

PRIVACY POLICY

SECTION 1 – CONTACTS

Topics related to personal data collection and processing are the responsibility of the Person in Charge for Personal Data Processing. Any communication on this topic can be addressed to the following contacts:

Address:	MULTICERT – Serviços de Certificação Electrónica, S.A. Lagoas Park, Edifício 3, Piso 3 2740-266 Porto Salvo Oeiras - Portugal
Telephone Contacts:	+351 217 123 010
Opening Hours:	From Monday to Fridays, from 9h to 18h
Email:	privacy@multicert.com

SECTION 2 – CONCEPTS AND DEFINITIONS

For purposes of clarifying and agreement on the understanding and interpreting of this policy content, the following concepts are defined:

- 2.1. **Private Data** – Private data are all data which directly or indirectly identify an individual, for example, name and surname, address, PO Box, phone number, identification document number, among others.
- 2.2. **Special Categories of Private Data or Sensitive Data** – Special Categories of Private Data, or sensitive data, are all data which disclose the racial or ethnic background, political opinions, religious or philosophical convictions, union membership, genetic data, biometric data which unambiguously identify a person, data related to health or sexual life or sexual orientation of the data owner.

SECTION 3 – PRINCIPLES OF DATA PRIVACY

Collection and processing of personal data by Multicert is managed according to the following principles:

- 3.1. **Legality, Loyalty and Transparency Principle** - Personal data are obtained and processed only in a lawful and transparent manner.
- 3.2. **Purposes Limitation Principle** - The personal data owner will always be informed of the data processing purposes prior to their collection and processing. Personal Data are only processed with the purpose for which they were collected, and this purpose is based on legal terms. The legal terms can arise from legislation,

contracts or by means of the explicit consent by the private data owner according to the services provided by Multicert.

- 3.3. **Principle of Accuracy** - Personal data are updated whenever it is relevant to ensure their accuracy and the accuracy of services provided by Multicert. Data update can be requested by the data owner or decided by Multicert. If decided by Multicert, the company undertakes to notify the data owner regarding their accuracy, except if such notification is impossible or implies a disproportional effort.
- 3.4. **Principle of Storage Limitation** - Personal data are only stored for the period needed for the purposes for which they were obtained and during the period needed to fulfil legal obligations, namely fulfilment of Regulation no. 910/2014.
- 3.5. **Principle of guarantee of Confidentiality and Integrity** - Multicert implemented organizational measures and techniques to ensure the confidentiality and integrity of the personal data it holds.
- 3.6. **Sensitive Data** - Under exceptional circumstances sensitive data can be supplied to Multicert. In this case, Multicert will proceed according to the information sensitivity and complying with the applicable legislation which implies obtaining the explicit consent for the collection and processing of such information whenever the data owner has not made those data public.
- 3.7. **Data Transmission to Third Parties** - Multicert will transmit your personal data to other entities whenever this transmission is mandatory for supplying the product/service requested by the data owner. Information will only be transmitted to other entities within the scope of European law or other entities located in countries which ensure the same personal data security level of the European Union.

SECTION 4 – PERSONAL DATA OWNER RIGHTS

The personal data owner is entitled to the protection and update of his/her data by Multicert whenever this entity has collected/processed those same data according to the European legislation in force.

The personal data owner has:

- 4.1. **Access Right** - the personal data owner is entitled to obtain, from the person in charge of processing, the confirmation that his/her personal data are, or not, the object of processing and if that is the case, the right to access and obtain a copy of his/her personal data.

- 4.2. **Rectification Right** - the personal data owner is entitled to obtain, without undue delay and from the person in charge of processing, the rectification of his/her incorrect personal data.

Additionally, the owner is also responsible for notifying Multicert in cases of change of personal data present within the scope of the issuance service of digital certificates.

- 4.3. **Right to Oblivion** - the personal data owner is entitled to obtain from the person in charge of processing, the elimination of his/her personal data without undue delay and the latter is obliged to erase all personal data without undue delay.

- 4.3.1. The right to oblivion is applicable when **(i)** data are no longer needed for the purpose which led to its collection; **(ii)** the owner has withdrawn his/her explicit consent; **(iii)** the owner has exercised his/her right to oppose; **(iv)** the data have been obtained illegally; **(v)** the data have been erased by legal constraint.

- 4.3.2. The right to oblivion is not applicable when the personal data processing is regarded as needed to comply with a legal obligation.

Multicert reserves the right to keep the personal data related to digital certificates' issuance under the scope of Regulation no. 910/2014.

- 4.4. **Right to Processing Limitation** - the personal data owner is entitled to obtain from the person in charge of processing, the limitation of processing when: **(i)** the owner has contested the data accuracy; **(ii)** the processing is illegal; **(iii)** data are no longer needed for the purposes for which they were obtained; **(iv)** the owner has exercised his/her right to oppose.

- 4.4.1. Whenever processing has been limited by means of one of the cases foreseen in **4.4**, and with the exception of conservation, personal data can only be the object of processing with the owner's consent or for purposes of statement, exercise or defence of a right in a legal proceeding.

- 4.4.2. The owner who obtained processing limitation pursuant to **4.4** is informed by the person in charge of processing before the limitation to the mentioned processing is annulled.

- 4.5. **Right to portability** - the data owner is entitled to receive his/her personal data which he/she previously supplied to the person in charge of processing in a structured format commonly used and of automatic reading and the right to transmit or request the person in charge of processing to transmit those data to the person in charge of processing from another entity whenever such is automatically possible and whenever: **(i)** legality for data collection and processing has been

obtained by means of explicit consent or contract; **(ii)** processing is carried out by automatic means.

- 4.6. Right to oppose** - the data owner is entitled to oppose his/her personal data processing at any moment for reasons related to his/her private situation when processing: **(i)** is carried out for purposes of exercising duties of public interest or public authority; **(ii)** is carried out for the legitimate interests purposes by the person in charge of processing or by third parties; **(iii)** is carried out for purposes which are not the ones for which they were collected, and upon which no explicit consent has been obtained from the data owner or when there are no legal grounds that justify it; **(iv)** is carried out for direct trade purposes. In this case, only the data processing for purposes of direct trade is stopped.

In these cases, the person in charge for processing stops processing the data unless he/she provides compelling and legitimate reasons for the data processing to be maintained over the interests, rights and liberties of the data owner or for legal reasons:

- 4.6.1.** The data owner is entitled to not remain subject to a decision taken exclusively based on automatic processing, including profile setting which takes effect on his/her legal sphere or that similarly substantially affects him/her. This situation does not apply if the decision: **(i)** is needed to conclude or execute a contract between the data owner and the person in charge of data processing; **(ii)** is authorized by European and National law; **(iii)** is based on the explicit consent of the data owner.

SECTION 5 – MULTICERT DUTIES

Multicert protects the owners' rights and updates the data collected/processed by the company according to the European legislation in force. Multicert has a:

- 5.1. Duty to Inform** -

Multicert has the duty to inform the data owner, prior to the collection/processing of the said data with the information related to the purposes of the processing, potential information transfer that might take place, data conservation terms, right to lodge a claim with the Control Authority, among other informative elements.

- 5.2. Duty to Notify** - Multicert communicates to each recipient to whom personal data have been transmitted any rectification or deletion of personal data or processing limitation which it has carried out complying with the rights of rectification, oblivion or limitation of processing except if such communication is impossible or implies a

disproportional effort. If the data owner requests it, the person in charge of processing will supply him/her with the information on the mentioned recipients.

5.3. Duty of Personal Data Portability and Transfer - If requested by the personal data owner, Multicert has the duty to transmit to the former his/her personal data in a structured format file commonly used and of automatic reading. If requested by the data owner and technically possible, the person in charge of processing transfers the file with the personal data to a third entity designated by the data owner.

5.4. Duty of Purpose Limitation -

Multicert only collects the adequate, relevant and strictly necessary personal data to execute the purposes for which they are processed.