

# **Privacy Policy**

Effective Date: July 2019

If you have any questions regarding our Privacy Policy, please contact Digital Trust at, [contactus@digitaltrust.ae](mailto:contactus@digitaltrust.ae)

## **1. Our commitment to you**

Digital Trust LLC has been established in 2019 and offers Digital Certificate Services for servers and individuals, managed Public Key Infrastructure (PKI), National PKI and professional trust services to its clients.

Digital Trust LLC is committed to complying with applicable data protection laws and requirements with regard to collection, usage and safety of personal information received from individuals, customers, suppliers, business partners, employees and other people with whom it deals in order to carry out its business.

Digital Trust LLC collects and processes all Personal Information in accordance with the following principles.

- 1) Fairness, lawfulness and transparency - Personal Information is processed lawfully, fairly and in a transparent manner.
- 2) For specific lawful purpose - Personal Information is only collected for specified, explicit and legitimate purposes and not further processed in a way incompatible with those purposes.
- 3) Relevant and not excessive - Personal Information collected and processed by us is adequate, relevant and limited to that which is necessary in relation to the purposes for which it is processed.
- 4) Accurate and up to date - Personal Information collected and processed by us is accurate and, where necessary, kept up to date.
- 5) Data Retention - Personal Information is kept in a form which permits identification of individuals for no longer than is necessary for the purposes for which the Personal Information is processed.
- 6) Technical and organizational security and confidentiality - Personal Information is processed in a manner that ensures appropriate security of the Personal Information, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

- 7) Accountability – Digital Trust is responsible for and can demonstrate compliance with the above principles.

## 2. Definitions

### **"Digital Trust", "we", "us" or "our":**

Means Digital Trust LLC

### **"Customer", "you" or "your":**

Means an individual who: (a) subscribes for, uses or receives, has used or received, or applies to use or receive Digital Trust's products and/or services; (b) corresponds with Digital Trust; and/or (c) is a user of this website.

### **Personal Information:**

Means information that identifies you personally, for example your name, photograph, account number, e-mail address, payment information, user logs or certain numbers associated with your equipment (for example IP address), if Digital Trust can link such information or numbers to you. It does not include aggregate or anonymised information that cannot identify you, even when linked to other information.

## 3. Frequently asked questions

### **3.1 What type of Personal Information does Digital Trust collect?**

- 3.1.1 We will collect the following types of personal information about you when you complete an online form on our web site.

- Full name
- Mobile number
- E-mail address
- Company name

- 3.1.2 As part of Digital Trust's recruitment process, we may also collect the following information from applicants for the review and evaluation of their applications.

- Contact information (name, email address and phone numbers)
- Nationality and age
- Academic qualifications
- Skills and competencies
- Experience certificates or reference Letters
- Resume/CV documents that support your job applications
- Employment history
- Remuneration and benefits package
- Dependents and beneficiary information

- 3.1.3 Collection and use of anonymous web information through the use of Cookies:

During your interaction with Digital Trust's websites, Digital Trust may use a browser feature called a "cookie" to collect information anonymously and track your patterns on Digital Trust's websites. A cookie is a small text file containing a unique identification number that identifies your browser to Digital Trust's computers each time you visit one of the Digital Trust websites using cookies. Cookies tell Digital Trust which pages of its websites are visited and how many people visited each web page. This helps Digital Trust to enhance the on-line experience of visitors to the Digital Trust

websites. Cookies also serve to identify your computer so that your preferences can be saved for future visits and advertising based on your previous interaction with the site, Digital Trust works with third parties that use these cookies to help us with such traffic management, research and analytics.

The use of cookies is an industry standard and many major browsers are initially set up to accept them. You can reset your browser to refuse either to accept all cookies or to notify you when you have received a cookie. However, if you refuse to accept cookies, you may not be able to use some of the features available on Digital Trust's websites.

### **3.2 Why does Digital Trust collect and use Personal Information?**

Digital Trust collects and uses your Personal Information for the following purposes:

- a. to establish and maintain a responsible commercial and legal relationship with you;
- b. where we have a legitimate interest, such as to provide you with our products and/or services;
- c. for research and statistical purposes, to understand your needs as a Customer and your eligibility for products and services
- d. to recommend particular products, services and opportunities to its Customers;
- e. to provide information to you about developments and new products;
- f. to develop, enhance and market products and services and/or provide products and services to its Customers;
- g. to provide customer support;
- h. to meet Digital Trust's legal and regulatory requirements
- i. to send you information, updates you've requested; and
- j. to answer your questions in relation to the products and/or services we provide you or in relation to this Privacy Policy.

### **3.3 How does Digital Trust obtain your consent?**

Sometimes Digital Trust may requests your consent before processing your Personal Information. If so, the form of consent sought by Digital Trust may vary, depending upon the circumstances and the type of Personal Information processed. In determining the form of consent obtained from you, Digital Trust takes into account the sensitivity of the information and your reasonable expectations, so that you understand the nature, purpose and consequences of the collection, use and/or disclosure of your Personal Information. Digital Trust will always seek express consent when the Personal Information is likely to be considered sensitive. Sensitive Personal Information means information about an individual's: race; ethnic origin; politics; religion; trade union membership; genetics; biometrics; health; sex life; or sexual orientation.

Consent may be obtained in any one of the following ways:

- a. an application form may be used to seek consent, collect Personal Information and inform the Customer of the use that will be made of the Personal Information. By completing and signing the form, the Customer is giving consent to the collection and the specified uses;
- b. a series of tick boxes may be used to allow the Customer to request that their names and addresses are not given to other organizations;

- c. orally when information is collected over the telephone; or
- d. at the time a Customer uses a product or service

You may withdraw your consent at any time, although if you do so, it does not mean that anything we have done with your Personal Information with your consent up to that point is unlawful. This includes your right to withdraw consent to us using your Personal Information for marketing purposes. If you wish to withdraw your consent to certain collection, retention, use or disclosure of Personal Information, please contact Digital Trust, at [contactus@digitaltrust.ae](mailto:contactus@digitaltrust.ae)

### **3.4 What happens if you do not provide us with the information we request or ask that we stop processing your information?**

If you do not provide the Personal Information necessary, or you refuse or withdraw your consent for the processing of your Personal Information, where this information is necessary for us to provide a product and/or service to you, we may not be able to provide you with that particular product and/or service. We will explain the impact on you at the time, to help you with your decision.

### **3.5 Who does Digital Trust share Personal Information with?**

We share your Personal Information with trusted third parties where we have retained them to provide products and/or services that you or our customer have requested. These third parties comply with similar and equally stringent undertakings of privacy and confidentiality.

We share your Personal Information with third parties who perform functions on our behalf and who also provide products and/or services to us, such as professional advisors, IT consultants carrying out testing and development work on our business technology systems, research and mailing houses and function co-coordinators. These third parties comply with similar and equally stringent undertakings of privacy and confidentiality.

We share your Personal Information with our other group companies for internal reasons, primarily for business and operational purposes. As we continue to develop our business, we may sell or purchase assets. If another entity acquires us or merges with us your Personal Information will be disclosed to such entity. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such information will be considered an asset of ours and as such it is possible it will be sold or transferred to third parties.

Where required we share your Personal Information with other third parties: to comply with a legal obligation; when we believe in good faith that an applicable law requires it; at the request of governmental authorities conducting an investigation; to verify or enforce our applicable policies; to detect and protect against fraud, or any technical or security vulnerabilities; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of third parties, visitors to the our website, our business or the public.

Digital Trust does not sell your Personal Information. Except as required or permitted by law, when disclosure is made to a third party other than a Digital Trust partner or associate, or a third party service provider, the consent of the individual shall be obtained. Such third parties are provided only with such information as is necessary in the circumstances. Personal Information provided to third parties may be used only for the purpose stipulated.

### **3.6 Will your Personal Information be transferred outside of the country?**

In the event that a third party service provider is located in a foreign country, your Personal Information may be processed and stored in such other foreign country. In such circumstances, the governments, courts or law enforcement or regulatory agencies of that country may be able to obtain access to your Personal Information through the laws of the foreign country. Whenever

your Personal Information is transferred to a foreign country, we will ensure that appropriate safeguards are put in place in relation to that transfer.

### 3.7 How does Digital Trust safeguard your Personal Information?

The nature of the safeguards varies depending on the sensitivity of the Personal Information, the scope of the Personal Information, and the method of storage of that information. More sensitive types of Personal Information will be safeguarded by a higher level of protection, such as encryption. If you would like more information about the safeguards we have in place, please contact us by e-mailing [contactus@digitaltrust.ae](mailto:contactus@digitaltrust.ae)

### 3.8 How long does Digital Trust retain your Personal Information?

Personal Information collected by Digital Trust will be retained in accordance with applicable legal requirements.

Personal Information shall be automatically deleted, if the data is no longer required and there is no legal requirement to maintain that information.

### 3.9 What are your rights?

By law you have a number of rights when it comes to your Personal Information. Further information and advice about your rights can be obtained by the data protection regulator in your country.

Rights	What does this mean?
1. The right to object to processing	You have the right to object to certain types of processing, including processing for direct marketing (i.e. if you no longer want to be contacted with potential opportunities).
2. The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Policy.
3. The right of access	You have the right to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this Privacy Policy).  This is so you're aware and can check that we're using your information in accordance with data protection law.
4. The right to rectification	You are entitled to have your information corrected if it's inaccurate or incomplete.
5. The right to erasure	This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there's no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
6. The right to restrict processing	You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of

	their information to be 'blocked' to make sure the restriction is respected in future.
7. The right to data portability	You have rights to obtain and reuse your personal information for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability.
8. The right to lodge a complaint	You have the right to lodge a complaint about the way we handle or process your personal information with your national data protection regulator.

You may exercise any of the above rights by submitting a request to [contactus@digitaltrust.ae](mailto:contactus@digitaltrust.ae). In certain circumstances, Digital Trust may not be able to provide access to all the Personal Information it holds, for example, when the disclosure would reveal confidential business information; if the Personal Information is protected by solicitor-client privilege, or if the Personal Information was collected during an inquiry into a breach of contract or violation of a law.

### **3.10 How can I challenge compliance and offer suggestions?**

You may direct any questions or inquiries with respect to the privacy principles outlined above or about Digital Trust's privacy practices described in its Privacy Policy to [contactus@digitaltrust.ae](mailto:contactus@digitaltrust.ae)

Digital Trust will investigate all complaints and respond to all questions asked by you. If a complaint is found to be justified, Digital Trust will take appropriate measures to resolve the complaint, which may include amending its policies and procedures.

### **3.11 Your role in protecting your Personal Information:**

Please remember that Digital Trust's Privacy Policy and our use of your Personal Information only applies to the information you provide. We caution that if you disclose Personal Information or sensitive Personal Information through use of the Internet such as through chat rooms, communities, bulletin boards or other public online forums, this information is not collected by or for Digital Trust but may be collected and used by other persons or companies over which Digital Trust has no control. Digital Trust is not responsible for privacy statements, privacy compliance or other content of any website not owned or managed by Digital Trust or its affiliate companies.

Digital Trust does its best to protect and safeguard Personal Information and we believe there are safeguards you should take as well. Do not share your Personal Information with any third party unless you clearly understand the purpose of the request and you know with whom you are dealing. Do not keep sensitive Personal Information in your email inbox or on Webmail.

### **3.12 Updating this Privacy Policy**

Digital Trust will update this Privacy Policy to reflect the changes in our practices and in order to comply with applicable laws. Digital Trust may modify or remove portions of this Privacy Policy when it feels it is necessary and appropriate. Where we do make any changes to this Privacy Policy, we will let you know. You may determine when this Privacy Policy was last updated by referring to the date found at the top of the first page.