



TrustFactory (Pty) Ltd Privacy Policy

1 Introduction

This privacy policy details how we, TrustFactory (Pty) Ltd (Registration number 2017/285600/07), process your personal information. Where we refer to “process”, it means how we collect, use, store, make available, destroy, update, disclose, or otherwise deal with your personal information. As a general rule we will only process your personal information if this is required to deliver or offer a service, provide a product or carry out a transaction.

If you use our services, goods, products, and service channels you agree that we may process your personal information as explained under this Privacy Policy. Sometimes you may provide us with consent to process your personal information.

Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your personal information because it may limit your rights.

Any third party including our partners and resellers that offer TrustFactory products and services are required to maintain a similar privacy policy, and we advise you to read the third-party privacy policies.

We can change this Privacy Policy from time to time if the law or its business practices requires it. This version of the Privacy Policy displayed on our website will apply to your interactions with us.

2 What is personal information?

Personal information refers to any information that identifies you or specifically relates to you. Personal information includes, but is not limited to, the following information about you:

- your marital status (like married, single, divorced);
- your national origin;
- your age;
- your language, birth and/or education;
- your financial history (like your income, third party payments made on your behalf etc.);
- your identifying number (like an employee number, identity number or passport number);
- your e-mail address, physical address (like residential address, work address or your physical location) and/or telephone number;
- your biometric information (like fingerprints, your signature or voice);
- your race, gender, sex, pregnancy, ethnic origin, social origin, color and/or sexual orientation;
- your physical health, mental health, well-being, disability, religion, belief, conscience and/or culture;
- your medical history (like your HIV / AIDS status), criminal history and/or employment history;
- your personal views, preferences and opinions;
- your confidential correspondence; and/or
- another’s views or opinions about you and your name also constitute your personal information.

3 When will we process your personal information?

We treat your personal information as confidential, except the information entered into an issued digital certificate. We will only process your personal information for lawful purposes relating to our business if the following applies:

- if you have consented thereto.
- if a person legally authorized by you, the law, or a court, has consented thereto.
- if it is necessary to conclude or perform under a contract, we have with you.
- if the law requires or permits it.
- if it is required to protect or pursue your, our or a third party’s legitimate interest.

4 What is special personal information?

Special personal information is personal information about the following:

- your race (like where a company submits reports to the Department of Labour where the statistical information must be recorded).
- your ethnic origin.
- your trade union membership.
- your health (like where you apply for an insurance policy).
- your biometric information (like to verify your identity); and / or your criminal behaviour and alleged commission of an offence.



5 When will we process your special personal information?

We may process your special personal information in the following circumstances:

- if you have consented to the processing.
- if the processing is needed to create, use, or protect a right or obligation in law.
- if the processing is for statistical or research purposes and all legal conditions are met.
- if the special personal information was made public by you.
- if the processing is required by law.
- if racial information is processed, and the processing is required to identify you; and / or if health information is processed, and the processing is to determine your insurance risk, or to comply with an insurance policy or to enforce an insurance right or obligation.

6 When and from where we obtain personal information about you

We collect personal information from 3rd parties that are directly integrated with our software platform.

We collect information about you based on your use of our products, services, or service channels.

We collect information about you based on how you engage or interact with us such as via our support desk, emails, letters, telephone calls and surveys.

If the law requires us to do so, we will ask for your consent before collecting personal information about you from third parties.

7 What information do we collect?

We collect information from you when you:

- place an order for a TrustFactory digital certificate;
- apply for access to the managed service platforms;
- fill out a form for pre/post sales assistance; or
- open a support ticket.
- enter into a partner reseller agreement with TrustFactory

TrustFactory is a Certification Authority and trusted third party.

To fulfill requests for digital certificates, you may be asked to provide your name, email address, physical address, phone number, credit card information or organizational details, government issued unique photo identification number, or other personal information.

8 What do we use your information for?

We collect your personal information for the following uses.

8.1 To process applications for our products and services

Your information may be verified using third party commercial and/or government resources. Your information, will not be sold, exchanged, transferred, or given to any other company for any reason without your consent, other than for the purpose of delivering the purchased product or service requested and publication of your certificates.

8.2 To improve customer service

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

8.3 To send renewal notices

The email address you provide for order processing may be used to send you renewal notices prior to your digital certificate expiration.

8.4 To send periodic emails

We will send you periodic company newsletters, new service updates, security updates, product or service related information, and status updates on maintenance windows or service availability.



9 Where is the data stored?

Your information is transferred to secured servers in a data center in South Africa. The data protection and privacy processes, tools and technologies applied to the data meet international standards.

10 How we secure your personal information

We will take appropriate and reasonable technical and organizational steps to protect your personal information according to industry best practices. Our security measures (including physical, technological, and procedural safeguards) will be appropriate and reasonable. This includes the following:

- keeping our systems secure (like monitoring access and usage);
- storing our records securely.
- controlling the access to our buildings, systems and/or records; and
- safely destroying or deleting records.
- Ensure compliance with international ISO security standards.
- You can also protect your personal information. Please visit the website of the relevant business you have established a business relationship with for more information.

11 Security

We implement a variety of security measures to maintain the safety of your personal information when you place an order or enter, submit, or access your personal information. All supplied sensitive information (like financial information) is transmitted via Secure Socket Layer (SSL) and then stored in our database to be accessed only by authorized individuals with limited access rights to our systems and who are required to keep the information confidential.

Your sensitive information, will be kept on file to meet audit requirements and to facilitate renewals. Your credit card details are not stored on our systems.

We use a reputable third party to:

- process credit card payments; and
- provide credit card numbers and financial information directly to the third-party credit card processor.

Such information is shared securely.

12 Our cookies policy

A cookie is a small piece of data sent from our websites or applications to your computer or device hard drive or Internet browser where it is saved. The cookie contains information to personalize your experience on our websites or applications and may improve your experience on the websites or applications. The cookie will also identify your device, like the computer or smart phone. Our website uses cookies to enable the fulfillment of our services. Cookies may be used when you log onto our website to purchase products or use certain functions.

By using our websites or applications you agree that cookies may be forwarded from the relevant website or application to your computer or device. The cookie will enable us to know that you have visited the website or application before and will identify you. We may also use the cookie to prevent fraud and for analytics.

13 Use of server logs for diagnostics or to gather statistical information.

Our servers automatically record information (log data) created by your use of our services. Log Data includes information like your IP address, browser type, operating system, the referring web page, pages visited, your location, your mobile carrier, device and application IDs, search terms, and cookie information. We use this information to diagnose and improve our services.

14 Your rights and obligations

Our assurances apply to the entire TrustFactory network and to personal information collected for issuing our products and services.

You must give your explicit consent to process your personal information.

We use your personal information to identify you, verify your details and subsequently offer our digital certificate products and services to you and publication of your certificates.



You can review your personal information that we hold and check whether it is accurate.

You can update and rectify your personal information at any time by changing it on our subscriber self-service portal (available via our website).

You may request us to erase your personal data or request a restriction or withdraw consent on processing the data. However, we will act on your instructions as long as it is legally permissible and allows us to maintain compliance with international standards on the management and audit of public Certification Authorities.

If you have given consent for personal data to be used for direct marketing purposes, then you shall have the right to object, and withdraw consent, at any time to processing of your personal data for such marketing.

You have the right to lodge a complaint with TrustFactory or any Regulator with jurisdiction about an alleged contravention of the protection of your personal information.

15 Retention

We will only keep your personal information for as long as is necessary to fulfil our obligations to you, unless you have given us permission to keep it longer or we are otherwise legally allowed to do so.

To meet public CA audit requirements as detailed in our Certification Practice Statement, personal information used to fulfill verification of digital certificate applications (including Log Data) will be retained for a minimum of 7 years after certificate expiry.

We may retain your information either a physical or electronic format, depending on the class of product or service.

16 Updating your email preferences

You may unsubscribe from receiving future emails from us by sending us a request to unsubscribe.

17 Disclosure

We may share your personal information with third parties for the purposes of fulfilling our obligations to you, including with:

- other companies or divisions within our network;
- our contractors who help provide part of our goods and services; or
- third parties as required by applicable law.

In circumstances where information is shared with such third parties, they are required to agree to confidentiality terms. This prohibits such third parties from selling, trading, using, marketing or otherwise distributing our customer information.

18 Transfer

We may transfer your personal information outside of the country in which it was collected to a foreign country. We will only transfer your personal information to third parties in another country in any one or more of the following circumstances:

- where your personal information will be adequately protected under the other country's laws or an agreement with the third-party recipient.
- where the transfer is necessary to enter into or perform under a contract with you, or a contract with a third party that is in your interest.
- where you have consented to the transfer; and / or
- where it is not reasonably practical to obtain your consent, the transfer is in your interest.

This transfer will happen within the requirements and safeguards of the law. Where possible, the party processing your personal information in the other country will agree to apply the same level of protection as available by law in your country or if the other country's laws provide better protection the other country's laws would be agreed to and applied.

19 Termination

Termination of your account does not mean your personal information has been deleted from our database. We will retain and use your personal information as necessary in order to comply with our legal obligations, resolve



disputes, or enforce our agreements.

20 Breach notification

We have an incident management process in place to respond to data breaches. Where there are reasonable grounds to believe there is a data breach, and your personal information has been accessed or acquired by any unauthorized person, then we shall without undue delay notify you and the Information Regulator about the breach.

21 Relevant laws

We commit ourselves to protect the personal information you submit to us for our public certification services. As a South African company, we declare to fully respect all rights established and laid out in terms of South African laws for the protection of personal information.

22 Contact Details

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please contact our Data Protection Officer using the details below.

Email : info@trustfactory.net

Phone : + 27 (0)11 880 6103

Physical Address : 6th Floor, Firestation Rosebank
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