



GlobalCerts Products and Services GDPR Statement

April 20, 2018

The purpose of this document is to provide our customers who may fall under the General Data Protection Regulation (GDPR) of the EU with information regarding how our products and services address the various GDPR provisions. It briefly outlines how GlobalCerts will coordinate with you to address privacy requests in a timely manner compliant with GDPR statutes.

GlobalCerts, LLC may process personal data on your behalf, according to your instructions, and in accordance with the GDPR requirements directly applicable to GlobalCerts' products and services. The subject matter of the processing is the performance of the services to you pursuant to your customer agreement. GlobalCerts may process the personal data for the following purposes: (1) processing in accordance with your agreement; (2) processing initiated by your end users in their use of the products and services; and (3) processing to comply with other documented reasonable instructions provided by you where such instructions are consistent with the terms of our agreement.

The duration of this processing will be for the duration of our support and services agreement, except where otherwise required by applicable law, as required by a legal obligation or for GlobalCerts to protect its rights or those of a third party, or as required for GlobalCerts to continue processing personal data based on a legitimate interest.

The types of personal data that GlobalCerts processes are determined and controlled by you, in your sole discretion, and may include, but are not limited to, IP address, email address, and passphrase.

GlobalCerts shall process the personal data only on documented instructions from you and in accordance with the specifications above, unless required to do otherwise by applicable law to which GlobalCerts is subject; in such a case, GlobalCerts shall inform you of that legal requirement before processing personal data, unless that law prohibits such disclosure on important grounds of public interest.

GlobalCerts shall, to the extent legally permitted, promptly notify you if we receive a request from a data subject to exercise the data subject's right of access, right to rectification, restriction of processing, erasure ("right to be forgotten"), data portability, objection to processing, or right not to be subject to automated individual decision making ("Data Subject Request"). GlobalCerts shall assist you in your obligation to respond to a Data Subject Request. In addition, to the extent you, in your use of our services, do not have the ability to address a Data Subject Request, GlobalCerts shall upon your written request provide commercially reasonable efforts to assist you in responding to such Data Subject Request, to the extent GlobalCerts is legally permitted to do so and the response to such Data Subject

Request is required under applicable laws. To the extent legally permitted, you shall be responsible for any additional costs arising from GlobalCerts' provision of such assistance. Please note that GlobalCerts may not be able to fulfill a Data Subject Request where to do so would violate laws applicable to GlobalCerts, would interfere with GlobalCerts' ability to meet legal obligations or protect its rights or those of a third party, or would prevent GlobalCerts from continuing to process personal data where it has a legitimate interest in doing so.

Upon your written request, GlobalCerts shall provide you with reasonable cooperation and assistance as needed and appropriate to fulfil your obligations under the GDPR to carry out a data protection impact assessment related to your use of our products and services, to the extent you do not otherwise have access to the relevant information, and to the extent such information is available to GlobalCerts. GlobalCerts shall provide reasonable assistance to you in the cooperation or prior consultation with the Supervisory Authority in the performance of its tasks relating the data protection impact assessment, to the extent required under the GDPR.