

PRIVACY POLICY

I. Controller Identification and Processing Activities

CVTrust, is registered in the Belgian Companies Register under number 0819.649.109 and its registered office is situated 231, avenue Louise (Silversquare) at 1050 Brussels (Belgium). If you have any questions about the following activities, you can further contact support@cvtrust.com.

CVTrust has nominated a Data Protection Officer, who can be reached at DPO@cvtrust.com.

The CVTrust platforms allows for the granting and management of electronic documents and credentials.

- CVTrust acts as a processor for the granting (or cancellation) of electronic documents, on behalf of various organizations/granting authorities who are competent for endowing the original credential (CVTrust clients). For more information on CVTrust services please consult the Client Terms.
- CVTrust acts as a controller for the management of the electronic documents and credentials over time, in particular for their storage and making available to third parties. This is part of the CVTrust services that the end-user agrees to when creating a profile. For more information on CVTrust services please consult the End-User Terms.

CVTrust will be processing end-user personal data, such as name, e-mail address, education, or any other identification data necessary to ensure the identity and credentials of individuals. This information is provided by either the end-user themselves or the institution/organization granting the credentials.

For end-users, their name, e-mail address, and credential itself related data are required to perform the CVTrust services. Any other personal data is provided and required by the granting authority (the CVTrust client) to grant the credential. As an end-user you can delete or change some elements of personal data through the CVTrust profile, but not manipulate electronic documents which have been issued by a granting authority.

CVTrust may also process personal data related to client representatives (i.e., representatives working for granting authorities/clients), their name, professional contact information, and other related data necessary to authenticate the client (granting authority).

CVTrust also processes cookie data related to all visitors to the CVTrust website, please consult the cookie policy for more information.

II. Purposes, Legal Basis, and Storage

For End-Users:

<i>Purpose & activity</i>	<i>Legal basis</i>	<i>Storage Duration</i>
<p>A. CVTrust Services Personal data is used to perform CVTrust services under the end-user terms, including:</p> <ul style="list-style-type: none"> -Store and certify the electronic document. -Provide an end-user account to access and use the CVTrust platform and features to manage the electronic documents. -maintenance of the platform. <p>Consult the End-User Terms for further description of the services and processing activities.</p>	<p>The contract the end-user is a party to (the CVTrust End-User Terms) for the performance of CVTrust services, which are accepted by the end-user when making an account.</p>	<p>Personal data will be processed and stored as long as an end-user keeps an active profile and 50 years as from their last date of connection/use of the account. Once a CVTrust profile has been terminated, the personal data shall be deleted within 5 days.</p> <p>Any personal data that may give rise to legal effects may be archived for evidentiary purposes for a period equal to the statute of limitation (most often 10 years) or any legally prescribed retention period.</p>
<p>B. Ad-hoc requests To respond to and manage End-User ad hoc requests, assistance, merging of Accounts, etc.</p>	<p>The performance of a contract the End User is a party to (the End-User Terms or the specific request made by the End-User) for the performance of CVTrust Services and all accessory services</p>	<p>Persona data will be processed and stored as long as necessary to perform the specific request.</p>
<p>C. Promotional Activities Personal data is used to send CVTrust promotional materials regarding service update, feature additions, events, etc.</p>	<p>To the extent applicable, end-user Consent</p>	<p>So long as consent has not been withdrawn.</p>
<p>D. Security and fraud detection Personal data is used to manage and prevent security risks and service integrity, in particular fraud detection, monitoring of suspicious activity, and IT security. CVTrust may keep access logs, store back-ups, or carry-out other IT security activities which may involve the</p>	<p>CVTrust’s legitimate interest to assess service risk and ensure security and service integrity, as well as the legal obligation user GDPR and other legislation to ensure IT security.</p>	<p>As long as necessary to ensure a high level of security, data back-up, and non-reputability of actions.</p> <p>Any personal data that may give rise to legal effects may be archived for evidentiary purposes for a period equal to the statute of limitation</p>

<p>processing of personal data to ensure a high level of IT Security and prevent fraud/impersonation.</p>		<p>(most often 10 years) or any legally prescribed retention period.</p>
<p>E. Usage statistics To evaluate, update, and manage the company’s value and Service offering/ technology.</p> <p>The fact that an end-user accepted the Electronic Document is tabulated to provide conversion statistics.</p> <p>Data about consultation and the different use of the Electronic Document is also collected but immediately anonymized.</p> <p>Personal data may be anonymized for the compilation of long-term statistics</p>	<p>CVTrust’s legitimate interest to provide and improve its services, maintain service levels, and by virtue of the Client’s (granting authority’s) rights/interest to oversee the granting of its credentials.</p>	<p>The conversion statistic is a fact and is registered so long as the client and end-user accounts exist;</p> <p>Personal data will be processed and stored in order to fulfill any legal retention periods Supplier is subject to or for the duration of the statute of limitations. Any other usage statistics are immediately anonymized.</p>
<p>F. Cookies Personal data is used for the website to function and provide social media plug-ins.</p>	<p>Consent, to the extent accepted when visiting the CVTrust website.</p>	<p>Session cookies: for the duration of the session 1st party persistent cookies: 6 months 3rd party persistent cookies: CVTrust does not control the duration.</p>

For Client Representatives:

<i>Purpose & Activities</i>	<i>Legal basis</i>	
<p>A. CVTrust Services/Platform Management Personal data is used to provide CVTrust services as defined in the Client Terms to:</p> <ul style="list-style-type: none"> -To authenticate the client’s/ granting authority’s identity in order to certify the accuracy of electronic credentials. -Create Client user account to access and use CVTrust platform. 	<p>The legitimate interest of CVTrust and the client to enter into and perform a service contract and to provide CVTrust services to the benefit of end-user.</p> <p>This is also based on the performance of the representative’s employment or service contract which binds them to and grants them the powers of representation in relation to the client/granting authority.</p>	<p>Personal data will be processed and stored as long as a client representative represents an entity that uses CVTrust Services. Once a representative no longer represents a CVTrust Client, the personal data shall be deleted within 1 year, except any personal data that may give rise to legal effects may be archived for evidentiary purposes for a period equal to the statute of limitation (most often 10 years) or any legally prescribed retention period.</p>

<p>B. Client management Personal data is used to manage clientele, administer client contracts and administrative requests, invoicing, and payment.</p>	<p>The legitimate interest of CVTrust and the client to enter into and perform a service contract and to provide CVTrust services to the benefit of end-user.</p>	<p>Personal data will be processed and stored as long as a client representative represents an entity that uses CVTrust Services. Once a representative no longer represents a CVTrust Client, the personal data shall be deleted within 1 year, except any personal data that may give rise to legal effects may be archived for evidentiary purposes for a period equal to the statute of limitation (most often 10 years) or any legally prescribed retention period.</p>
<p>C. Customer support activities Personal data is used to respond to any client representative's requests regarding the use of the CVTrust platform and services.</p>	<p>The legitimate interest of CVTrust and the client to enter into and perform a service contract and to provide CVTrust services to the benefit of end-user.</p>	<p>Personal data will be processed and stored as long as a client representative represents an entity that uses CVTrust Services. Once a representative no longer represents a CVTrust Client, the personal data shall be deleted within 1 year, except any personal data that may give rise to legal effects may be archived for evidentiary purposes for a period equal to the statute of limitation (most often 10 years) or any legally prescribed retention period.</p>
<p>D. Promotional Activities Personal data is used to, to the extent applicable, send CVTrust promotional materials regarding service update, feature additions, events, etc.</p>	<p>Consent, to the extent the representative has not opted out of receiving such materials.</p>	<p>So long as consent has not been withdrawn.</p>
<p>E. Security Personal data is used to manage and prevent any risks CVTrust faces, in particular IT security. CVTrust may keep access logs, store back-ups, or carry-out other IT security activities which may involve the processing of personal data to ensure a high level of IT Security and prevent fraud/impersonation.</p>	<p>CVTrust's legitimate interest to assess its risk and ensure IT security, as well as the legal obligation user GDPR and other legislation to ensure IT security.</p>	<p>As long as necessary to ensure a high level of security, data back-up, and non-reputability of actions.</p> <p>Any personal data that may give rise to legal effects may be archived for evidentiary purposes for a period equal to the statute of limitation (most often 10 years) or any legally prescribed retention period.</p>
<p>F. Cookies</p>	<p>Consent, to the extent accepted when visiting the CVTrust website.</p>	<p>Session cookies: for the duration of the session 1st party persistent cookies: 6 months</p>

Personal data is used for the website to function and provide social media plug-ins.		3 rd party persistent cookies: CVTrust does not control the duration
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III. Recipients

Your personal data may be shared with other CVTrust affiliates or with any agents acting on behalf of CVTrust, as well as the entity having issued the electronic certificate. We use different service providers for web hosting services, time-stamping, and other accessory services necessary to support CVTrust services (for more information on sub-processors consult the Client Terms). We will use best efforts to guarantee that these recipients shall process your personal data in compliance with the applicable legislation.

Should personal data be transferred to any recipients outside the European Economic Area, CVTrust will use best efforts to ensure that the personal data is adequately safeguarded through the measures or exceptions provided for by the GDPR. For more information on such measures contact support@cvtrust.com or DPO@cvtrust.com.

IV. Data Subject Rights

As a data subject you have the following rights:

- To request access to your personal data;
- To obtain the rectification of any inaccurate personal data;
- To obtain the erasure of personal data, under the applicable legal conditions;
- To limit the processing activities to which the personal data is subject, under the applicable legal conditions;
- To receive your personal data in a structured, commonly used and machine-readable format, and have the personal data transmitted to another controller, under the applicable legal conditions;
- If processing is based on consent, to withdraw consent at any time (although this does not impact the lawfulness of past processing activities);
- To lodge a complaint with the national supervisory authority (<http://www.dataprotectionauthority.be/>)

For more information on data protection rights, please consult: <https://autoriteprotectiondonnees.be/citoyen/vie-privee/quels-sont-mes-droits->

For any questions regarding the use of your personal data you can write to DPO@CVTrust.com.