



Privacy Policy

(QTSP-DP)

Date	Rev	Description of changes
01-Mar-2019	01	First release
20-May-2020	02	Rewording

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1 Purpose of the document

TrustPro is committed to protect the privacy of individuals who visit the website and who make use of its services.

The General Data Protection Regulation (EU) 2016/679 (GDPR) and the Irish Data Protection Commission (<https://www.dataprotection.ie>) regulate the processing of personal data whether held electronically or in manual form. TrustPro is set to fully comply with the Data Protection Principles as set out in such data protection legislation.

The policy can be easily accessed via a link at the bottom of each web page www.trustpro.eu.

Pursuant to [European Regulation \(EU\) 2016/679](#) (so-called GDPR, General Data Protection Regulation) the processing of information concerning data subject, is based on principles of correctness, lawfulness and transparency and protection of your data confidentiality and your rights.


TrustPro has designated, as foreseen by the art. 37 of Regulation (EU) 2016/679, a Data Protection Officer (DPO) reachable, exclusively for matters related to the processing of personal data, through a specific link in the "Contact" section of TrustPro web site (www.trustpro.eu).

TrustPro has created this Privacy Policy Statement in order to inform of TrustPro commitment to privacy and to describe TrustPro policies for the collection, use and disclosure of personal information that may be collected and compiled by TrustPro.

This policy has been prepared by TrustPro to discharge third parties.

PLEASE REVIEW THIS PRIVACY POLICY BEFORE USING THIS SITE OR REQUEST A TRUSTPRO SERVICE. BY SUBMITTING ANY PERSONAL INFORMATION TO TRUSTPRO YOU AGREE TO BE GOVERNED BY THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY STATEMENT.

The use of this site is also subject to the Terms of Use. Please review these terms for additional details regarding the use of this site.

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2 General Information

2.1 Data Controller

The data controller of this website is TrustPro whose office is situated at, Guinness Enterprise Centre Taylor's Lane, Dublin 8, Ireland, D08 N9EX.

2.2 Definitions

Client – every natural person or legal entity that uses or has expressed their wish to use the services provided by TrustPro.

TrustPro – Qualified Trust Service Provider of certification services, the company and the Registration Authority that processes Client Data.

Ireland Data Protection Commission – the authority that supervises personal data protection.

Client Data – any information about the client that is known to TrustPro (e.g. the client's name, personal identification code, etc.).

Personal Data – any data about a natural person who has been or will be identified irrespectively of the shape or form of such data.

Client Data Processing – any operation carried out with Client Data (incl. client data collection, saving, storage and amendment, granting access, making queries, use, forwarding, etc.), irrespectively of the manner in which the operations are carried out or the tools used for this purpose.


Principles of Client Data Protection – the document that regulates the basics and the terms and conditions of Client Data Processing in TrustPro.

Service – the certification service provided by TrustPro.

Third Party – any person (both a natural person or a legal entity, a branch of a foreign company, or a state or local government agency) that is not a Client, TrustPro, an employee of TrustPro or an authorized data processor.

Authorized Processor – the person who processes Client Data on behalf of TrustPro (on the basis of a subcontract).

Certificate – digital data that enable digital signature and digital identification.

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2.3 Purposes of Client Data Processing

TrustPro processes Client Data in order to provide services to clients (for the creation and servicing of certificates), perform its obligations that arise from legislation (i.e. forwarding data to investigating authorities) and, if necessary, to protect its infringed or contested rights.

2.4 Lawfulness of Client Data Processing

TrustPro considers client data protection extremely important and guarantees that data are collected and processed pursuant to the EU General Data Protection Regulation (Reg. EU 2016/679) and the generally accepted international principles. TrustPro proceeds in all of its activities from the EU standards, the certification service principles and policies of TrustPro, and the principles of Client Data Protection.


2.5 Client Consent to Data Processing

Each Client grants TrustPro its consent to process the Client's data in accordance with these Privacy Policy and service provision policies by submitting to TrustPro a written application for the use of the Service (either directly or via a contract partner).

2.6 Composition of Client Data

TrustPro processes the following personal data of the Client in order to provide the service:

- the first name and surname of the Client (or the organization name in case of Legal Person);
- date and place of birth (or the registration number and VAT code in case of Legal Person);
- physical address
- contact information like email and mobile number
- data regarding the identity documents
- data of the certificate issued to the Client;

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- data of the operations carried out by the client during the use of the Service (suspension of certificates, termination of suspension, annulment, issue of security codes, renewal of certificates, creation of digital signatures, identification with a certificate), which are primarily required to verify the validity of the certificate and the signature.

TrustPro does not process private and sensitive personal data for other purposes such as those specified in this document.

2.7 Client Data Processing for the Purpose of Providing the Service

- The Client is aware that their name and personal identification code are processed, can be disclosed in the database of valid certificates and are present in the certificate associated with digital signature.
- The Client is aware and agrees that the certificate, which contains their name and personal identification code, is forwarded to the person who identifies them the certificate is used for digital identification.
- The Client is aware and agrees that the certificate, which contains their name and personal identification code, is added to the digitally signed document when certificates are used for digital signature.

2.8 Disclosure or Forwarding of Client Data to Third Parties in Other Cases


TrustPro discloses or forwards the Client Data:

- if such an obligation arises from law or any legislation established on the basis thereof (e.g. to investigating authorities);
- to other third parties with the written consent of the Client.

2.9 Security of Client Data Processing

TrustPro protects Client Data with strict security and confidentiality rules, and has implemented organizational, physical and technical security measures for the protection of Client Data.

In Client Data Processing TrustPro does the least that it needs to achieve the purposes of Client Data Processing.

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TrustPro only allows employees who are fully trained and have passed background checks to access Client Data. An employee has the right to process Client Data only to the extent required for the performance of their duties.

2.10 Website information collected and purpose

Download Information

When visiting TrustPro website the following information will automatically be processed and this solely for the use of this association:

- The requested web page or download;
- Whether the request was successful or not;
- The date and time when Client accessed the site;
- The Internet address of the web site or the domain name of the computer from which Client accessed the site;
- The operating system of the machine running Client web browser and the type and version of Client web browser.


Cookies

Cookies are small pieces of data that the site transfers to the user's computer hard drive when the user visits the website. TrustPro Website uses only session cookies which are erased when the user closes the Web browser. The session cookie is stored in temporary memory and is not retained after the browser is closed. Session cookies do not collect information from the user's computer. They will typically store information in the form of a session identification that does not personally identify the user.

Personal data provided by the data subject

When using TrustPro website's online facilities, data subjects may be required to provide their personal data for the purposes of:

- Online Purchase
- Purposes of registration for news updates
- Contacting TrustPro

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Connecting to other websites

To give Client a better service TrustPro site can connect Client with a number of links to other local and international organizations and agencies. When connecting to such other websites Client will no longer be subject to this policy but to the privacy policy of the new site.

2.11 Retention Period of Personal Data

TrustPro will retain personal data until the purpose for which such information has been processed or for any other valid reason (for example to respond to any legal action and to comply with the agreements in force).

Registration information will be retained as long as the account is active or as long as necessary to provide the services. If you wish to request the deactivation of services and the cancellation of registration information, you can contact the Data Protection Officer (DPO) through the "Contact" section of the site www.trustpro.eu.


The Provider preserves the archived data for 20 years after related certificate expiration date.

2.12 Client rights as data subject

Clients can contact the Data Protection Officer (DPO) to assert their rights as provided by the art. 5 ("Principles relating to processing of personal data"), art. 6 ("Lawfulness of processing") and art. 7 ("Conditions for consent") of Regulation 2016/679.

The Data Protection Officer (DPO) can be contacted through the "Contact" section of the site www.trustpro.eu.

As an individual Client may exercise his right to access his data held by TrustPro by submitting a request the data controller. Although all reasonable efforts will be made to keep Client information updated, Client is kindly requested to inform TrustPro of any change of the personal data held by the TrustPro. If a Client consider that certain information about her/him is inaccurate, Client may request rectification of such data. Client also have the right to request the blocking or erasure of data which has been processed unlawfully.

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2.13 Transaction Security Policy

TrustPro website uses Secure Sockets Layer (SSL) to ensure secure transmission of Client personal data. Client should be able to see the padlock symbol in the status bar on the bottom right hand corner of the browser window. The URL address will also start with https:// depicting a secure web page. SSL applies encryption between two points such as Client PC and the connecting server. Any data transmitted during the session will be encrypted or scrambled and then decrypted or unscrambled at the receiving end. This will ensure that data cannot be read during transmission.

3 Changes to this Privacy Policy

TrustPro has the right to amend this privacy policy unilaterally whilst adhering to the requirements stipulated in the EU General Data Protection Regulation (Reg. EU 2016/679) or other legislation who may apply.

TrustPro informs the Client of any amendments made to the Privacy Policy on the internet website or in any other manner (e.g. in mass media) at least 1 (one) month before the amendment enters into force.

It is therefore in Client own interest to check the "Privacy Policy" page to be aware of any changes which may occur from time to time.