

JULY 2023

GUARDTIME PRIVACY POLICY

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1. Introduction

- A. This privacy policy sets out why and how GuardTime OÜ, registry code 11313216, address A.H. Tammsaare tee 60, Tallinn 11316 (“**Guardtime**”, “**We**” or “**Us**”) collects, uses, discloses and protects personal information of its users and partners, website visitors and job applicants (“**You**”) and provides information on Your rights regarding these activities. In such processing activities, We act as the data controller as regards Your personal information.
- B. We are committed to ensuring that Your personal information is protected. If We ask You to provide certain information by which You can be identified, it will only be used in accordance with this privacy policy and the EU privacy regulations, including the EU General Data Protection Regulation (**GDPR**).
- C. We may change this policy by updating this page. Notification about substantial changes will be sent depending on the type of data subject.

2. Storage and Security

- A. We are committed to ensuring that the information You provide is secure. In order to prevent unauthorized access or disclosure, We have put in place suitable physical, electronic and organizational procedures to safeguard and secure the information and protect it from misuse, interference, loss and unauthorized access, modification and disclosure.
- B. We will retain Your personal information only as long as this is necessary for attaining the purposes for which the personal information is processed. The retention periods might arise from a legal obligation stipulates that We must do so or from an agreement concluded with You. For example, We are obliged to retain personal information related to: accounting for 7 years, evidence regarding identification for 10 years. In case of job applicants, We normally keep application information for 12

months after the application submission deadline.

3. Your Rights

- A. You may exercise Your rights arising from applicable data protection rules. Your rights include, to the extent they are technically and legally possible, the following:
- a. right to access personal information processed by Us and request copies of Your personal information;
 - b. request the rectification of Your personal information, if You believe that the personal information We hold on You is inaccurate, out of data, incomplete, irrelevant or misleading;
 - c. right to request erasure of personal information;
 - d. right to request restriction of processing;
 - e. right to data portability;
 - f. right to object to data processing;
 - g. right to lodge a complaint to Your local EU data protection authority, Estonian Data Protection Inspectorate or the court.
- B. If the legal ground for processing Your personal information is Your consent, You have the right to withdraw Your consent at any time. However, please note that the withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.
- C. If the legal grounds for processing Your data are Our legitimate interests or those of a 3rd party, You may object to the processing of Your personal data on the basis of legitimate interests.
- D. If You would like to exercise any of the above-mentioned rights, please contact Us at info@guardtime.com. We will respond to any request within a reasonable time and will take the requested measures as quickly

as possible.

4. Data Collection and Usage

- A. This section provides details of which data is collected and how it is used per each data subject.

4.1. Users and Partners

- A. This concerns individuals who represent organizations that are past, current or potential future:
 - a. users of Guardtime services;
 - b. partners for developing services or doing other types of joint business with Guardtime.
- B. The categories above include individuals who contact Guardtime via email, guardtime.com website or other means of communication with the aim to act as a user or partner.

4.1.1. Data Collected

- A. We may ask You to provide the following information:
 - a. full name;
 - b. job title;
 - c. contact information, including email and physical address;
 - d. other information relevant to fulfill the contracts, conduct customer surveys and/or promotions.
- B. We do not collect any special categories of personal information.

4.1.2. Use of Personal Information

- A. We use the personal information for the following purposes:
- a. to fulfill our contractual and legal obligations such as notifying You about changes in our policies, technical updates to the provided services and products and security risks;
 - b. to better understand Your needs, enabling Us to improve Our products and services;
 - c. for internal record keeping;
 - d. for direct marketing activities, such as promotional emails about new products, special offers or other information which We think You may find interesting;
 - e. to contact You (by telephone, email, fax or mail) for market research.

4.1.3. Legal Basis for Processing

- A. We process Your personal information on the following legal grounds:
- a. Your consent (e.g., when We process personal information for direct marketing or research purposes);
 - b. performance of a contract or taking steps at Your request to enter into a contract (e.g., when We are providing services to You based on our Terms of Service or Service Subscription Agreement);
 - c. fulfilling Our legal obligations (e.g., accounting obligations, requests from state authorities);
 - d. Our legitimate interest that in such specific cases overrides Your interests or fundamental rights and freedoms (e.g., when processing is necessary to protect Our legal rights or when it is necessary for Our internal record keeping purposes).

4.1.4. Disclosure of Personal Information

- A. We may disclose personal information to:
- a. courts, regulatory authorities, and law enforcement officers as required by law;
 - b. Our affiliates;
 - c. Our lawyers or debt collectors in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights; and
 - d. 3rd parties, including agents or subcontractors, who assist Us in providing information, products, services or direct marketing to You. If some of these recipients can be considered data processors, We will ensure their reliability and will conclude appropriate data processing agreements with them.
- B. Note that the recipients may include parties located outside of the European Union. However, the personal information is only transferred to 3rd countries if the European Commission has decided that the 3rd country ensures an adequate level of protection or if additional security measures such as binding corporate rules, standard contractual clauses adopted by the European Commission or other appropriate safeguards are applied.
- C. We disclose personal data to 3rd parties only when it is necessary, and We have appropriate legal grounds for such disclosure.
- D. If there is a change of control of Our business or a sale or transfer of business assets, We reserve the right to transfer to the extent permissible at law Our user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser. We would seek to only disclose information in good faith and where We have sought to maintain confidentiality.

4.2. Website Visitors

4.2.1. Data Collected

- A. As with most online businesses, We may log information about Your access and use of the guardtime.com website, including through the use of Internet cookies, Your communications with Our site, the type of browser You are using, the type of operating system You are using and the domain name of Your Internet service provider.
- B. We may use forms on Our website to collect Your personal information for providing tryout access to Our services, conduct market research or other similar purposes which are then made clear on the specific page. In those cases We apply the same principles as stated above for users and partners concerning the type of personal information collected and its use, unless explicitly stated otherwise on the specific page. The collection of such information is not implicit, You would have to explicitly enter and submit it.

4.2.2. Cookies and Web Beacons

- A. Cookies are text files placed in Your computer's browser to store certain information. Web beacons or clear.gifs are small pieces of code placed on a web page to monitor the behavior and collect data about the visitors viewing a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page. Cookies or web beacons themselves do not contain or provide any personally identifiable information; however, if You provide personally identifiable information on the website, it may be linked to the data stored in the cookie.
- B. We use cookies for:
 - a. making the website functionally working, easy to use and remember Your preferences;
 - b. analyze website usage such as which type of articles are the most

interesting for the users;

c. advertising, measuring and improving Our marketing performance.

C. **You agree to the usage of all cookies and web beacons by clicking Accept on the cookie banner.** You can reset Your cookie settings by going to <https://guardtime.com/reset-cookies>.

D. However, Internet browsers provide You with full and fine-grained control regarding which cookies You accept from each site and removal of existing cookies if necessary. You have the right to remove and block all cookies from Our website; however, removing certain cookies may make Our website unusable or cause the loss of Your stored preferences.

4.2.3. Links to Other Websites

A. Our website may contain links to other websites of interest. We do not have any control over those websites. Therefore, We are not responsible for or liable for the protection and privacy of any information, which You provide or which is collected whilst visiting such websites. Note that 3rd party websites are not governed by this Privacy Policy. If You would like to receive information on how the 3rd party websites process Your personal information, We recommend You review their privacy policy or contact the administrator of the website.

4.3. Job Applicants

4.3.1. Data Collected

- A. If You apply for a job at Guardtime, we may ask You to provide the following information:
- a. full name and personal identification code;
 - b. contact information, including email, telephone number and physical address;
 - c. CV (containing information that You choose to expose to us);

- d. other personal information that you have voluntarily decided to share with Guardtime as a part of the recruitment process (application letter, web links to other databases, e.g., LinkedIn profile, CV in web-based platform, information about salary expectations).
- B. We do not collect any special categories of personal information. However, We are under a legal obligation not to employ people with active criminal record when providing trust services¹. In this case, We inform You in the job application that active criminal record information is required. We expect that You provide this information to Us together with the application for meeting this requirement.
- C. We delete the collected information 12 months after the application submission deadline or during one working week after receiving a written request from the applicant.
- D. We may ask You if We can keep Your CV for future job vacancies. In this case, We inquire Your consent for storing the CV and using it in the job application process in future.

4.3.2. Use of Personal Information

- A. We use the personal information for the following purposes:
 - a. to evaluate You for the job that you applied for;
 - b. to contact You (by telephone, email or mail) for the purposes that concern Your application for the job.

4.3.3. Legal Basis for Processing

- A. We process Your personal information on the following legal grounds:
 - a. Your consent when you apply for the job;
 - b. taking steps at Your request to enter into a contract;

¹ According to Estonian Electronic Identification and Trust Services for Electronic Transactions Act, employees of qualified trust service providers who engage in the provision of trust services shall not have a valid criminal record for an intentionally committed criminal offense.

- e. fulfilling Our legal obligations (e.g., accounting obligations, requests from state authorities, obligations of trust services provider).

4.3.4. Disclosure of Personal Information

A. We may disclose personal information to:

- a. courts, regulatory authorities, extrajudicial authorities, and law enforcement officers as required by law.

5. Related Policies, Procedures and Documents

A. [Terms of Use for guardtime.com](#)

Appendix A: Document Versioning and Review History

Date (MM.YYYY)	Version	Author	Changes
01.2018	1.0	CISO	Document creation.
05.2018	1.1	CISO	Compliance check.
09.2018	1.2	CISO	Minor updates.
11.2018	1.3	PWC	Restructuring to improve the readability and understandability.
01.2019	1.4	Technical Writer	Reformat styles to improve consistency throughout GT's documents.
02.2019	1.4	Legal Team	Legal review and necessary updates.
04.2019	1.5	Product Owner	<ul style="list-style-type: none">- Editorial and grammar fixes.- Added section 4.3 for processing data of job applicants.
		Legal Team	<ul style="list-style-type: none">- Refinements to the cookies policy and updates regarding the consent implementation.
01.2020	1.6	CISO	<ul style="list-style-type: none">- Company legal form change (Guardtime AS -> Guardtime OÜ).- Annual review.
05.2021	1.7	CISO Office, Legal Team	Minor wording changes, added section for related documents and policies.
05.2022	1.7	CISO	Annual review, no substantial changes.
07.2023	1.7	CISO	Annual review.