls to ensure the accuracy of the submitted data, GlobalSign cannot accept any further responsibility for damages suffered because of inaccurate subscriber provided data except within the limits of the GlobalSign Limited Warranty Plan
46. **Accessing personal data**: Applicants and subscribers of GlobalSign products and services are free to contact GlobalSign and request to access data GlobalSign holds that they have submitted. Requests to access personal data are done through digitally signed e-mail or registered mail. GlobalSign's replies are sent within five (5) business days from receipt of the request.
47. **Accessing personal data**: Applicants or subscribers whose data is kept by GlobalSign are allowed to contact GlobalSign in order to access and review data concerning them.
48. **Rectifying personal data**: In case of incomplete or incorrect data held on a GlobalSign record, GlobalSign pledges to complete or rectify personal data from its records as appropriate, free of charge following a request from an applicant or subscriber.

### **GlobalSign Limited Warranty Plan.**

49. **Retention of personal data**: Personal data submitted to GlobalSign can be retained for up to thirty (30) years depending on the class of product or service and may be retained in either a physical or electronic format.
50. **General information available**: GlobalSign makes general information available on the www site with a view to provide background information including its line of products and services, public Key Infrastructure, information security and the protection of personal data.

**51. Contacting GlobalSign:** For all your inquiries regarding your personal data you may contact GlobalSign by mail using the contact information published on <http://www.globalsign.com> or by e-mail: [legal@globalsign.com](mailto:legal@globalsign.com)

## **7.0 Other statutory rights**

This statement does not affect any statutory or other rights private parties may have as data subjects or otherwise due to national law.