

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”.

Global Trusted Sign ensures that personal data is processed in accordance with applicable Portuguese and international legislation, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council (the General Data Protection Regulation – GDPR).

Accordingly, the processing of personal data by Global Trusted Sign is based on one of the lawful grounds set out in Article 6 of the GDPR, depending on the purpose of the processing, namely the data subject’s consent, the performance of a contract, compliance with a legal obligation to which Global Trusted Sign is subject (including obligations arising under the eIDAS Regulation), or the pursuit of a legitimate interest. Where processing is based on a legitimate interest, such interest consists, in particular, of the continuous improvement of the security, reliability and quality of the services provided by Global Trusted Sign.

Personal data provided within the scope of the qualified services provided by Global Trusted Sign 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.

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

Only duly authorised personnel belonging to Global Trusted Sign’s teams shall have access to personal data and shall be bound by confidentiality obligations, undertaking not to disclose, misuse or otherwise compromise such data, and to act in compliance with applicable data protection and privacy laws.

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 RGDP.

Purpose of Processing and Data Collection:

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.

Global Trusted Sign assumes that the personal data collected has been entered by the relevant data subject or otherwise provided by them, and that such provision has been duly authorised by the data subject. Global Trusted Sign further assumes that the personal data provided is true, accurate and up to date.

Data subjects shall be informed whether the provision of their personal data is a legal or contractual requirement, or a requirement necessary for entering into a contract. They shall also be informed whether they are obliged to provide the personal data and of the possible consequences of failing to do so.

It should also be noted that only the personal data that is strictly necessary for the provision of the relevant services will be collected and requested, in accordance with the information expressly provided on the platform and the choices made by the user.

Personal data relating to clients and data subjects may be collected and recorded by Global Trusted Sign in automated databases for the purpose of carrying out activities that fall within the scope of the purposes for which such data was 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 Global Trusted Sign 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;
- By post: To our head office at Estrada Regional 104, nº42-A, 9350-203 Ribeira Brava, Madeira, Portugal.

Automated Decision-Making

Global Trusted Sign does not subject data subjects to decisions based solely on automated processing, including profiling, which produce legal effects concerning them or similarly significantly affect them.

Security measures

Global Trusted Sign 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 Global Trusted Sign systems.

In the event of a personal data breach, Global Trusted Sign shall notify the relevant national supervisory authority (CNPD) in accordance with Article 33 of the GDPR, without undue delay and, where feasible, not later than 72 hours after becoming aware of the breach. Global Trusted Sign shall also communicate the personal data breach to the data subject where the

breach is likely to result in a high risk to the rights and freedoms of natural persons, in accordance with Article 34 of the GDPR. Global Trusted Sign 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.

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

Cookies Policy

Global Trusted Sign 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.

Strictly necessary cookies required for the operation of the website, including the ci_session and csrf cookies, are installed regardless of the user's consent, as they are essential for the provision of the services requested and for the security of browsing. Other cookies, including those used for statistical analysis, content personalisation or advertising purposes, are only installed after the user's prior, freely given, specific and informed consent has been obtained. Such consent may be withdrawn at any time through the cookie settings available on the website or via the settings of the browser used, without affecting the lawfulness of any processing carried out on the basis of consent before its withdrawal.

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 shall be carried out in accordance with the applicable legislation in force and in line with the guidance issued by the Portuguese Data Protection Authority (Comissão Nacional de Proteção de Dados – CNPD).

Any matters relating to the collection and processing of information concerning Global Trusted Sign's clients shall be governed by the applicable law.

For further information on how Global Trusted Sign processes your personal data, or if you wish to raise any questions, complaints or comments regarding this Privacy Policy, please contact us using the contact details provided below.

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, n°42-A, 9350-203 Ribeira Brava, Madeira, Portugal.

Tel: +351 707 451 451¹

Tel (international): +351 291 957 888²

- Service selection:
 - GTS (option - 3)

Fax: 291 957 171

Email: dpo@acin.pt

Document verification

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

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

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