

PRIVACY POLICY AND PROCESSING OF PERSONAL DATA¹

1. DigitalSign's Commitment

Privacy and personal data protection are a DigitalSign's fundamental commitment towards its customers and services users.

DigitalSign Certificadora Digital, S.A, hereinafter referred to as DigitalSign, is a Qualified Trust Service Provider (QTSP), considered as such within the European Union, under the Regulation (EU) No 910/2014 of the European Parliament and of the Council of 23 July (Regulation eIDAS), included in the trusted list², and therefore accredited by the National Security Office, in Portugal, for providing various trust services and, namely, for issuing Qualified Digital Certificates, in strict compliance with the applicable legal standards, especially the Portuguese Decree-Law No 290-D of 2 August 1999, defining the legal system of electronic documents and of digital signatures, and the corresponding Implementing Decree No 25/2004, of 15 July, complying with strict parameters of confidentiality and information security, provided for in ISO 27001, which has been the guiding reference for the activity in this market.

DigitalSign recommends the reading of this document and particularly the clauses of the General Conditions relating to DigitalSign's Personal Data, available on its website, as well as on the Digital Certificate Issuance Contract, as they advocate DigitalSign's commitment on protecting customers' data under the General Data Protection Regulation, which came into force on 25 May 2018.

2. Definitions

The following definitions are used for the purpose of facilitating the understanding of this policy:

1. **"Personal Data"** - means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
2. **"Personal Data Processing"** - operation or set of operations performed on personal data or sets of personal data, executed by automated or non-automated means, such as:
 - a) Data collection, recording, organization, structuring, storage, adaptation or alteration, recovering, consulting, use;
 - b) disclosure by transmission, dissemination or any other form of making it available, or comparison or combination, restriction, deleting or destruction.

¹ The reading of this policy does not relieve the reading of the clauses of the General Conditions relating to Personal Data and the provisions of the 9th clause of the General Conditions on the Digital Certificate Issuance Contract

² Available at: <https://www.gns.gov.pt/trusted-lists.aspx>

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3. **"Third Party"** - natural or legal person, public authority, agency or organization other than the subject of the data, data controller, data processor or someone directly authorized by the data controller or processor for processing personal data.
 4. **"Personal Data Controller"** - natural or legal person, public authority, agency or other organization who, independently or jointly with others, determines the purposes and ways for the processing of Personal Data.
 5. **"Personal Data Processor"** - natural or legal person, public authority, agency or any other organization responsible for processing personal data on behalf of the Controller;
 6. **"Supervisory Authority"** - independent public authority, namely the National Commission for Data Protection (CNPD) in Portugal, responsible for monitoring the correct application of legislation on personal data protection.
 7. **"Cookies"** - computer files containing a sequence of numbers and letters which allow a unique identification of the Users' Internet access device, that may also contain other information such as browsing preferences on a Website. Cookies are downloaded through the browser to the Internet access device (computer, phone, tablet, etc.) when accessing certain websites.

3. Data Controller and Data Protection Officer

DigitalSign will be responsible for collecting and processing your personal data, as the service provider, deciding under this scope, which collected data to be used, means for processing and usage purposes.

DigitalSign has also a Data Protection Officer (DPO), who (i) monitors the compliance of data processing with the applicable laws, (ii) who is the contact person for clarifying customers or users on issues related to DigitalSign's data processing, (iii) and cooperates with the Supervisory Authority, (SA) providing information and advising the controller or the processor on their obligations regarding privacy and data protection.

4. Personal Data, Personal Data Subjects and Categories of Personal Data

What is Personal Data?

Personal Data is any information of any kind and form, relating to an identified or identifiable individual.

An identifiable individual is someone who can be identified directly or indirectly, for example, by a name, ID number, a given location, an electronic identifier or any other details which allow the identification of an individual.

Who are the Personal Data Subjects?

Customer or user, natural person, whom data relates to and who acquired DigitalSign products and services. The Customer is the one who signs the contract with DigitalSign, and the user is the person who uses DigitalSign' goods and services, which may not correspond to the customer. In this regard, DigitalSign commits to protect personal data and to respect the rights of their customers and users.

What categories of personal data do we process?

Identification Data	Examples
Identification and contacts	Full name, address, civil or tax ID numbers, payment and billing data, email address and telephone number;
Other identification data	Quality of Legal Representative and / or a member of a particular company / entity
Service	Goods and services purchased or subscribed

5. Principles, Purposes and Processing Duration of Personal Data

On what grounds can DigitalSign process your personal data?

Consent: Once the explicit consent is given - in writing, orally or by ticking an option - and if that consent is given in advance, freely, informedly and explicitly. In the case of processing minors' personal data, which may be subject to prior consent, DigitalSign requires that consent to be given by the holders of parental responsibilities, particularly for the purpose of providing remote services, by electronic means;

Contract Processing and pre-contractual proceedings: processing of personal data necessary for the execution, implementation and management of the contract with DigitalSign, namely, for the purpose of issuing digital certificates for contact, information and order management, and for invoice, collection and payment management;

Legal obligation: when the processing of personal data is necessary for the compliance with a legal obligation to which DigitalSign is subject, such as data communications required by any judicial or administrative authority, to comply with the law;

Legitimate interest: when the processing of personal data corresponds to a DigitalSign's or third parties' legitimate interest, such as the processing of data for fraud detection, revenue protection and service quality improvement.

What are the principles observed by DigitalSign in the processing of personal data?

When processing Personal Data of its customers, DigitalSign observes the principles of lawfulness, loyalty, transparency, purpose limitation, data minimization, accuracy, limitation of conservation, integrity, confidentiality and accountability.

As provided in the 9th clause of the general conditions on the Digital Certificate Issuance Contract, DigitalSign undertakes to ensure the privacy and confidentiality of all its customers' personal data, whose knowledge is not intended for public disclosure.

For which purposes and for how long does DigitalSign process your personal data?

Your personal data are processed by DigitalSign only for the necessary period to carry out the defined purpose or, while applicable, until it is exercised the right to object, the right to be forgotten or the withdrawal of consent.

After the respective retaining period, DigitalSign will delete or make the data anonymous, whenever it should not be retained for a different purpose that may exist and, in this sense, except with regard to the fulfilment of the duty to preserve the data which served as basis for the provision of its services, during a minimum legal period of 20 years, as stipulated in Article 25 point i) of the Legal Regime for Electronic Documents and Digital Signature, corresponding to the updated version of the Decree-Law no. 290-D / 99, of 2 August, and to the provisions of article 16, no. 4 of the respective Regulatory Decree no. 25/2004, of 15 July, being all rights mentioned above fully guaranteed by DigitalSign.

Purposes	Examples of purposes (non-exhaustive)
Marketing and Sales	Marketing or sale of new products or services
Customer Management and Service Provision	Contact, information or order management Installation management, activation, revocation or renewal of services Invoice, collection and payment management Call recording (And videoconferencing), and communications within the contractual relationship, if applicable
Accounting, Tax and Administrative Management	Accounting, Invoicing Tax information, including sending information to the tax authority
Compliance with legal obligations	Conservation of Digital Certificates issued, for the legal period of 20 years, in accordance with Article 25, point i) of the Legal Regime for Electronic Documents and Digital Signature corresponding to the updated version of the Decree-Law no. 290-D / 99, of 2 August, and Article 16, no. 4 of the respective Regulatory Decree no. 25/2004, of 15 July

What are the deadlines for the processing and retaining of personal data?

DigitalSign processes and retains your personal data according to the purposes for which they were collected for.

Nevertheless, since DigitalSign is a Certification Authority accredited to issue Digital Certificates, the retention of data which served as basis for the provision of their services is legally required for a legal minimum period of 20 (twenty) years, under the Article 25, paragraph i) of the Legal Regime for Electronic Documents and Digital Signature, corresponding to the updated version of the Decree Law no. 290-D / 99 of 2 August, and Article 16, no. 4 of the respective Regulatory Decree no. 25/2004 of 15 July.

Thus, whenever there is no specific legal obligation, data will be processed only for the period necessary to fulfil the purposes for which it was collected and retained, always in accordance with the law, guidelines and CNPD decisions or any other competent control authority under the applicable law. Personal data collected by DigitalSign will thus be processed and retained for contract execution until it has terminated. After this period, data will be retained for the legal period of 20 years, under the Article 25, paragraph i) of the Legal Regime for Electronic Documents and Digital Signature, corresponding to the updated version of the Decree Law no. 290-D / 99 of 2 August, and Article 16, no. 4 of the respective Regulatory Decree no. 25/2004, of 15 July. However, the processing and retaining of Customers' personal data can only occur with their express consent, for the purpose of protecting rights and duties related to the contract, or when legitimate interests warrant.

6. Form and time of collection of personal data

When and how do we collect your personal data?

We collect your personal data at the subscription of a DigitalSign service, in a pre-contractual stage, and for the purpose of contract execution. In fact, the personal data we require is the one indispensable for the provision of its services (including issuing, billing and/or renewal of digital certificates and access to other provided services). The collection can be made through user registration and by filling in the respective form on DigitalSign's website, or through a videoconference specifically directed to that purpose, if applicable and if desired by the Customer.

DigitalSign may also access, collect or confirm personal data on Public Administration and private entities' websites, namely, to confirm the accuracy and up-to-datedness of its identification and contact details.

7. Rights of the Personal Data Subject

What are your rights?

Right of access: right to obtain confirmation of what personal data are being collected and processed by DigitalSign, to receive information about them, such as, the purposes of the processing, retention periods, among others, as well as the right to see / hear or obtain a copy of, for example, invoices, written agreements or calls/video conferences in which the subject intervened.

Right to Rectification: right to request the rectification of inaccurate personal data or request incomplete personal data to be completed, such as address, VAT number, email, telephone, contacts, among others

Right to Data Erasure or "Right to be forgotten": right to obtain the erasure of personal data, unless there are valid grounds for its retention, such as when DigitalSign is forced to keep the data in order to comply with legal obligations (namely, the legal obligation to keep the data of all Digital Certificates issued for a minimum legal period of 20 years³),

³ In accordance with the provisions of Article no 25, item i) of the Legal Regime for Electronic Documents and Digital Signature, corresponding to the updated version of the Decree-Law no. 290-D / 99, of 2 August, and of the provisions of Article 16, no 4 of the respective Regulatory Decree no 25/2004, of July 15t

as well as in order to comply with the legal obligation of preserving data for investigation, detection and prosecution of crimes, or for ongoing judicial processes.

Right to data portability: the right to obtain the provided data in digital format, in current use and of automatic reading or to request its direct transmission to another entity, who becomes the new responsible for the processing of your personal data, such as receiving invoices or forward your contacts to the new responsible, but in this case, only if it's technically possible.

Right to withdraw consent or Right to Object: right to object or withdraw your consent to processing of data, at any time, such as for marketing purposes, provided that no legitimate interests, rights and freedoms prevail over theirs, such as in defence of a right in a court case.

Right to restriction: right to request the restriction of the processing of their personal data in case of: (i) withdrawal of processing of data (ii) limitation of the processing's scope to certain types of data or processing purposes.

User Registration and Restricted Area

By registering as users, Customers or potential Customers gain access to the various services DigitalSign provides and, in particular, to the ordering of services they wish to purchase, among other available features, such as the management of placed orders, in the Customers' reserved area ("View Account"). If the user is already registered on the website, it is as simple as doing the login by entering the email and the respective password, defined upon the initial registration.

This password guarantees the user access to service management in the respective reserved area and if, despite this, there is still no registration of the user on the website, it will be required the introduction of the user's TIN and afterwards, the definition of an email and password, in order to register.

Upon the initial registration, DigitalSign does also request, as mandatory data, the user's TIN, billing name, contact name, address, door number / floor, postal code, city, country and telephone, and as optional data, country and mobile phone. The data provided by the users will only be used to perform the services selected by the user, for which they were provided, not being added to another list, nor made available to other entities or even used to send unrelated information.

Use of Cookies

DigitalSign uses cookies on its website to improve performance and browsing experience for the subjects of the personal data, increasing, on one hand, the responsiveness speed and efficiency and, on the other hand, eliminating the need of having to enter the same information repeatedly.

For more information, see our Cookie Policy, available for consultation on our Website.

Profile and automated decisions

DigitalSign might trace customers' profiles based on, for example, the use of the service, location, and other elements, in order to provide other services, increase quality, product and service experience, adjust marketing communications,

and others. provided that the processing is necessary for the conclusion or enforcement of the contract between the holder and DigitalSign, or if it is based on the holder's consent.

Right to claim

Right to submit complaint to the National Commission for Data Protection (CNPD), or other competent control authority under the law, aside from the company or the CNPD, when it is believed that the applicable legal regime on the processing of data was violated by DigitalSign.

How can you exercise your rights?

The exercise of your rights is free of charge, unless it is a manifestly unfounded or excessive request, in which case a reasonable fee may be charged, considering the related costs.

However, bear in mind the fact that the exercise of the respective rights to data erasure, withdrawal of consent or restriction of rights can only be exercised as long as they do not prevent DigitalSign from complying with any legal obligation.

Information should be provided in writing, but, if desired, it can be given orally. In this case, DigitalSign must verify your identity by other means than the oral.

The response to requests must be provided within 30 days, unless it is a particularly complex request.

Exercise your rights by sending your claim to the following addresses:

Letter: Largo Padre Bernardino Ribeiro Fernandes, no 26, 4835-489 Nespereira, Guimarães

Email: dpo@digitalsign.pt

8. Personal Data Transmission

Under what circumstances is your personal data communicated to other entities, subcontractors or third parties?

Your personal data may be transmitted to subcontractors for processing, on behalf or at the expense of DigitalSign. In this case, DigitalSign will take the necessary contractual measures to ensure the subcontractors respect and protect the subject's personal data.

Data may also be transmitted to third parties other than DigitalSign or subcontractors, namely DigitalSign partners, in case the subject has given its consent, or to entities to whom the data must be communicated, according to the law.

Under what circumstances does DigitalSign transfer your data to a third country?

DigitalSign may have to transfer your personal data to a third country outside the European Union, not included in the list of countries considered by the EU to meet the appropriate levels of personal data protection. In such cases, DigitalSign ensures that data transfers are carried out in strict compliance with applicable legal standards.

9. Responsibility over Websites

Regarding the use and processing of personal data from DigitalSign websites, consult the policy on privacy, data protection and use of cookies on the respective websites.

DigitalSign Websites may contain links to other third-party websites, products or services with which there is no relationship, or which are not covered by this Privacy Policy.

The collection or processing of personal data requested by these third parties is your sole responsibility and DigitalSign cannot be held responsible, under any circumstances, for the content, accuracy, veracity or legitimacy of these Websites or for the misuse of the data collected or processed by through them

We alert DigitalSign's customers and users to this fact and to the need of, before accessing those Websites, products or applications, reading and accepting the rules regarding the processing of personal data defined by those third parties.

10. Procedural and technical security measures

How does DigitalSign protect your personal information?

DigitalSign implemented the appropriate logical, physical, organizational and security measures necessary and sufficient to protect your personal data against destruction, loss, alteration, dissemination, unauthorized access or any other form of accidental or illicit processing. In that sense, DigitalSign implemented:

- a) Logical security requirements and measures, such as the use of firewalls and intrusion detection systems in its systems, based on the existence of a strict policy on the access to systems and information and, the recording of DigitalSign employees' actions on customers or users' personal data;
- b) Physical security measures, especially the control of the strict access to DigitalSign's physical facilities, by employees, partners and visitors, as well as very restricted and permanently monitored access to DigitalSign's essential technological infrastructures;
- c) Data protection means from conception ("privacy by design") through technological means such as mask, encryption, pseudonymisation and anonymisation of personal data, and a set of preventive measures favourable to privacy by default");
- d) Scrutiny, audit and control mechanisms to ensure compliance with security and privacy policies;
- e) IT and training program for DigitalSign employees and partners; and
- f) Access rules for customers or users to certain products or services, such as the introduction of a password, to strengthen control and security mechanisms.

Changes to the Privacy Policy and Protection of Personal Data and Cookies

DigitalSign may update or make readjustments to this Policy, as well as to its Cookie Policy, and to the general conditions relating to Personal Data, being these changes duly publicized.

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