

## PRIVACY AND DATA PROTECTION POLICY

Global Trusted Sign (GTS) respects the privacy and trust of its customers and partners, ensuring full protection of the privacy and security of personal data.

This policy applies to all personal data, where we consider personal data to be:

- “any information of whatever nature and on whatever medium, including sound and image, relating to an identified or identifiable natural person”;

- “(...) any information relating to an identified or identifiable natural person (“data subject”) being that “(...) 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.” (Article 4 of the GDPR).

In accordance with Article 2 of the GDPR, this policy applies “(...) to the processing of personal data wholly or partly by automated means and to the processing other than by automated means of personal data which form part of a filing system or are intended to form part of a filing system”.

The proper processing of the information is guaranteed in accordance with Portuguese and international laws, in particular the General Data Protection Regulation (Regulation 2016/679 of the European Parliament and of the Council). Therefore, the use of personal data is only permitted for activities for which the data subject has given his or her explicit consent to the processing.

Personal data provided within the scope of the qualified services provided by GTS and which are not publicly available through the content of issued certificates or certificate revocation lists (CRLs) are considered personal information of the data subject.

GTS does not share or transfer personal data to third parties without the express consent of the data subjects.

Only duly authorised employees belonging to GTS management teams may access personal data and undertake not to disclose or compromise it, in compliance with privacy legislation.

### Risks and Implications

Disclosure of personal information, as defined in this Policy, is punishable under Portuguese and European Law.

Violations of the provisions (RGPD) in force may result in fines under Article 83 of the RGPD.

## **Purpose of data processing**

The data collected is intended for:

- Registration on the platform, by filling in the corresponding forms;
- Execution of the contract of use, including the use of the platform, invoicing, satisfaction questionnaires, communications with Customers;
- Statistical analysis;
- Processing of requests for information/support and possible complaints;
- Marketing, through promotional newsletters, campaigns or new functionalities;
- Call back through the “Need help?” functionality.

## **When and how is data collected?**

GTS collects personal data from Clients through:

- Completion of registration forms for services provided by GTS on its portal;
- Completion of forms/matrixes, contact requests, support service, on the GTS portal;
- Submission of a complaint, by e-mail or by telephone;
- Communications by email, telephone or platform;
- The “Need help?” online service on the platforms.

Global Trusted Sign assumes that the data collected has been entered by the respective data subject, or provided by the data subject, and that its entry has been authorised by the data subject, and is true and accurate.

The data subject shall be informed whether or not the collection of personal data constitutes a legal or contractual obligation or a necessary requirement for the conclusion of a contract, and whether or not the data subject is obliged to provide the personal data and of the possible consequences of not doing so.

Furthermore, it should be made clear that only data strictly necessary for the provision of the concerned services will be collected and requested, in accordance with the explicit information on the platform and the options of the user.

Personal data of customers/owners may be collected and entered by GTS into automated databases for the execution of activities within the scope of the purposes for which they are collected and processed.

## **Storage time of personal data**

Personal data shall be stored only for the time necessary for the purposes for which it was collected or for further processing, ensuring compliance with all applicable legal provisions on archiving.

## Rights of data subjects

In accordance with current legislation, the data subject is guaranteed: the right to access, update, rectify or delete their personal data at any time, as well as the right to oppose the use of the data provided for marketing purposes. To do so, you must send a request through the contacts indicated on the GTS website. If you consider that your data is not being processed in accordance with the applicable legislation, you have the right to file a complaint with the National Commission for Data Protection (*Comissão Nacional de Protecção de Dados - CNPD*).

To exercise your rights, you can contact us:

- By e-mail: [dpo@acin.pt](mailto:dpo@acin.pt);
- By post: To our head office at Estrada Regional 104, n°42-A, 9350-203 Ribeira Brava, Madeira, Portugal.

## Security measures

GTS undertakes to take appropriate security measures against accidental or unauthorised destruction, loss, modification, access or dissemination and cannot be held liable for any unlawful act which it could not prevent and foresee, in particular for:

- Periodic security tests of the systems, carried out by you or by entities subcontracted for this purpose.
- Use of data encryption mechanisms, both in terms of storage and transmission, on the basis of secure protocols and algorithms (TLS and SHA256).
- Forms for the collection of personal or confidential data require the use of encrypted connections.
- Adoption of the physical and logical security measures that we consider essential for the protection of the personal data of our customers, at the level of the physical infrastructure provided by the *DataCenter* used to store the information managed by the GTS systems.

In the event of a security breach, the management of the ACIN Group, together with the Data Protection Officer (DPO) and the Security Administrator, will endeavour to inform the national supervisory authority (Article 51 of the GDPR) and request the support of this entity to minimise the damage resulting from such a breach.

GTS may disclose your personal data to third parties, provided that:

- It has the consent of the users, in an unequivocal manner;
- As a result of compliance with a legal obligation, a resolution of the National Commission for Data Protection (*Comissão Nacional de Protecção de Dados - CNPD*) or a court order;
- It is necessary for the protection of the vital interests of users or any other legitimate purpose provided by law;

- When this occurs, the user will be duly informed and will be informed of the identity of the recipients and the purpose of the processing of the transferred data.

The user is only authorised to use the contents of our application solely and exclusively for the purposes for which they are intended, and it is expressly forbidden to reproduce, publish or publicly disclose, distribute or make the contents accessible to third parties for the purposes of public communication or marketing, as well as to make any modification to the contents.

The user is expressly forbidden to create or introduce in our application any type of virus or programme that may damage or contaminate it, or to advise third parties to do so.

GTS guarantees the deletion of data once it is no longer required from a legal, financial and accounting point of view.

### Cookies Policy

GTS uses cookies for the operation of the websites, to increase the effectiveness of the websites and to collect website information.

Cookies are small text files sent by the websites you visit and stored on your computer. They are widely used for the operation of web portals, or to increase their effectiveness, as well as to provide information to the owners of the site.

The following table briefly explains the cookies that we use and their purpose.

Google CONSENT, NID	- __cfduid, __utma, __utmz	These cookies are used to collect information about how visitors use our website. The information is used to create reports and to help us improve the site. Cookies collect information in an anonymous form, including the number of visitors, the sites they came from, the pages they visited and the number of times an article is shared and how many new visits are due to that sharing.
GlobalTrustedSign	ci_session, csrf	These cookies are used to protect users and store their session information.

### Changes to the Privacy Policy

We reserve the right to update and modify our policy at any time, and it is our responsibility to inform customers of changes that alter the consent previously reached, and it is at their discretion to continue the contractual act.

In the event that substantial changes are made to this policy, customers will be notified by email or through a notification on our website.

## Acceptance of the Privacy Policy

The use of this system implies your consent and acceptance of the clauses of our Privacy Policy. In case of dispute regarding the terms and conditions of use expressed, Portuguese law shall apply.

## Questions and Suggestions

The collection and processing of personal data will be carried out in accordance with the applicable and current legislation and in compliance with the guidelines of the National Commission for Data Protection (CNPD).

Any matter relating to the collection and processing of the data of GTS Customers shall be governed by the legislation in force.

To learn more about how GTS manages your personal data, or to clarify any doubts, complaints or comments about the Privacy Policy, please contact us through the following contacts.

## Contacts of data protection officers

ACIN iCloud Solutions is the entity responsible for the collection and processing of your personal data for the purposes mentioned herein. If you want to consult the Privacy and Data Protection Policy of ACIN, it is available in three languages:

- <https://www.acin.pt/politica-privacidade> (Portuguese);
- <https://www.acin.pt/es/politica-privacidade> (Spanish);
- <https://www.acin.pt/en/politica-privacidade> (English).

Headquarters: Estrada Regional 104, nº42-A, 9350-203 Ribeira Brava, Madeira, Portugal.

Tel: +351 707 451 451<sup>1</sup>

Tel (international): +351 291 957 888<sup>2</sup>

- Service selection:
  - GTS (option - 3)

Fax: 291 957 171

Email: [dpo@acin.pt](mailto:dpo@acin.pt)

<sup>1</sup> Maximum amount to be paid per minute: 0.09€ (+VAT) for calls from fixed networks and 0.13€ (+VAT) for calls from mobile networks.

<sup>2</sup> Cost of an international call to a fixed network, according to the current rate.

**Document verification**

At least once a year, or when applicable, this policy and its applicability should be reviewed.