

## **GlobalSign Privacy Policy Version 3.0**

**Updated April 1, 2018**

GlobalSign respects your right to privacy. This privacy policy has been developed to inform you about the privacy practices followed by GlobalSign in connection with its websites, products and services. This privacy policy does not apply to GlobalSign services offered by or through our partners, resellers or other third parties, or other third party services or websites, and we encourage you to read the privacy policies of those parties.

This privacy policy will inform you about what data is collected, how we use such data, where data is processed, how you may opt out of your data being used, the security provisions around storing your data and how to correct or update your data.

### **1. Data Controller**

In order to communicate with you and to provide our products and services and related support, it is necessary for GlobalSign to transfer your personal data outside of the European Union. In such case, the data controller for this data for EU residents is GMO GlobalSign, Ltd., having its registered offices at Springfield House, Sandling Road, Maidstone, Kent, ME14 2LP, United Kingdom. All questions or requests regarding the processing of data may be addressed to: [dpo@globalsign.com](mailto:dpo@globalsign.com).

### **2. Collection of Personal Information**

We collect information from you when you (i) place an order for a GlobalSign digital certificate product or other product or service, (ii) scan your servers for digital certificates using our Certificate Inventory Tool (CIT), (iii) apply for access to our managed service platforms, (iv) subscribe to our newsletter, (v) use our online chat service, (vi) download a white paper, (vii) register for a webinar, (viii) respond to a survey, (ix) fill out a form for pre/post sales assistance, (x) open a support ticket, or (xi) your use of social media.

GlobalSign is a Certification Authority and trusted third party. To fulfill requests for digital certificates or other products or services, you may be asked to enter your name, email address, physical address, phone number, credit card information and/or organizational details or other personal information.

We may develop and acquire additional information about you using third-party sources, browsing, and purchasing history, and so on in order to process certificate requests and to improve our services.

GlobalSign treats personal information as confidential, except for the information included in an issued digital certificate. Such information may be verified using third party commercial and government resources, and as such, is deemed to be public information.

### **3. Use of Personal Information**

Your information, whether public or private, will not be sold, exchanged, transferred outside of our group company, or given to any other company for any reason without your consent, other than for the purposes specified in below:

#### **3.1 To process applications for GlobalSign products and services**

Your information is used to provide our products and services and order processing as well as to conduct business transactions such as billing.

### **3.2 To improve customer service**

Your information helps us to more effectively respond to your pre/post sales requests and provide technical support.

### **3.3 To send renewal notices**

The email address you provide for order processing may be used to send you renewal notices for your expiring digital certificate.

### **3.4 To send periodic emails**

In addition, we may send you periodic company newsletters, new service updates, security updates, related product or service information, and status updates on maintenance windows or service availability.

### **3.5 To tell you about our products and services**

We may send you information about our products and services that may be of interest to you based on your use of other GlobalSign products and services, your attendance at GlobalSign sponsored marketing events such as webinars, your requests for information about similar products and services, or your sharing of data with social media sites such as LinkedIn or Facebook.

## **4. Processing of Data and Consent**

We will process your data for the purpose of performance of our contract with you or the legitimate interest of our business. In other cases, we will request your consent for the processing of the personal data you may submit.

Your refusal to provide personal data to us for certain products and services may hinder us from fulfilling your order for those products or services. Also, if you deny or withdraw your consent to use personal data or opt out of receiving information about GlobalSign products and services this may result in you not being made aware of sales promotions, renewal notices, periodic company newsletters, new service updates, security updates, related product or service information, and status updates on maintenance windows or service availability.

## **5. Use of Cookies and web beacons**

The GlobalSign Certificate Center (GCC) uses cookies to enable the fulfillment of services. Cookies may be used when you log into the GCC, purchase products or use certain GCC functions.

In addition, like most online businesses, GlobalSign uses cookies and web beacons on our websites and through marketing related emails to gather and analyze some personal data such as the visitor's IP address, browser type, ISP, referring page, operating system, date/time and basic geographical information.

We use cookies and web beacons to compile aggregate data about site traffic and site interaction so that we can gauge the effectiveness of our communications and offer better site experiences and tools in the future. We may contract with third-party service providers to assist us in better understanding our site visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business.

First time visitors may choose to not have any activity monitoring cookies set in their browser. We use an opt-out identification cookie to tag these users as having made this decision. Those

cookies that pertain to site performance, experience improvement and marketing are programmed not to execute when an opt-out cookie is present in a visitor's browser. Opt-out cookies persist until a visitor clears their browser cookies, or until their expiration one year after the set date. A visitor is required to opt out again after one year in order to disable any activity monitoring cookies.

More details of GlobalSign's use of cookies can be found on our website at <https://www.globalsign.com/en/repository/cookie-policy/>

## **6. Use of application logs for diagnostics or to gather statistical information**

Our servers automatically record information ("Application Log Data") created by your use of our services. Application Log Data may include information such as your IP address, browser type, operating system, the referring web page, pages visited, location, your mobile carrier, device and application IDs, search terms, and cookie information. We use this information to diagnose and improve our services. Except as stated in section 8 (Data Retention), we will either delete the Application Log Data or remove any account identifiers, such as your username, full IP address, or email address, after 12 months.

## **7. Sharing of Information and Transfers of Data**

We do not sell or trade your personal information to outside parties.

GlobalSign is a global organization with business processes and technical systems in various countries. As such, we may share information about you within our group company and transfer it to countries in the world where we do business in connection with the uses identified in section 3 above and in accordance with this Privacy Policy. In these cases, personal data will be transferred to countries that do not provide an adequate level of protection under European law so we ensure your data is protected by entering into agreements containing standard contract clauses with each of our group companies a copy of which may be obtained by contacting us as outlined in section 15 below.

We may also transfer your personal data to trusted third parties in order to serve purposes that are specified in section 3 above. In circumstances where data is shared with such third parties, they are required to agree to confidentiality terms. This prohibits such third parties from selling, trading, using, marketing or otherwise distributing GlobalSign customer data.

We may also release your information when we believe release is appropriate to comply with the law or protect our rights, property, or safety.

It is our policy to notify customers of requests for their data from law enforcement unless we are prohibited from doing so by statute or court order. Law enforcement officials who believe that notification would jeopardize an investigation should obtain an appropriate court order or other process that specifically precludes member notification, such as an order issued pursuant to 18 U.S.C. §2705(b).

We may also disclose your personal information to third parties who may take over the operation of our site or who may purchase any or all of our assets, including your personal information. We will contact you using the details you provide if there is any change in the person controlling your information.

## **8. Data retention**

The personal information we collect is retained for no longer than necessary to fulfil the stated purposes in section 2 above or for a period specifically required by law or regulation that GlobalSign is obligated to follow.

To meet public CA audit requirements as detailed in the GlobalSign Certification Practice Statement, personal data used to fulfill verification of certain types of digital certificate applications will be retained for a minimum of 10 years depending on the class of product or service and may be retained in either a physical or electronic format. Please refer to the GlobalSign Certification Practice Statement for full details.

Even if you request deletion or erasure of your data, we may retain your personal data to the extent necessary and for so long as necessary for our legitimate business interests or performance of contractual obligations.

After the retention period is over, GlobalSign securely disposes or anonymizes your personal information in order to prevent loss, theft, misuse, or unauthorized access.

## **9. Opting out; withdrawing consent**

If at any time you would like to unsubscribe from receiving future emails, we include unsubscribe instructions at the bottom of each email.

Renewal notices may be cancelled on a per digital certificate basis by logging into your GlobalSign Certificate Center (GCC) account and disabling renewal notices.

Email preferences for CIT related/collected information can be updated and changed within CIT.

If GlobalSign is processing your personal data based on your consent, you may withdraw your consent at any time by contacting us at one of the addresses shown in section 15 below.

## **10. Access to your personal data**

You are responsible for providing Globalsign with true, accurate, current and complete personal information. Also you are responsible to maintain and promptly update the information to keep it true, accurate, current and complete.

You have the right to access and modify your personal data stored on GlobalSign systems. You can request to access or modify your personal information by contacting us in writing. We will require you to provide identification in order to verify the authenticity as the data subject. We will make reasonable effort to respond to and process your request in a timely manner.

If you provide any information that is untrue, inaccurate, not current or incomplete, or if we have reasonable grounds to suspect that such information is untrue, inaccurate, not current or incomplete, we have the right to suspend or terminate your account and refuse any and all current or future services.

## **11. How we protect your information**

We implement a variety of security measures to maintain the safety of your personal information when you place an order or enter, submit, or access your personal information. All supplied sensitive/credit information is transmitted via Secure Socket Layer (SSL).

After a transaction, your transaction-related information will be kept on file to meet audit requirements and facilitate renewals. We do not retain any credit card details.

GlobalSign uses a reputable third party to process credit card payments and needs to provide credit card numbers and identifying financial data directly to the third party credit card processor. Such information is shared securely.

## **12. Follow relevant laws**

GlobalSign commits itself to protect the personal information submitted by applicants and subscribers for its public certification services. GlobalSign declares to fully respect all rights established and laid out in European laws 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; and
- Provisions of the GlobalSign CPS.

## **13. Your rights**

In compliance with the European Union rules on privacy, you have the following rights established by law:

- We use the data you submit only for purposes identified in section 3 of this privacy policy.
- You have the right to review your personal data that GlobalSign holds and check it for accuracy.
- You have the right to correct data in the case that errors may be found in our records.
- You have the right to request that any of your personal data be erased. i.e. right to be forgotten.
- You have the right to obtain and reuse use your personal data for your own purposes
- You have the right to request that GlobalSign restrict the processing of your personal data under certain circumstances.
- You have the right to object to our processing of your personal data.

## **14. Changes to our Privacy Policy**

If we make material changes to our privacy policy, we will inform customers by emailing a notice of the availability of a new version with a link to the new version.

## **15. Contact Us**

If you have any inquires, or questions regarding our privacy policy, please contact us at:

<https://support.globalsign.com/>  
<https://www.globalsign.com/en/company/contact/support/>  
<https://jp.globalsign.com/support/>

or

Deputy Data Protection Officer  
GMO GlobalSign, Ltd.  
Springfield House Sandling Road  
Maidstone, Kent ME 14 2LP  
United Kingdom  
[dpo@globalsign.com](mailto:dpo@globalsign.com)

## **16. Our Office Locations**

GM0 GlobalSign K.K., Tokyo, Japan  
GM0 GlobalSign Ltd., Maidstone, Kent, UK  
GM0 GlobalSign N/V, Leuven, Belgium  
GM0 GlobalSign, Inc., Portsmouth, NH, USA  
GM0 GlobalSign Russia LLC , Moskva, Russia  
GM0 GlobalSign Pte. Ltd, Anson, Singapore  
GM0 GlobalSign Certificate Services Pvt. Ltd., Delhi, India  
GlobalSign China Co., Ltd., Shanghai, China  
GM0 GlobalSign Inc., Manila, Philippines  
GM0 GlobalSign FZ-LLC, Dubai, UAE