

Privacy Policy

pursuant to Article 13 of (EU) Regulation No. 679/2016 ("GDPR")

SSL Server and Code Signing Certificates

As provided for by European Union Regulation No. 679/2016 (hereinafter "GDPR") and Article 13 in particular, please find below the information required by law relating to the processing of your personal data.

SECTION I

Who we are and what data we process (Article 13, paragraph 1 (a), Article 15 (b) GDPR)

If you have chosen to purchase Services relating to the supply of SSL Server and Code Signing Certificates, INTERNET CZ, a.s., located in Ktiš 2, 384 03 Ktiš, Czech republic and Actalis S.p.A., located in Ponte San Pietro (BG), Via San Clemente, no. 53, represented by their legal representatives pro tempore, act as **Co-Data Controllers** and can be reached at the email address privacy@forpsi.com. These Co-Data Controllers collect and/or receive your information for each Certificate issued for the Customer, such as:

Category of data	Examples of types of data
Applicant data and registration documents, qualification certificate data and data found in the qualification certificate	Requests for issuing certificates (data processing form) and documents provided by the applicants, public keys provided by the applicants and personal information of the applicants and titleholders (where they are different parties); results of verifications conducted by the CA; Certificate suspension or withdrawal requests.
Banking information	IBAN and banking/postal account information (except for Credit Card number)
Internet traffic data	Logs, origin IP addresses associated with filling in the data processing form and the logs on the associated transactions.

The Co-Data Controllers *shall* not require you to supply so-called "special" data, that is, according to the provisions of the GDPR (Art. 9), personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, nor any genetic, biometric data for the purpose of uniquely identifying a natural person, data concerning health or natural person's sex life or sexual orientation. Should the services requested from the Co-Data Controllers require the processing of such data, you will receive specific prior notification with a request for your consent.

The Co-Data Controllers have nominated a Data Protection Officer (DPO) who can be contacted for any information or requests:

email: dpo@forpsi.com

Telephone number : +420 38 38 35 35 3

For any information or requests, please contact the following address

privacy@forpsi.com

Telephone number +420 38 38 35 35 3

SECTION II

Why we need your data (Art. 13, paragraph 1 GDPR)

The data is used by the Co-Data Controllers to fulfill the registration request and for the supply contract on the pre-selected Service and/or Product purchase, to manage and execute the contact requests forwarded by you, offer assistance, fulfill legal and regulatory obligations demanded of the Co-Data Controllers in accordance with the activities performed. In no case shall INTERNET CZ and Actalis resell any of your personal information to third parties nor use it for any purpose not stated.

In particular, your data will be processed for:

a) registration and contact information, and/or informational materials

Your personal data is processed to implement preliminary actions and those following a registration request, to manage information and contact requests, and/or to send informational materials, as well as to satisfy any and all other obligations arising herewith.

The legal basis for this processing is to provide the services relating to a request for registration, information and contact, and/or the sending of informational materials, and to comply with legal requirements.

b) administering the contractual relationship

Your personal data is processed to implement preliminary actions and those following the purchase of a Service and/or a Product, to manage the applicable order, to perform the Service itself and/or for production and/or shipping of the purchased Product, the associated invoicing and payment management, handling of any returns and/or notifications to the support service and performance of the support itself, fraud prevention, as well as fulfillment of any and all other requirements arising from the contract.

The legal basis for this processing is to provide the services relating to the contractual relationship and to comply with legal requirements.

c) promotional activities on Services *that are similar to those you have purchased* (Recital 47 GDPR)

The Co-Data Controllers, even without your explicit consent, may use the contact information you provided for direct sales of its own Services/Products, limited to those Services/Products that are similar to the ones included in the sale, unless you specifically object.

d) business promotional activities on Services/Products *that are different from the ones you purchased*

Your personal data may also be processed for business promotional purposes, for market research studies involving the Services/Products that the Co-Data Controllers offer, but only if you have authorized this processing and have not opposed it.

This processing may occur by the following automated methods:

- email;
- sms;
- telephone contact

and may occur:

1. if you have not withdrawn your consent for the use of your data;
2. if processing is done through contact with a telephone operator, and you are not registered on the non-call registry as outlined in Presidential Decree No. 178/2010;

The legal basis for this processing is the consent you initially granted for the processing itself, which you may freely withdraw at any time (see Section III).

e) digital security

The Co-Data Controllers, in line with the provisions of Recital 49 of the GDPR and through their providers (third parties and/or recipients), process your personal data involving traffic only to the extent strictly necessary and proportional to guarantee security of the networks and the information. This means the capacity of a network or information system to block, at a given level of security, any unforeseen events or illegal or malicious acts that would compromise the availability, authenticity, integrity and confidentiality of the personal data stored or transmitted.

The Co-Data Controllers shall immediately notify you if there is any risk of violation of your data, except for any obligations noted in the provisions of Art. 33 of the GDPR associated with notifications of personal data violations.

The legal basis for this processing is to comply with legal requirements and the legitimate interests of the Co-Data Controllers in undertaking processing for the purpose of protecting corporate assets and the security of the Aruba Group's offices and systems.

f) profiling

Your personal data may also be processed for profiling purposes (such as analyzing the transmitted data and the pre-selected Services/Products, suggesting advertising messages and/or business offers in line with user selections) exclusively when you have given explicit and informed consent. The legal basis for this processing is the consent you initially granted for the processing itself, which you may freely withdraw at any time (see Section III).

g) fraud prevention (Recital 47 and Art. 22 GDPR)

- ◆ Your personal data, except for special data (Art. 9 GDPR) or legal information (Art. 10 GDPR) will be processed to allow controls for monitoring purposes and prevention of fraudulent payments. This processing will be done by software systems that run automated checks and will be carried out prior to negotiating Services/Products;
- ◆ a negative result on these checks will render the transaction impossible; you can, in any case, express your opinion, obtain an explanation or dispute the decision by outlining your reasons to the Customer Support Department or to the contact privacy@forpsi.com;
- ◆ personal data collected only for anti-fraud purposes, which differs from the data needed for the proper performance of the service requested, shall be immediately deleted upon termination of the verification phase.

h) protection of minors

The Services offered by the Co-Data Controllers are reserved for those entities legally able, based on national regulations, to satisfy contractual obligations.

The Co-Data Controllers, to prevent illegal access to its own services, implement preventive measures to protect their own interests, such as checking tax identification numbers and/or performing other checks, when necessary for specific Services/Products, the accuracy of the identification data on the identification documents issued by the applicable authorities.

Communication to third parties and categories of recipients (Article 13, paragraph 1 GDPR)

Your personal data is communicated mainly to third parties and/or recipients whose activity is necessary to perform the activities relating to the contract established, and to meet certain legal requirements, such as:

Categories of recipients	Purposes
Companies belonging to the Aruba S.p.A. Group ("Aruba Group")	Fulfillment of administrative and accounting requirements as well as those connected with the contractual services,
Third party providers and companies belonging to the Aruba Group*	Performance of services (assistance, maintenance, delivery/shipping of products, performance of additional services, providers of networks and electronic communication services) associated with the requested service
Credit and electronic payment institutions, banks/post offices	Managing deposits, payments, reimbursements associated with the contractual service
External professionals/consultants and consulting firms	Fulfillment of legal requirements, exercising rights, protecting contractual rights, credit recovery
Financial Administration, Public Agencies, Legal Authorities, Supervisory and Oversight Authorities	Fulfillment of legal requirements, protection of rights; lists and registries held by Public Authorities or similar agencies based on specific regulations relating to the contractual service
Formally mandated subjects or those with recognized legal rights	Legal representatives, administrators, guardians, etc.

* The Co-Data Controllers require their own third-party providers and Data Processors to adhere to security measures that are equal to those adopted for you by restricting the Data Processor's scope of action to processing directly related to the requested service.

The Co-Data Controllers shall not transfer your personal data to countries where the GDPR is not applicable (countries outside the EU) except where specifically indicated otherwise, in which case you will be notified in advance, and if necessary asked for your consent.

The legal basis for this processing is fulfillment of the services outlined in the established contract, compliance with legal obligations, and the legitimate interests of INTERNET CZ and Actalis. to perform the processing necessary for these purposes.

SECTION III

What happens when you do not provide your identification information as needed to perform the requested service? (Article 13, paragraph 2 (e) GDPR)

The collection and processing of your personal data is necessary to fulfill the services requested as well as to perform the Service and/or supply the requested Product. Should you fail to provide your personal data as expressly required in the order form or the registration form, the Co-Data Controllers will not be able to carry out the processing associated with managing the requested services and/or the contract and the Services/Products associated with it, nor fulfill the operations dependent on them.

What happens when you do not provide the consent for processing personal data for the business promotion activities on Services/Products *that are different* from those purchased?

When you do not give your consent to the processing of your personal data for these purposes, the processing will not be implemented for these specific purposes, but it will not affect the performance of the requested services or those for which you have already given your consent, if requested.

In the event you have given consent and later withdraw it or oppose the processing for business promotional activities, your data will no longer be processed for these activities, although this will not create negative effects or consequences for you or the services requested.

How we process your data (Article 32, GDPR)

The Co-Data Controllers make use of appropriate security measures to preserve the confidentiality, integrity and availability of your personal data, and require the same security measures from third-party providers and the Processors.

Where we process your data

Your data is stored in hard copy, electronic and remote archives located in countries where the GDPR is applicable (EU countries).

How long is your data stored? (Article 13, paragraph 2 (a) GDPR)

Unless you explicitly express your own desire to remove it, your personal data will be stored until required for the due purposes for which it was collected.

In particular, the data will be stored for the entire duration of the contractual relationship governing the Services and in any case no longer than 12 (twelve) months from its termination.

For data provided to the Co-Data Controllers for the purposes of business promotion for services other than those you have already purchased, for which you initially gave consent, it will be stored for 24 months, except when such consent is withdrawn.

For data provided to the Co-Data Controllers for the purposes of profiling, it will be stored for 12 months, again except when consent has been withdrawn.

It is also important to add that, should the user forward to the Co-Data Controllers any personal data that has not been requested or that is unnecessary for the purposes of performing the services requested, or for the performance of services strictly connected thereto, the Co-Data Controllers cannot be considered controllers of this data and will proceed to delete it as soon as possible.

Regardless of your decision to remove the data, your personal information will be, in any case, stored according to the terms outlined in current law and/or national regulations, for the exclusive purpose of guaranteeing specific requirements, applicable to certain Services. In particular, for each Certificate issued for the Customer, the following information shall be stored by the Co-Data Controllers, each one handling its own area of application based on the information in the Contract, for at least 7 years from the expiration of the Certificate itself:

(i) Certificate issuance applications (data processing form);
(ii) the documentation provided by the applicants;
(iii) the public keys provided by the applicants;
(iv) the personal data of the applicants and titleholders (if different parties);
(v) the results of the checks undertaken by the CA;
(vi) Certificate suspension or revocation requests;
(vii) the Certificate itself;
(viii) furthermore, the IP address associated with the Internet connection used to complete the online form and the log of the corresponding transaction will also be identified and stored, for the purposes of helping to identify the applicant in relation to the personal details declared and the other declarations made by the applicant.
Furthermore, personal data shall in any case be stored to comply with obligations (e.g. for tax and accounting purposes) which may continue even after termination of the contract (Art. 2220 Civil Code); for these purposes, the Co-Data Controllers shall retain only the data necessary to complete these activities.

For those cases where the rights arising from the contract and/or registration are used in the courts, your personal data, exclusively required for these purposes, shall be processed for the time necessary to complete them.

What are your rights? (Articles 15 - 20 GDPR)

You have the right to obtain the following from the Co-Data Controllers:

a) confirmation on whether your personal data is being processed and if so, to obtain access to your personal data and the following information:

1. the purposes of the processing;
2. the categories of personal data concerned;
3. the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular if these recipients are in third party countries or are international organizations;
4. when possible, the envisaged period for which your personal data will be stored, or, if not possible, the criteria used to determine this period;
5. whether you have the right to request from the Data Controller rectification or erasure of your personal data or restriction of processing of your personal data or to object to such processing;
6. the right to lodge a complaint with a supervisory authority;
7. in the event the data is not collected from you, any available information as to their source;
8. whether there is an automated decision-making, including profiling, and, at least in these cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for you.
9. the appropriate safeguards provided by the third party country (outside EU) or international organization to protect any transferred data

b) the right to obtain a copy of the personal data processed, again given that this right does not affect the rights and freedoms of others; for extra copies requested by you, the Data Controller may charge a reasonable fee based on administrative costs.

c) the right to obtain from the Data Controller without undue delay the rectification of your inaccurate personal data

d) the right to have your personal data erased by the Data Controller without undue delay, if there are the reasons outlined in the GDPR, Article 17, including, for example, if the data is no longer needed for the purposes of processing or if the data is considered unlawful, and again, if there are no conditions outlined by law; and in any case, if the processing is not justified by another equally legitimate reason;

e) the right to obtain restriction of processing from the Data Controller, in those cases outlined in Art. 18 of the GDPR, for example where you have contested the accuracy, for the period necessary for the Data Controller to verify the data's accuracy. You must be notified, within an appropriate time, even when the suspension period has passed or the cause of restricting the processing has been eliminated, and therefore the restriction itself has been lifted;

f) the right to obtain information from the Data Controller on the recipients who have received the requests for any rectification or erasure or restriction of the processing implemented, except when this is impossible or involves a disproportionate effort.

g) the right to receive your personal data in a structured format, commonly used and readable by automatic devices as well as the right to transmit this data to another Data Controller without hindrance from the Co-Data Controllers to which the data has been provided, in those cases outlined by Art. 20 of the GDPR, and the right to have your personal data transmitted directly from one Data Controller to another, if technically feasible.

For further information and to send your request, contact the Data Controller at privacy@forpsi.com. To guarantee that the rights noted above are exercised by you and not by unauthorized third parties, the Co-Data Controllers may require you to provide other information necessary for this purpose

How and when can you oppose the processing of your personal data? (Art. 21 GDPR)

For reasons associated with your particular situation, you may at any time oppose the processing of your personal data if it is based on legitimate reasons or if it is done for business promotional activities, by sending a request to the Co-Data Controllers at privacy@forpsi.com.

You have the right to have your own personal data deleted if the Co-Data Controllers have no legitimate reason prevailing over such request, and in any case, where you have opposed the processing for business promotional activities.

Who can you lodge a complaint with? (Art. 15 GDPR)

Without prejudice to any other ongoing administrative or judicial action, you may lodge a complaint with the applicable supervisory authority of the Italian territory (Italian Personal Data Protection Authority), that is, with the agency that performs its duties and exercises its rights within the member country where the GDPR violation occurred.

Any updates to this information shall be communicated in a timely manner and through suitable means, and will be notified to you if the Co-Data Controllers process your data for purposes other than those outlined in this policy prior to proceeding and after you have given your consent, if necessary.

SECTION IV

COOKIES

General information, deactivation and cookie management

Cookies are data sent from the website and stored by the internet browser in your computer or other device (for example, tablet or cellphone). Technical and third party cookies may be installed from our internet site or associated subdomains. In any event, you can manage, that is, request general deactivation or deletion of the cookies by changing the settings on your web browser. However, this deactivation may delay or block access to some parts of the site.

Settings to manage or deactivate cookies can change depending on the internet browser used. Therefore, to get more information on the methods by which these operations are completed, we advise you to consult the manual for your specific device or the "Help" function for your specific web browser.

Below are links that explain how to manage or disable cookies for the most common web browsers:

- Internet Explorer: <http://windows.microsoft.com/it-IT/internet-explorer/delete-manage-cookies>

- Google Chrome: <https://support.google.com/chrome/answer/95647>
- Mozilla Firefox: <http://support.mozilla.org/it/kb/Gestione%20dei%20cookie>
- Opera: <http://help.opera.com/Windows/10.00/it/cookies.html>
- Safari: <https://support.apple.com/kb/PH19255>

Technical cookies

The use of technical cookies, that is, those cookies needed to transmit communications over electronic communication networks, or those cookies that are strictly necessary for the provider to fulfill the service requested by the customer, allows our website to be used securely and efficiently.

Session cookies can be installed to allow access and permanence within the portal's reserved area as an authenticated user.

Technical cookies are essential for our website to work properly and are used to allow users to navigate normally and have the possibility of using the advanced services available on our website. The technical cookies used are considered session cookies, stored exclusively for the navigation period up until the browser is closed, while persistent cookies are saved in the user's device until they expire or are deleted by the user. Our site uses the following technical cookies:

- Technical navigation or session cookies, used to manage normal navigation and user authentication;
- Functional technical cookies, used to memorize user personalization, such as, for example, language;
- Technical analytic cookies, used to recognize the way in which the user utilizes our website, in order to evaluate and improve functionality.

Third party cookies

Third party cookies may be installed: these are analytic and profiling cookies from Google Analytics, Google Doubleclick, Criteo, Rocket Fuel and Facebook. These cookies are sent to our website by these external third party websites.

Third party analytic cookies are used to identify information on the behavior of users on the website. Identification is done anonymously to monitor services and improve the site's usability. Third party profiling cookies are used to create profiles associated with the users, to propose publicity messages in line with the choices made by the users themselves.

The use of these cookies is governed by the regulations established by the third parties themselves, and therefore Users are asked to review the privacy information and information on managing or disabling the cookies published on the following web pages:

For Google Analytics cookies:

- privacy policy: <https://www.google.com/intl/it/policies/privacy/>
- information to manage or disable cookies: <https://support.google.com/accounts/answer/61416?hl=it>

For Google Doubleclick cookies:

- privacy policy: <https://www.google.com/intl/it/policies/privacy/>
- information to manage or disable cookies: <https://www.google.com/settings/ads/plugin>

For Criteo cookies:

- privacy policy: <http://www.criteo.com/it/privacy/>
- information to manage or disable cookies: <http://www.criteo.com/it/privacy/>

For Facebook cookies:

- privacy policy: <https://www.facebook.com/privacy/explanation>
- information to manage or disable cookies: <https://www.facebook.com/help/cookies/>

For CrazyEgg cookies:

- privacy policy: <https://www.crazyegg.com/privacy/>
- information to manage or disable cookies: <https://www.crazyegg.com/cookies/>

For Rocket Fuel cookies:

- privacy policy: <http://rocketfuel.com/it/privacy/>
- information to manage or disable cookies: <http://rocketfuel.com/it/cookie-policy/>

For Youtube cookies:

- privacy policy: <https://www.youtube.com/intl/it/yt/about/policies/#community-guidelines>
- information to manage or disable cookies: <https://support.google.com/accounts/answer/61416?hl=it>

For Yahoo cookies:5

- privacy policy and information to manage or disable cookies:
<https://policies.yahoo.com/ie/it/yahoo/privacy/eu oathnoticefaq/>

For Bing cookies:

- privacy policy and information to manage or disable cookies:
<https://privacy.microsoft.com/it-it/privacystatement>

Profiling cookies

Profiling cookies may be installed by the Data Controller(s) using so-called *web analytics* software. These are similar to those used to prepare detailed reports and real time analyses relating to information on: website visitors, originating search engines, key words used, user language, and most visited pages.

They can also collect information and data such as IP address, nationality, city, date/time, device, browser, operating system, screen resolution, navigation origin, pages visited and number of pages, visit duration, and number of visits made.

This data may be forwarded to each of the Aruba Group companies in accordance with and within the limits established by current law and by the provisions outlined in this Privacy Policy.

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