



NG TECHNOLOGIES

Building Trust with **Next Generation** Technologies...

NG Technologies Remote Trust Services

Personal Data Protection Policy

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<i>NG Technologies Remote Service</i> Personal Data Protection Policy	PKI-DPP-RTS
	1.0
	Page 1/8



CHANGE HISTORY

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<i>NG Technologies Remote Service</i> Personal Data Protection Policy	PKI-DPP-RTS
	1.0
	Page 2/8



INDEX

1.	<u>PURPOSE AND SCOPE</u>	3
2.	<u>COLLECTION OF PERSONAL DATA</u>	3
3.	<u>COOKIES</u>	4
3.1.	WHAT DO WE USE COOKIES FOR?	4
3.2.	WHAT ABOUT OTHER TRACKING TECHNOLOGIES, LIKE WEB BEACONS?	4
3.3.	HOW CAN YOU MANAGE YOUR COOKIES?	5
4.	<u>USE OF PERSONAL DATA</u>	5
5.	<u>PERSONAL DATA RETENTION PERIOD</u>	5
6.	<u>TRANSMISSION AND TRANSFER OF PERSONAL DATA</u>	6
7.	<u>SECURITY AND CONFIDENTIALITY</u>	7
8.	<u>RIGHT OF ACCESS, TO RECTIFICATION, TO ERASURE AND TO OBJECTION</u>	7
9.	<u>DATA PROTECTION OFFICER</u>	8
10.	<u>MODIFICATIONS OF THE PERSONAL DATA PROTECTION POLICY</u>	8

<i>NG Technologies Remote Service</i> Personal Data Protection Policy	PKI-DPP-RTS
	1.0
	Page 3/8



1. PURPOSE AND SCOPE

The purpose of this Personal Data Protection Policy (PDPP) is to explain how NG Technologies (hereinafter referred to “we/us”), as the company that operates all Remote Trust Services, collects and processes personal data of users of its services acting as a data controller.

The PDPP is intended for users hereinafter referred to as “users” or “you”) of any of Remote Trust Services operated by NG Technologies (hereinafter referred to as “RTS” or “NGRTS”) including Remote Trust, NGSIGN and QRSecure.

This PDPP does not concern processing of personal data collected via our websites neither the collection and processing of personal data of NG Technologies employees/job applicants. A specific DPP is available for each case.

In this PDPP, “personal data” or data of a personal nature is any information relating to a natural person identified or identifiable directly or indirectly based on these data and the term “processing” refers to any operation or set of operations which is performed on personal data, irrespective of the process used.

2. COLLECTION OF PERSONAL DATA

To use Remote Trust Services, the transmission of certain information is mandatory.

Personal data used in connection with our services are collected:

- directly from users of our services;
- by our customers or business partners with which we offer shared services and/or who transfer data to us for the use of the service;
- by your use of our services.

The collection of these data may occur in one of the following phases:

- user account creation in one of the services offered by RTS;
- configuring user parameters in one of the services offered by RTS;
- requesting a certificate;
- signing a document.

The PDPP is applicable irrespective of the method of collection of your personal data.

The data that we collect from you or which may be transmitted our customers/partners depend on your use of the service(s) and may include:

- personal information: surname, first name and birthdate;
- contact information: e-mail address, mobile phone number;

<i>NG Technologies Remote Service</i> Personal Data Protection Policy	PKI-DPP-RTS
	1.0
	Page 4/8



- copy of identity documents (national card, passport or residence permit...);
- service authentication credentials (passwords);
- information that you send to customer service;
- communication preferences (preferred language).

Data on the use of our services are collected automatically, this information depends on the way in which you interact with the service and may include:

- information on the computer, the login environment, i.e. IP address, technical user name(s), error reports and operational data;
- data on your use, such as the features you have used, the settings you have selected, the data on which you have clicked, including the date and time and the webpages (from RTS web pages) visited;
- geographical information on services based on the IP address localization.

3. COOKIES

A cookie is a small text file which is placed on your device. Cookies help to analyze web traffic and allow web applications to respond to you as an individual. RTS web applications can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. Certain cookies may contain personal data – for example, if you click to “remember me” when logging in, a cookie may store your username. Cookies may collect information, including a unique identifier, user preferences, profile information, membership information and general usage and volume statistical information.

3.1. What do we use cookies for?

We use cookies for several reasons. Some cookies are required for technical reasons (e.g to enable “remember me” feature), and we refer to these as "essential" or "strictly necessary" cookies. Other cookies also enable us to track and target the interests of our users to enhance the user experience.

We may place cookies or similar files on your device for security purposes, to tell us whether you have visited the web applications before, to remember your language preferences, to determine if you are new visitor or to otherwise facilitate site navigation, and to personalize your experience. Cookies allow us to collect technical and navigational information, such as browser type, time spent and pages visited.

3.2. What about other tracking technologies, like web beacons?

Cookies are not the only way to recognize or track visitors to a website. We may use other similar technologies from time to time, like web beacons (sometimes called "tracking pixels" or "clear gifs"). These are tiny graphics files that contain a unique identifier that enable us to

<i>NG Technologies Remote Service</i> Personal Data Protection Policy	PKI-DPP-RTS
	1.0
	Page 5/8



recognize when someone has visited our websites or opened an e-mail that we have sent them. This allows us, for example, to monitor the traffic patterns of users from one page within our websites to another and to deliver or communicate with cookies. In many instances, these technologies are reliant on cookies to function properly, and so declining cookies will impair their function.

3.3. How can you manage your cookies?

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) to disable existing cookies; or (iii) to set your browser to automatically reject any cookies. However, please be aware that if you disable or reject cookies, some features and services may not work properly because we may not be able to recognize and associate you with your RTS account(s).

4. USE OF PERSONAL DATA

Depending on your use of the service(s), personal data are used by NG Technologies to:

- create your account, manage your access and enable you to use one or several of our services (Remote Trust, NGSig, QRSecure);
- create your electronic signature or stamp certificate request;
- retain evidence of electronic transactions performed using RTS;
- enable you to request information on RTS;
- process and respond to a request, an order or a service subscription;
- provide technical support;
- offer custom content to make the services more relevant and/or better meet your expectations;
- report modifications, updates and other announcements on services;
- comply with our legal obligations, resolve any disputes and ensure compliance with our agreements.

5. PERSONAL DATA RETENTION PERIOD

All personal data collected are retained for a limited period depending on the purpose of the processing and on the retention period stipulated by the legislation applicable to our services.

End of relationship is materialized by an explicit request by the user to delete the account (s) or by a decision made by NG Technologies following abuse, misuse or absence of use of our services for a given period.

Purposes	Data retention periods prior to their deletion
Create your account, manage your access and enable you to use one or several of our services (Remote Trust, NGSig, QRSecure);	12 months after the end of the relationship
Create your electronic signature or stamp certificate request	20 years after the issuance of the certificate
Retain evidence of electronic transactions performed using RTS Comply with our legal obligations, resolve any disputes and ensure compliance with our agreements.	30 years after the occurrence date of the transaction.
Enable you to request information on RTS services	6 months after the end of the relationship.
Provide technical support	6 months after the end of the relationship.
Report modifications, updates and other announcements on services;	Retention period renewed unless explicit un-subscription.

Upon expiry of the periods specified, the data shall be, if necessary, archived for a period not exceeding the periods stipulated by the applicable archiving regulations.

6. TRANSMISSION AND TRANSFER OF PERSONAL DATA

Other than in the cases stipulated in this PDPP, your personal data shall never be sold, shared or transmitted to third parties by NG Technologies.

If you access the service(s) using a subscription administered by your organisation, your personal data and certain use of data collected by the service can be accessible and shared with your organisation's administrator for the purposes of analysing the use of the service, managing service subscriptions or providing technical assistance.

Your personal data may be transmitted to our service providers with the sole aim of performing the processing for which they were initially collected. In this context, our service providers are personal data processors in accordance with the regulation, they act on our instructions and on

<i>NG Technologies Remote Service</i> Personal Data Protection Policy	PKI-DPP-RTS
	1.0
	Page 7/8



our behalf. They are required to process them in accordance with this Policy. They are not authorized to sell the data or to disclose them to other third parties.

In case of pre-litigation or litigation proceedings, certain of your personal data may also be shared with other service users to confirm or demonstrate the validity of the electronic signatures added using RTS. In this context, only personal data necessary to prove the validity of the transaction shall be transmitted.

Furthermore, if you access RTS via a third-party application, your personal data may be shared with the editor of this third-party application to enable the latter to provide you with access to the application, under the terms of a license and confidentiality policy specific to this editor.

Finally, personal data may be disclosed if we are required to do so by law or by a regulatory provision or if this disclosure is necessary in connection with a judicial or administrative request.

7. SECURITY AND CONFIDENTIALITY

Our concern is to preserve the quality, confidentiality and integrity of your personal data.

To ensure the security and confidentiality of the personal data we collect, we use technical means (networks protected by standard systems such as firewalls, network partitioning, appropriate physical hosting, etc.) and organizational means (strict and individual access control, procedures, security policy, etc.).

When processing your personal data, we take all reasonable measures to protect them against any loss, misuse, unauthorized access, disclosure, alteration or destruction.

People with access to your personal data are bound by a confidentiality undertaking; they shall face disciplinary measures and/or be held liable if they do not comply with these obligations.

In spite of our efforts to protect your personal data, we cannot guarantee on our own the infallibility of this protection given the inevitable risks that are out of our control. Furthermore, if you have an account in any of of the RTS, it is important for you to be careful and to prevent any unauthorized access to this account by keeping your password/pin code confidential and by ensuring you log out in case of shared use of the same computer.

8. RIGHT OF ACCESS, TO RECTIFICATION, TO ERASURE AND TO OBJECTION

Whenever we process personal data, we take all reasonable measures to ensure the accuracy and relevance of your personal data based on the purposes for which we collect them and guarantee that you can exercise your rights regarding these data.

You have a right to access your data, the right to correct them if they are incorrect and, in the cases, and according to the limits stipulated by the regulation, to object to, to erase some of these data, to restrict their use or to request their portability for their transmission to a third party.

All collected data may be modified from your account or directly via your browser regarding cookies. You may also request to update or delete your data by addressing an email to

<i>NG Technologies Remote Service</i> Personal Data Protection Policy	PKI-DPP-RTS
	1.0
	Page 8/8



privcay@ng-sign.com by providing at least a phone number. An NG Technologies operator will call you, in the next working 48 hours, to check your identity and process your request.

9. DATA PROTECTION OFFICER

NG Technologies has appointed a Data Protection Officer responsible for ensuring the protection of personal data and the compliance with the related legal and regulatory requirements.

For any additional information or claims regarding the implementation of the Personal Data Protection Policy, you may contact the latter at the address: privacy@ng-sign.com

In case of unresolved issues relating to the use of your personal data, you may contact the INDPP (Instance nationale de protection des données personnelles, <http://www.inpdp.nat.tn/>).

10. MODIFICATIONS OF THE PERSONAL DATA PROTECTION POLICY

This Policy can be updated based on changes made to the RTS service(s) or if required by the applicable regulation.