

Privacy Policy

KIBSTrust

Last modified: 24.09.2021 (see the archived versions)

KIBS AD Skopje (KIBS) promotes and implements a large part of its operations through its websites which are the basic tool for communication with the stakeholders regarding our products and services. Different KIBS business lines, each with its own specifics, can be addressed differently in respect to the privacy of your personal data. This Privacy Policy does not apply to services related to KIBS as a payment system operator, services related to information resulted from or based on information for or from the payment system, as well as services offered through our partners or resellers.

This Privacy Policy (Policy) is a result of our endeavor to bring our customers closer to the processing of personal data related to the activities of the Trusted Service Provider (TSP) which is organizationally part of KIBS but operates under the brand name KIBSTrust, hence the term "Trusted Service Provider) KIBS" is identified with "KIBSTrust".

KIBSTrust stores only the personal data that is necessary to exercise business, legal and other powers related to its business activity.

In full compliance with the legal obligations, KIBSTrust takes care of your right to privacy. This Policy is prepared to inform you about the practice of how we implement our obligations in internal operations and work with our users of products and services. KIBSTrust products and services are hereinafter referred to as: Services.

This Policy applies where you, as our service user, have a direct relationship with KIBSTrust, in other words, you are one of our customers, contacts, suppliers, contractors (including former employees or former contractors). In such circumstances KIBSTrust will act as a data controller (will make decisions) related to observing the data we hold about you.

This Policy does not apply to products or services offered by our partners, agents, other third parties and their services or websites which you may access while browsing our websites. In reference to the foregoing, we encourage you to read the Privacy Policy of those third parties.

Below we will inform you what data we collect about you, how we use the collected data, where the data is processed, your rights related to the data we store about you, how you can withdraw the permission to use your data, the security provisions of your data storage, and how to update or delete your data.

1. Consent

By entering your data on our websites or mobile applications, you expressly agree to this Privacy Policy, that is, you accept the terms set forth in it. If you do not agree to any part or all of this Policy, do not continue your activity on our websites or our mobile applications.

2. What type of information do we collect?

KIBSTrust collects your data when you place an order for any digital certificate or time stamp, you want to create your electronic identity, apply for access to the services, subscribe to one of our newsletters, you use our online chat service, download information documents about our services, register for a webinar, respond to a survey or fill in an assist form before or after a sale of services, or when you make a support request.

Without limitations to the preceding paragraph, we may request information from you that may be personal whenever you interact with us and in order to receive service, support or information from us.

You may be asked to enter your first and last name or other data contained in your personal identification documents, e-mail address, postal address, numbers of personal identification documents, personal identification number, insurance number, mobile phone number, parameters that can help us improve marketing, download technical data for your mobile device, download your biometric data including photo and / or video material that confirms your liveliness, details of the organization you work for and other personal data.

If, based on your wish, you choose to pay for our services by using our virtual e-shop, you will be asked for data related to your payment card by the card processor through which the payment is provided. Please ask for and read the Card Payment Provider Privacy Policy on its website.

KIBSTrust treats personal identification data as confidential, except for data that is part of the issued digital certificate. This data can be verified using external commercial applications and as such is considered to be public and allows verification of your electronic identity.

Depending on the business activities and needs, we can collect additional information about you by using data sources - third party databases (public and private) and / or databases made available to us by state institutions in order to improve our services.

KIBSTrust does not store your sensitive financial transaction data (payment card number, financial information, etc.).

You will be always asked to provide consent to the public disclosure of your data.

3. What do we use your data for?

The personal data that will be requested from you and the reasons for its request will be clearly stated at the time of the request. Regardless whether your personal data is publicly available or private, it will not be sold, exchanged, or put on disposal to any other company. We use your personal data to carry out our business activities, legal obligations, and requirements. We collect personal data when:

3.1. Creating your account

Creating an account is a mandatory element for receiving a service from KIBSTrust. The account can be created within the website or mobile application. You manage the account. Closing the account does not mean deleting your personal data from KIBSTrust systems.

3.2. Service order processing

Your data, public or private, will not be sold, exchanged, given, or delivered to another company for a reason that is not in accordance with the defined working process of service delivery without your consent.

3.3. Improving customer service

Your data helps us respond more effectively to your requirements before and after the sale and the requirements of the technical support.

3.4. Sending recovery notifications

The e-mail address you provide for processing the order can be used to send you notifications for issuance, revocation, renewal of digital certificates, expiration of deadlines and information on the performance of other services in accordance with publicly announced rules and procedures for their issuance, depending on the service or product.

3.5. Sending messages via e-mail

KIBSTrust can send you message for:

- periodic bulletins for the activity, issuance of a new version of service, to inform you about security updates, information related to the services, surveys, as well as notifications on the status of the implemented system maintenance or availability of the services;
- information about the verification of your identity either face-to-face with our authorized employees or remotely and assessment whether you will become a user of our services or products and services of third parties, in accordance with the publicly announced rules and procedures for conducting these activities (CP/ CPS).

4. Obligation to report data change

As our client, you are obliged to inform us upon every change of data that you have previously voluntarily entrusted us with.

5. Sharing personal data

To ensure quality of work, better technical performance, for statistical purposes and marketing while creating services, we create partnerships with other companies (third parties). In such strictly controlled conditions, we can share your personal data and your personal data can be processed based on our legitimate reason for providing products and services to all our users.

Below is a review of the companies' profile and the reason for establishing a partnership. This is not a final review and can be changed according to our needs for constant improvement. We work with analytics indicator providers, financial institutions and we may obtain information about you from them. We may cooperate with Twitter, Google, Facebook, LinkedIn and others to enable you to register for the Services using the credentials you hold with those companies. Below is a non-exhaustive list of third parties we work with. The cooperation can be continuously expanded or we can stop working.

Third party	Why we work with them
EU Trusted Service Provider	For the provision of specific technical and technological services for which KIBSTrust does not invest funds in its infrastructure.
Company for providing personal identity and identification documents verification	A specific service for which KIBSTrust does not invest in its infrastructure.
Various financial companies (banks, funds, insurance companies, etc.)	Placement of our products and services, including enabling us to collect, process and store identity data.
International companies that provide Internet browsing and search services and social networking platforms	Monitoring the performance of our online offer, for statistical processing of data related to the activity of our websites, marketing.

Additionally, we may disclose your personal data to third parties:

- if we are obliged to disclose or share your personal data in order to comply with any legal or regulatory obligation or requirement;
- enforce or apply the terms of use of our services and other agreements or investigate potential breaches; or
- to protect the rights, property or security of our systems or our other users.

6. Keeping data

In order to meet the audit requirements of the TSP, the personal data that is filled in or collected during the application will be kept for a minimum of ten (10) years depending on the product or service class and may be retained in hardcopy or electronic form. For all details, please read the rules and procedures published for each KIBSTrust service, published in the public document repository:

<https://www.kibstrust.com>

7. Cancellation of e-mail notifications

If you wish to cancel receiving e-mails at any time, you can do so through the cancellation instructions published on the trusted provider's websites and / or included at the end of each e-mail.

8. How do we protect your information?

KIBSTrust undertakes all prescribed technical and organizational measures for the protection of personal data, prevention of unauthorized access and their abuse, seeking to apply the latest achievements in this field.

Our protection procedures are subject to regular controls carried out in accordance with the European standards and requirements of the domestic legislation, and are a result of the latest technological achievements.

9. Use of web cookies to perform services

Web cookies are small text files that are stored on your computer to track and / or enhance user's perception of the websites they visit.

KIBSTrust uses cookies when completing online services. For more information on using cookies, visit our website:

<https://www.kibstrust.com/Repository/repositoryMK.aspx>

in a document related to our Cookies Policy. On our websites, as a user, you have the opportunity to give or refuse to give consent to the usage of the type of cookies used.

10. Using records for diagnostic or collecting statistical information

Our servers automatically record information (create records - logs), created by your use of our services. The data in these records may contain information such as your IP address, type of browser, operating system, referent web pages, visited pages, location, your mobile operator, device and application identifiers, browsing terms, and cookies information. We use this information for diagnostics and improvement of our services. We will either delete the data from the records or remove any account identifiers, such as username, full IP address or e-mail address, ten (10) years after your last activity.

11. Do we disclose information to third parties?

We do not sell, trade, or otherwise transfer your personal information to third parties. This does not include trusted third parties who assist us in the operation of our website, the completion of applications for digital certificate or any other services that help us optimize or add value to the services we offer, such as offering integrated products or services of third parties. In circumstances where data is shared with such third parties, they are required to comply with the terms of confidentiality. This prevents such third parties from selling, trading, marketing or otherwise distributing information about KIBS users.

We may also make your information available to third parties when we believe that this is in compliance with the law or to protect our rights, property or security.

Our policy is to inform you that there is a requirement for transfer of your personal data on the basis of law, unless that transfer is prohibited by another law or court order.

12. Registration

Proper registration has been made with a competent body in accordance with the legal obligation regarding the collection, processing and archiving of personal data. For more information about our registration or filling a complaint against us, you can contact:

Personal Data Protection Agency

bul. Goce Delchev no. 18

PO Box 417, 1000 Skopje

<https://www.dzlp.mk/mk/kontakt>

13. Summary: collecting personal data and your rights

In accordance with the legal regulations in the Republic of North Macedonia, you have established rights for protection of privacy that KIBSTrust fully respects. In addition, we strive to respect the European Union rules for protection of privacy.

Manner of collecting personal data:

- We always ask for your explicit consent for all personal data you need to submit.
- We do not collect your personal data unless you initiate activity on our websites that requires data collection for the purpose of providing services.
- We use the data you have submitted to identify you, verify data you have submitted, provide you with information in hardcopy or electronic form in order to make our services available to you.

Your rights

- Right of access and correction - you are entitled to request information what personal data of yours we store and make correction to data that you consider incomplete or inaccurate. You are also entitled to request the data that you consider incomplete or inaccurate be supplemented or updated.
- Right to delete - you are entitled to request deletion of your data under certain conditions.
- Right to restrict processing – you are entitled, under certain conditions, to request that we restrict the processing of your data.
- Right to object to processing - you are entitled, under certain conditions, to object to the processing of your personal data.
- Right to transfer data - you are entitled, under certain conditions, to ask us to transfer the data we have collected about you to another organization or to deliver it to you.
- Right not to be subject to a decision based solely on automatic processing - this right extends to the right not to be profiled on the basis of which legal conclusions related to you can be made unless there is a legal ground for that with adequate provision of your rights, freedoms and personal interests.

14. Amendments to the Privacy Policy

If amendments are made to this Privacy Policy, users of our services will be notified by publication on our websites and / or by sending an e-mail notifying of a new version availability.

With the publication of the new version of this document, its previous version ceases to be valid. The previous version will remain available for your reminder at <https://www.kibstrust.com/mk-MK/Home/Dokumenti>.

15. Contact information

If you want to contact us, complain, or get information of what we store for you, we offer you the following options:

- Send us a letter to the address: Blvd. Kuzman Josifovski Pitu 1, 1000 Skopje.
- Call the phone number: +389 2 3297 401
- Send an e-mail to: ozlp@kibstrust.com.

We will respond to any request related to the protection of personal data within a legal deadline.

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