



## Privacy Notice

**Version 4.1**

1<sup>st</sup> July 2024

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# Revision History

Date	Author	Description
1 <sup>st</sup> July 2024	GMO GlobalSign	V4.1 – Latest release, minor edits and clarifications
1 <sup>st</sup> June 2022	GMO GlobalSign	V4.0 – Additional jurisdictional information
31 <sup>st</sup> March 2021	GMO GlobalSign	V3.3 - Additional purposes
28 <sup>th</sup> February 2020	GMO GlobalSign	V3.2 - Additional purposes

# 1 Introduction

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 applies where you have a direct relationship with GlobalSign – ie. if you are one of our customers, contacts, suppliers, job applicants, contractors (or ex-employees or previous contractors), then GlobalSign will be acting as data controller (make decisions) in respect of the information that we hold on you. This privacy policy does not apply to products or services offered by 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, update or delete your data.

## **2 Data Controller**

The data controller for personal data collected by GlobalSign within the UK is GMO GlobalSign Ltd, having its registered offices at Springfield House, Sandling Road, Maidstone, Kent, ME14 2LP, United Kingdom.

The data controller for personal data collected by GlobalSign within the EU is GMO GlobalSign NV, having its registered offices at Diestsevest 14, 3000 Leuven, Belgium.

The data controller for personal data collected by GlobalSign within Japan is GlobalSign K.K., having its registered offices at Shibuya Fukuras 9-16F, 1-2-3, Dogenzaka, Shibuya-ku, Tokyo 150-0043, Japan.

As a provider of services, GlobalSign may receive or have access to personal data on behalf of our customers. Such information ("Customer Personal Data") is owned and controlled by our customers, the data controllers for such information, under applicable data protection law. Customer information may include information provided by the customer in support of certain services, such as identification data for verification purposes. As a data processor of the Customer Personal Data, GlobalSign processes the Customer Personal Data pursuant to the instructions from our customers. If GlobalSign receives a data subject request, it may direct you to our Customer, as the controller of the Customer Personal Data.

All questions or requests regarding the processing of data may be addressed to:  
[dpo@globalsign.com](mailto:dpo@globalsign.com).

### **3 Collection of personal information**

We collect information from you when you (i) place an order for a GlobalSign digital certificate or other product or service, (ii) scan your servers for digital certificates using our Certificate Inventory Tool (CIT), (iii) apply for access to our portal and/or 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, (xi) apply for a job at GlobalSign, (xii) share data with social media sites, or (xiii) attend a GlobalSign exhibit.

GlobalSign is a Certification Authority and a 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.

- Contact information such as your name, email address, physical address, and phone number.
- Relationship information that helps us do business with you, such as the types of products and services that may interest you, contact and product preferences, languages, marketing preferences and demographic data.
- Vetting evidences such as ID documentation
- Transactional information about how you interact with us, including purchases, inquiries, customer account information, billing and credit card information, organizational details, transaction and correspondence history, and information about how you use and interact with our website.

We may develop and acquire additional information about you by using third-party (public and private) data sources such as third-party databases and government agencies, as well as your browsing and purchasing history in order to process orders for certificates 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.

## **4 Purposes of processing**

Your personal data will be used for the purposes specified below:

### **4.1 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.

### **4.2 To improve customer service**

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

### **4.3 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.

### **4.4 To send service updates**

In addition, subject to your consent where required, we may send you new service updates, security updates, related product or service information, and status updates on maintenance windows or service availability.

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

Subject to your consent where required, we may send you periodic company newsletters, 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 or exhibitions, your requests for information about similar products and services, or your sharing of data with social media sites such as LinkedIn or Facebook.

### **4.6 To process applications for jobs at GlobalSign**

If you apply to work with us, your information is used to process your application.

### **4.7 Visitors to GlobalSign office premises**

When you visit a GlobalSign office, we will collect some information from you as part of your visit to facilitate you being on the premises such as your name, where you're visiting from, photo for visitor badge for the purposes of visitor management, health & safety, fire risk management and access controls.

## **5 Lawful basis for processing personal data**

We will process your data for the purpose of performance of our contract with you or the legitimate interest of GlobalSign, which are our usual business activities. 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 renewal notices, periodic company newsletters, new service updates, security updates, related product or service information, and status updates on maintenance windows or service availability. See section 11 below for how to withdraw your consent

## **6 Use of cookies and web beacons**

GlobalSign's certificate management systems use cookies to enable the fulfillment of services. Cookies may be used when you log into the system, purchase products or use certain system 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.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies, in addition to cookie management tools on our website. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see <https://www.globalsign.com/en/cookie-policy>

## **7 Use of application logs for diagnostics or other 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 10 (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 10 years.

## **8 Sharing of information and transfer of data**

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

### **8.1 Within GlobalSign**

GlobalSign is a global organisation 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, including but not limited to Europe, Malaysia, United States and Asia in connection with the uses identified in section 3 above and in accordance with this Privacy Policy. Transfers to some countries are recognised as having an adequate level of protection ('adequate countries'). For other countries, we ensure your data is adequately protected, including by entering into agreements containing approved standard contractual clauses with each of our group companies. You can obtain a copy of these agreements from us, by contacting us as outlined in section 19 below.

### **8.2 Third Parties**

We may also transfer your personal data to trusted third parties and our partners in order to serve purposes that are specified in section 3 above. GlobalSign uses a third party to process credit card payments and provides credit card numbers and identifying financial data directly to the third party credit card processor.

In circumstances where data is shared with such third parties, they are required to comply with confidentiality terms included in our data processing agreements. This prohibits such third parties from selling, trading, using, marketing or otherwise distributing GlobalSign customer data. Where any third party is located in another country, we ensure your personal data is adequately protected as explained in section 9.

### **8.3 As Required by Law**

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. Where we process Customer Personal Data on behalf of our customers, it is our customers, in the first instance, who are responsible for telling individuals about any requests.

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).

### **8.4 Mergers & Acquisitions**

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.

## **9 International transfers**

The third parties, subsidiaries and affiliates to which your personal information can be disclosed may be located throughout the world. Therefore, information may be sent to countries having different privacy protection standards than your country of residence. In such cases, we take measures to ensure that your personal information receives an adequate level of protection by ensuring an appropriate safeguard is in place. This may include that the country is recognised as an adequate country (as having an adequate level of protection for personal data). Where we use certain service providers, we will ensure that adequate measures are in place to protect your personal information, including (where necessary) only transferring your personal information to countries that have received an adequacy decision, or by entering into standard contractual clauses to protect your personal information. Please contact us if you want further information on the specific mechanisms used by us to protect your personal data when it is transferred internationally.

## **10 Data retention**

The personal information we collect is retained for no longer than necessary to fulfil the stated purposes in section 4 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 ten (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.

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

## 11 Opting out and 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 certificate management system 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 via the GlobalSign Preference Centre at <https://preferences.globalsign.com/PreferencesCenter/> (for legacy customers), the GlobalSign ATLAS Preference Centre at <https://preferences.atlas.globalsign.com> or by contacting us at one of the addresses shown in section 19 below.

## 12 Your rights

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 exercise your rights 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 efforts to respond to and process your request as required by law.

To the extent of applicable law, you may have the right to request erasure of your personal information, restriction of processing as it applies to you, object to processing and the right to data portability. You also have the right to lodge a complaint with a supervisory authority.

To exercise these, or any data subject rights, please refer to the form at <https://www.globalsign.com/en/data-request-form>

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.

As a provider of services, GlobalSign may receive or have access to personal data on behalf of our customers. Such information ("Customer Personal Data") is owned and controlled by our customers, the data controllers for such information. Customer information may include information provided by the customer in support of certain services, such as identification data for verification purposes. As a data processor of the Customer Personal Data, GlobalSign processes the Customer Personal Data pursuant to the instructions from our customers. If GlobalSign receives a data subject request, it may direct you to our Customer, as the controller of the Customer Personal Data.

## **13 How we protect your information**

To prevent unauthorized access to personal information and to prevent and recover from loss of confidentiality, integrity or availability of personal data, we have established internal policies and procedures for safety measures. In order to achieve the above objectives, we have implemented the following measures

1. Establish a basic policy for the appropriate handling of personal information and personal data in accordance with laws, regulations, and guidelines.
2. Establishment of policies that stipulate rules around acquisition, use, storage, provision, deletion, and disposal of Personal Data, as well as the responsible persons and their roles
3. Organisational security control measures, such as the establishment of a responsible person, clarification of the employees who process personal data and the scope of personal data processing, implementation of a reporting and communication system to the responsible person in the event that a fact or indication of a violation of the law and/or policies are detected, and periodic inspections regarding the Personal Data processing status is in line with policies and procedures.
4. Personal security measures, such as stating matters concerning confidentiality of personal data in employee handbook, and conducting periodic training on personal data processing related rules and policies
5. Physical security measures, such as physical access control for employees, restrictions on equipment brought into the office, and restrictions and controls on the removal of equipment and electronic media and documents that process or contains Personal Data to prevent them from being stolen or lost, etc.
6. Technical security control measures, such as the introduction of systems to protect information systems that handle personal data from unauthorized external access or unauthorized software
7. Implementation of security control measures based on an understanding of the systems for the protection of personal information in the countries where personal data is processed
8. Appointment of a Data Protection Officer who oversees all data handling processes and activities

## **14 Children's Online Privacy Protection Act (COPPA)**

The services are not designed for, not marketed to, minors. We do not knowingly collect or solicit personal information from minors, and we do not knowingly allow such persons to use the services. If you are a minor, please do not attempt to use the services or send any information about yourself to us. In the event that we learn that we have collected personal information from a minor without verified parental consent, we will delete that information as quickly as possible. If you believe we have any information from or about a minor, please contact us using the contact information below

## **15 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 applicable regional laws and regulations.

## **16 Changes to this privacy policy**

If we make material changes to our privacy policy, we will notify by emailing a notice of the availability of a new version with a link to the new version. The current latest version of this document will always be available at <https://www.globalsign.com/en/repository/GlobalSign-Privacy-Policy.pdf>

## **17 Privacy Information Management System (PIMS) policy statement**

GlobalSign is committed to ensuring an effective, scalable and reliable Privacy Information Management System that is capable to rendering efficient and decisive actions in the event of a breach or compromise but also to deliver a strong and robust privacy framework.

The business treats it's responsibilities as temporary custodians of its interested parties' personal data as absolute. It manages the collection, transfer and storage of such information not only in a lawful and ethical manner but also in one which is to be expected from such an organization.

GlobalSign is also committed to adhere to legislative, regulatory and contractual requirements and managing the associated risk.

The policy is dynamic in nature and includes a commitment to continual improvement through a process of incident reporting, risk assessment and regular audits. This policy is reviewed at least annually or if any major changes occur. PIMS policy aims to achieve the intended GlobalSign data protection vision & mission.

## **18 EU and UK representatives**

Those members of the GlobalSign group established outside of the EEA have appointed GMO GlobalSign NV as their EU representative. GMO GlobalSign NV can be contacted at [dpo@globalsign.com](mailto:dpo@globalsign.com)

Those member of the GlobalSign group established outside of the UK have appointed GMO GlobalSign Ltd as their UK representative. GMO GlobalSign Ltd can be contacted at [dpo@globalsign.com](mailto:dpo@globalsign.com)

## 19 Contact us

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

<https://support.globalsign.com/>

<https://support.globalsign.com/customer/portal/emails/new>

<https://jp.globalsign.com/support/>

Group Data Protection Officer  
GMO GlobalSign, Ltd.  
Maidstone House, Office B  
2nd Floor, King Street  
Maidstone, Kent, ME15 6JQ  
United Kingdom  
+44 1622 766 766  
[dpo@globalsign.com](mailto:dpo@globalsign.com)

## 20 Office locations

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