

TURINGSIGN Privacy Policy

This **Privacy Policy** by TuringSign Global SA, a company incorporated in Switzerland under the laws of the General Data Protection Regulation (“TuringSign or “we”) apply to any entity or person (Collectively, “You, you, User, Users, Subscriber, or Subscribers”) who access our websites and browser-based portals (“Website, Websites”). We are committed to protecting the privacy of our Subscribers, and this Privacy Policy documents our practices of collecting, using, storing and safeguarding Subscribers’ personal information. TuringSign considers personal information as information used to identify our Subscribers that is in our possession. Unless explicitly specified otherwise, this Privacy Policy applies to all sites operated by TuringSign. TuringSign is responsible for the collection, use, disclosure, retention and protection of Subscribers’ personal information in accordance with our standards, policy and applicable laws. The definition of terms not defined in this Privacy Policy are defined in Terms and Conditions at https://turingsign.com/wp-content/uploads/2023/05/TS-Terms-and-Conditions_May-22.pdf

We recommend that you read this Privacy Policy carefully. By using our Websites, you acknowledge that you have read and agreed to this Privacy Policy. If you do not agree with this Privacy Policy, please do not use the Websites.

We may periodically revise this Privacy Policy and any changes will be posted on our Websites. Your continued use of our Websites after any changes will constitute your acceptance of the revised Privacy Policy. For any inquiries about data protection, you can contact us at: sslsupport@turingsign.com.

WHAT WE COLLECT

TuringSign collects the data necessary for the provision of our products and services. In most instances, Subscribers provide their information through direct interactions with TuringSign, such as creating an Account on our website, purchasing our Products, subscribing to TuringSign services, and sending a request to TuringSign. Agreeing to the collection of personal information is necessary in purchasing certain products or services (ex. for a OV or EV Certificate validation process). Therefore, disagreeing to provide personal information means that Subscribers will not be eligible for purchasing some products or services.

Personal data that TuringSign collects and stores including but not limited to:

- Name
- E-mail address
- Company/Organization name
- Locality

- State/Province
- Country
- Government issued ID document number (e.g. passport, driving license)
- Phone number
- Billing information (billing name and address, credit card number)
- Other information that is necessary for us to provide you with TuringSign products and services
- Information you provided through email, web form, chat function

Certain information submitted will be displayed in the Certificate and will be publicly available as a result.

Personal data that is not included in Certificates but that may be requested as part of the Certificate issuance process (e.g. for vetting the individual's authority and ownership of the organization domains). This data can include but not limited to Company registration documentations.

In addition, we also collect information relating to the access, usage, and performance of our Websites when you visit them, which is then stored in electronic records called logs. These logs may record online identifiers, IP addresses, the name and version of your operating system and browser, referring pages, the pages visited, dates and times of access, and information regarding errors and functionality.

To enhance your experience, we may also use cookies and similar technologies, and allow certain third parties to use cookies and similar technologies, to collect information related to your visit. This information typically includes your IP address, online identifier, the identity of your Internet Service Provider, the name and version of your operating system and browser, information about your device type, the date and time of your visit, the pages you visit, the search terms you enter, and your preferences. For more information, refer to the Cookies Policy section below.

We advise users to periodically review our Privacy Policy and contact us with any questions about the processing of your data.

DATA COLLECTED FROM AND THROUGH THIRD PARTIES

TuringSign partners with resellers to offer end-users products and services for purchase. By providing your information directly to these resellers, you acknowledge that your information is subject to the privacy policies and practices of those resellers, not this Privacy Policy. Thus, TuringSign is not liable for any misuse of your information by the resellers. It is your responsibility to review and understand the policies and practices of these resellers before sharing your information.

To provide you with products and services through a reseller, the specific reseller must share your information with TuringSign. TuringSign will collect and use your information in accordance with this Privacy Policy, and will take all necessary measures to protect it.

Furthermore, for TuringSign to validate certain certificates in accordance with industry standards, it may need to supplement the information provided by you with information obtained from third-party sources. This cross-checking process is essential to the service that TuringSign provides. However, TuringSign does not have any control over these third-party resources for certificate validation, (i.e. for OV and EV). Please refer to the CPS and the EV Guidelines for more information on certificate types and third-party resources for certificate validation.

COOKIES POLICIES

A cookie is a piece of data that websites send to your computer or other web-based devices to uniquely identify your browser or to store information or settings on your browser based on your use. Cookies allow us to identify you when you return to the TuringSign Website, providing you with a streamlined and customized experience. TuringSign may employ the use of cookies to analyze trends, administer our Websites, products or services, gather demographic information or to measure the success of advertising and affiliate network memberships. TuringSign's resellers and webhosts may also use cookies, although TuringSign does not exercise any access or control of such partners' cookies. You can always control the use of cookies, but if you choose to disable all cookies, it may limit your use of certain functions or features on our Websites, products or services.

PURPOSE OF DATA COLLECTION

We collect and process personal data for various purposes including setting up and maintaining your TuringSign user account, verifying your information, processing online transactions, providing access to our websites, monitoring and improving our website content and functionality, preventing fraudulent activity, and communicating with you. We may also use your personal data for internal research and development, advertising and marketing purposes, and to ensure that our website content is presented in the most effective manner for you and your device.

Please note that we may aggregate or de-identify personal data collected via our websites for any purpose, at our discretion. This may include using such information to audit, measure, and understand the effectiveness of advertising we serve to you and others. We take your privacy seriously and will always process your personal data in accordance with applicable laws and regulations.

DISCLOSURE AND SHARING OF DATA COLLECTED

Please note that we may share and disclose your personal data in certain circumstances, including the following:

- We may disclose or transfer your personal data to TuringSign subsidiaries or affiliates.
- We may disclose or transfer your personal data as part of a potential or actual TuringSign merger, acquisition, sale of a portion of TuringSign or our assets or as part of a bankruptcy proceeding or a business reorganization.
- We may share your personal data with third parties who provide services to us. Examples of third-party service providers (also known as “data processors”) include payment processing providers, credit reference agencies, website analytics and advertising companies, and service providers who operate, maintain and support our websites, products and services.
- We may disclose personal data to protect, enforce or defend our rights or those of others, or where we believe the disclosure is required by law.
- We may disclose personal data to prevent or investigate a possible crime, such as fraud or identity theft, or to protect the security of our Websites, products and services.

Please note that we may also share aggregated or de-identified information with third parties, at our discretion.

DIGITAL ADVERTISING AND ANALYTICS

As part of our commitment to providing you with the best possible service, we may work with third parties that collect data using cookies and similar technologies about your use of our Websites and other sites or apps over time for non-advertising purposes. We may use Google Analytics and other third-party services to improve the performance of our Websites and for analytics or marketing purposes. For more information about how Google Analytics collects and uses data when you use our website, please visit www.google.com/policies/privacy/partners. To opt-out of Google Analytics, you can visit tools.google.com/dlpage/gaoptout.

Please be assured that we only share your personal data in certain lawful circumstances, such as with subsidiaries or affiliates, third-party service providers, or to protect against possible crimes. Your personal data will always be processed in accordance with applicable laws and regulations. If you would like to opt-out of our targeted advertising or analytics cookies, please visit our Cookie Policy and click on the “Cookie Settings” button. From there, you have the ability to adjust your cookie settings so that only strictly necessary cookies are activated.

RETENTION PERIOD

We are committed to retaining personal data only for as long as it is necessary for the specific purpose for which it was collected. For instance, if we require your personal data to grant you access to our websites, online products, or services, we will retain your personal data for the duration in which we provide you with that access, unless we are legally obligated to dispose of it earlier or retain it for a longer period.

Additionally, we will retain your personal data as necessary to fulfill our legal obligations as well as the third-party requirements, resolve disputes, pursue legitimate business interests, conduct audits, and safeguard or enforce our legal rights. We adhere to all applicable legal requirements and regulations relating to the retention of personal data and ensure that any personal data we retain is adequately protected.

PROTECTING YOUR DATA

We are committed to using reasonable administrative, technical, and physical security measures to protect your personal data from loss, misuse, unauthorized access, disclosure, alteration, and destruction. These security measures will be designed to provide a level of security appropriate to the risk of processing your personal data.

Password Protection

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Websites, you agree to keep this password confidential. You acknowledge that you are solely responsible for maintaining the confidentiality of your password and must not share it with anyone.

Transmission of Personal Data

We acknowledge that the transmission of information via the internet is not completely secure. We will do our best to protect your personal data, but we cannot guarantee the security of your data transmitted to our Websites or stored in our databases. Therefore, your transmissions of personal data are at your own risk.

Retention of Personal Data

We commit to retaining your personal data only for the specific purpose for which it was collected and for as long as necessary to fulfill legal obligations, resolve disputes, pursue legitimate business interests, conduct audits, and safeguard or enforce legal rights while ensuring that the data is adequately protected.

INTERNATIONAL DATA TRANSFER

TuringSign may transfer and store the personal data we collect from you on our servers or third-party servers located in a different location than where it was collected. The data may also be processed by our staff or third-party service providers who work in a location different from where the data was collected. Any transfer of your personal data will only be done in accordance with the law. We are aware of the importance of protecting personal data when it's transferred across borders, and we take appropriate measures to ensure compliance with applicable privacy and data protection laws.

YOUR RIGHTS AND REQUESTS

Certain states' and countries' data protection laws provide their residents with rights regarding businesses' use of their personal data. These rights include the right to know, access, correct, transfer, restrict the processing of (including specific restrictions that may pertain to the sale or sharing of personal information, the processing of sensitive information, and more), and delete personal data.

Regardless of your state or country of residence, you can contact TuringSign at any time to request about how we process your personal data, disclose the categories of personal data that we have collected about you, disclose the categories of sources from which we have collected your personal data, disclose our purpose(s) for collection and disclose the categories of personal data

about you that we have disclosed to third parties for business purposes and the categories of recipients of such personal data. You may also request to delete all or some of your personal data, change, update, or correct your personal data, and disclose the specific pieces of personal data that we have collected about you.

We will consider and respond to your requests promptly, and otherwise in accordance with all applicable laws.

To make any of the above requests, you can contact us via email sslsupport@turingsign.com.

Please note that TuringSign may not be able to respond to your request if we cannot verify your identity, or your agent's identity and authority to make the request, and confirm the personal data relates to you.

EXTERNAL WEBSITE

Our Websites may include links to websites owned and operated by third parties. We hereby disclaim any responsibility for the content, information, or privacy practices of these websites. The inclusion of such links does not imply our endorsement of the websites, their content, or their owners. Please note that this Privacy Policy does not apply to third-party websites. You should review the privacy policies of these websites before providing any personal information to them. By accessing these third-party websites, you acknowledge that we are not responsible for their practices and that you do so at your own risk.

FOR CALIFORNIA RESIDENTS: CCPA PRIVACY NOTICE

Under the California Consumer Privacy Act (CCPA), California residents have specific rights regarding their personal information. This section outlines your CCPA rights and explains how to exercise them.

Right to Know/Access and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Upon receiving and confirming your verifiable consumer request, we will provide you with the following information for each category of personal information collected:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.

- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we have collected from you and retained, subject to certain exceptions. Upon receiving and confirming your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies. Deletion will be completed by permanently erasing your personal information on our systems (with the exception of backup or archival systems) or by de-identifying or aggregating your personal information. In our response to your deletion request, we will specify which method we used to comply with your request.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.

- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

If we deny your deletion request, we will provide you with a basis for such denial.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by email sslsupport@turingsign.com.

We will respond to your request within 45 days of receiving it. We may need to verify your identity before fulfilling your request, and we will notify you if this is the case. You may designate an authorized agent to make a request on your behalf, but we will require a signed authorization from you and verify the authorized agent's identity and authority. We will not discriminate against you for exercising any of your CCPA rights.

The TuringSign will not charge a fee to process or respond to a verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If the TuringSign determines that the request warrants a fee, it will inform the user of the reason and provide a cost estimate before completing the request. The TuringSign will not discriminate against the user for exercising their CCPA rights.

The user may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must provide sufficient information to verify the user's identity and request.