### **Privacy Policy for Business Certificates**

This privacy policy outlines the information collection and usage practices employed by Commfides Norge AS (org. no.: 988 31 2495, hereinafter referred to as Commfides) for issuing a Business Certificate.

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## **Your Rights**

- Right to be informed: This privacy policy describes how Commfides Norge AS
  processes, stores, and (if applicable) shares your personal data. You will be
  notified of changes to this privacy policy or if anything affects your data.
- Right to access: Information we hold about you can be provided upon request.
- **Right to rectification**: If you believe the information we have about you is incorrect, you can request correction.
- **Right to erasure**: You can request the deletion of your data, with some limitations (see "Deletion, limited processing").
- Right to restrict processing: You can request restricted processing of your data.

- **Right to data portability**: You can request to have your data exported (see "Data Portability").
- Right to object: See "Contact us, more information".
- Rights related to automated decision-making, including profiling: Commfides
   Norge AS does not engage in automated decision-making.

# Information Collected by Commfides Norge AS: How and Why

To validate and issue a business certificate, Commfides must collect some personally identifiable information. Certain data is collected during the ordering process, while other data is collected when the certificate is issued.

Establishing and managing your customer relationship with Commfides is subject to the Norwegian Personal Data Act (personopplysningsloven) and the Money Laundering Act (hvitvaskingsloven). This requires you to provide valid identification, which we are obligated to store and verify. Additionally, we must retain all relevant information related to the certificate (personal data and usage) for at least 10 years after the certificate is revoked or expired, as stipulated by the Norwegian Act on Electronic Trust Services.

The information Commfides collects depends on your role (recipient, administrator, and/or signatory). The following data is collected, categorized by role:

- **Personal Identification Number (Recipient, Signatory)**: Used to validate your identity against the Norwegian National Population Register and as a unique identifier in our certificate management system.
- First and Last Name (Recipient, Signatory, Administrator): Together with your identification number, this is used to validate your identity against the Norwegian National Population Register and the Brønnøysund Register Centre.
- Email Address (Recipient, Signatory, Administrator): Used for updates regarding order status and notifications related to the business certificate.
- Mobile Phone Number (Recipient, Signatory, Administrator): Used for updates regarding order status and notifications related to the business certificate.
- Copy of Identification (Recipient, Signatory): Collected when issuing the business certificate using a digital form on Commfides' website.
- Additional Data (Recipient, Signatory):
  - From the Norwegian National Population Register (DSF): With your consent, we retrieve your full name, registered residential address, and personal status (e.g., resident, emigrated).

## **Information Storage and Security**

All your data is stored at Commfides Norge AS's data center in Lysaker, Norway. Commfides Norge AS is an officially approved certificate issuer and is ISO27001-certified.

### **Information Sharing**

Commfides is bound by confidentiality and does not share your personal data or usage information.

 If the business certificate is delivered on physical media (standard delivery is digital), it is sent via Posten. Commfides uses the Consignor Portal (www.consignor.com) for managing package shipments.

Data shared with Posten and Consignor includes:

- Name
- Address
- Email and mobile phone number (for delivery notifications, e.g., pick-up notices).
- Upon request, we may also send you SMS notifications using the platform Sveve AS, which requires your mobile phone number.
- **Sharing with Authorities**: In cases where it is legally mandated, we are required to share data with authorities.
- Sharing with the Business Entity: Administrators or signatories can access information about who has or had access to the business certificate. This includes name, email, mobile phone number, and role.
- Sharing with Resellers: If the business certificate is ordered via a thirdparty/reseller, the ordering party will have access to the recipient and signatory's name and email, as this information is provided during the order process by the reseller.

#### **Cookies and Analytics**

To improve our website (<u>www.commfides.com</u>), we use Google Analytics to track statistics on visits and activity. You can disable this by clicking the banner at the bottom of the site or globally using Google's Opt-Out add-on.

Other cookies are used to remember your preferences on the website, such as language selection.

### **Accessing Your Information**

If you wish to access your personal data, please send an email to <a href="mailto:servicedesk@commfides.com">servicedesk@commfides.com</a>. Note that we will validate your identity and request to ensure you are the individual entitled to the data.

## **Email and Direct Marketing**

Your email will not be used for marketing purposes, except for alerts regarding expiration or other important information about your ID.

### **Deletion, Limited Processing**

You can request the deletion of your personal data. However, as stipulated by the Norwegian Act on Electronic Trust Services, we are required to retain personal data related to the certificate (e.g., order data, transaction data).

### **Data Portability**

You have the right to receive your personal data and store it on a private device for further personal use. To request this, please email <a href="mailto:servicedesk@commfides.com">servicedesk@commfides.com</a>. Note that this process may take up to one month.

#### **Protection Guarantees**

We use physical, logical, and administrative measures to prevent unauthorized access to your data. If we detect a breach affecting your personal data, we will investigate and inform you within 72 hours of becoming aware of it, as per the Personal Data Act/GDPR.

## **Changes to the Privacy Policy**

We reserve the right to amend this privacy policy to include additional features, comply with legal requirements, or enhance user protection. Please check this page for updates.

If we make any changes to this privacy policy, you will be notified via email when the changes take effect.

# **Contact Us, More Information**

If you have questions, suggestions, or other comments about this privacy policy, please contact us at <a href="mailto:servicedesk@commfides.com">servicedesk@commfides.com</a>. We will respond within seven working days.