



QTSP PRIVACY STATEMENT FOR THE PROTECTION OF PERSONAL DATA & GENERAL INFORMATION

26 June 2019

Version 1.1

Document History

Version	Date	Author	Reason for Change
1.0	26/07/2018	Paris Erotokritou	Initial publication
1.1	26/06/2019	Paris Erotokritou	Minor changes in the text, addition of section 13

Document Approvals

Version	Date	Approved By
1.0	26/07/2018	Steering Committee
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Document Distribution List

Version	Date	Role/Name
1.0	26/07/2018	All QTSP Staff
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This Privacy Statement aims to give you information on how JCC Payments Systems Ltd (referred to as 'we', 'us', 'our', 'JCC Payment Systems' or 'JCC') collects, uses, discloses and processes your personal data through your use of the <https://trust.jcc.com.cy> and <https://pki.jcc.com.cy> (hereinafter referred to as "the Websites") and the means by which this is done. The Privacy Statement as a means of notifying the website visitors of their rights in accordance with local law and the EU General Data Protection Regulation (EU) 2016/679.

JCC Payment Systems Ltd is committed to protecting your privacy and developing technology that gives you the most powerful and safe online experience.

By accessing, browsing and/or using this Website, you consent to the data practices described in this Privacy Statement and acknowledge that you have read, understood, and agree, to be bound by these terms conditions, and notices contained herein and to comply with all applicable laws and regulations.

For the purposes of this Privacy Statement "Personal Data" refers to all data which relates to a living individual who can be identified from such data such as for instance, name, address and/or identification number. It does not include data where the identity has been removed (anonymous data).

1. WHO WE ARE

JCC Payment Systems Ltd is a licensed payment institution registered in Cyprus under registration number HE29914 as a private limited liability company having its registered office and head offices at 1 Stadiou Street, 2571 Industrial Area Nisou, P.O. Box 21043, 1500 Nicosia, Cyprus which is primarily engaged in the business of card-processing and acquiring.

In accordance with the European Union's Regulation for Electronic Identification and Authentication Services ("eIDAS")¹ JCC acts as a qualified trust service provider (QTSP).

The overall purpose of eIDAS is to set an electronic identification standard to achieve safe and streamlined online transactions across Europe.

Via the Websites JCC offers secure qualified trust services to you, the customer, for the generation and use of an Authentication Certificate or an EU Qualified Certificate for Electronic Signatures/Seals. In the instance that you apply for a Digital Certificate, JCC (as a Trust Service Provider, as such term is defined in the eIDAS Regulation) requires personal information, so as to proceed with the issuing of your digital certificates. This information may include your name, email address, physical address, phone number and/or post code or other personal information.

¹ eIDAS was set out in order to give consistency to regulations in the EU regarding electronic signatures, thereby improving trust. It seeks to enhance trust in electronic transactions in the EU's internal market by providing a common foundation for secure electronic interaction between citizens, businesses and public authorities cross-borders, in order to increase the effectiveness of public and private online services, electronic business and electronic commerce in the Union.

What personal information may be required from you depends on the type of Trust Services you require. For further information on JCC's different types of Trust Services, please refer to our JCC's Certificate Practice Statement (CPS) available at: <https://pki.jcc.com/repository>.

JCC is committed to protecting your privacy and handling your data in an open and transparent manner. The personal data that we collect, and process depends on the service requested and agreed in each case.

2. WHAT PERSONAL DATA WE PROCESS AND WHERE WE COLLECT IT FROM

We collect and process different types of personal data which we receive from our customers (potential and current) in person or via their representative or via our alternative channels of communication such as <https://trust.jcc.com.cy> and <https://pki.jcc.com.cy>, in the context of our business relationship.

We may also collect and process personal data from publicly available sources (e.g. the Department of Registrar of Companies and Official Receiver) which we lawfully obtain and we are permitted to process.

If you have any questions, or want more details about how we use your personal information, you can contact our Data Protection Officer at 1 Stadiou Street, 2571 Industrial Area Nisou, 1500 Nicosia, Cyprus, email: dpo@jcc.com.cy.

3. WHETHER YOU HAVE AN OBLIGATION TO PROVIDE US WITH YOUR PERSONAL DATA

In order that we may be in a position to proceed with a business relationship with you, you must provide your Personal Data to us which are necessary for the required commencement and execution of a business relationship and the performance of our contractual obligations.

We are furthermore obligated to collect such Personal Data given the provisions of the Law for the Prevention and Suppression of Money Laundering Activities of 2007 to 2018 ('the AML/CFT Law'), that requires that We verify your identity before we enter into a contract or a business relationship with you or the legal entity for which you are the authorized to act as representative and/or agent and/or are the beneficial owner.

You must, therefore, provide us at least with your identity card/passport so that we may comply with our statutory obligation as mentioned above. In case of non-Cypriot nationality, identity is NOT accepted and passport must be accompanied with an official attestation of Passport is required in the case of non-Cypriot Nationality natural person that must be in the Greek or English language

Kindly note that if you do not provide us with all required Personal Data, then we will not be allowed to commence or continue our business relationship either to you as an individual or as the authorized representative/agent or beneficial owner of a legal entity.

4. WHY WE PROCESS YOUR PERSONAL DATA AND ON WHAT LEGAL BASIS

We are committed to protecting your privacy and handling your Personal Data in an open and transparent manner and as such we process your Personal Data in accordance with the GDPR and the local data protection law for one or more of the following reasons:

A. For the performance of the Services provided to you

Your information, whether public or private, will not be sold, exchanged, transferred outside of our Company and its subsidiaries, or given to any other company for any reason without your consent and will not be used for any other than the purposes specified below:

- With respect to process applications for JCC Products and Services in relation to Electronic Identification and Authentication Services.
- With respect to the processing of all and/or any certificate purchase requests;
- To provide you with technical and customer support
- To issue and/or, revoke and/or process Digital Certificates in accordance with our CPS;
- So as to verify your identity and entitlement to products or services in accordance with our CPS;

B. For compliance with a legal obligation

We collect your Personal Data so as to comply with the legal obligations emanating from the eIDAS regulation and Applicable National Law.

C. For the purposes of safeguarding legitimate interests

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. We process Personal Data so as to safeguard the legitimate interests pursued by us or by a third party. A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you.

D. You have provided your consent

By using the Websites or our Services you consent to the use of your personal information as described in this Privacy Statement. Except as set forth in this Privacy Statement, your Personal Data will not be used for any other purpose without your consent. You may withdraw your consent to our processing of your personal information at any time by informing us in writing. However, withdrawing your consent may result in your inability to continue using the Websites and/or the Services.

5. WHO RECEIVES YOUR PERSONAL DATA

In the course of the performance of our contractual and statutory obligations your personal data may be provided to various departments within JCC. Various service providers and

suppliers (sub-processors) may also receive your Personal Data so that we may perform our obligations. Such service providers and suppliers enter into contractual agreements with JCC by which they observe confidentiality and data protection according to the data protection law and GDPR.

It must be noted that we may disclose data about you for any of the reasons set out hereinabove, or if we are legally required to do so, or if we are authorized under our contractual and statutory obligations or if you have given your consent. All data processors appointed by us to process Personal Data on our behalf are bound by contract to comply with the GDPR provisions.

Under the circumstances referred to above, recipients of personal data may be, for example:

- Supervisory and other regulatory and public authorities, in as much as a statutory obligation exists.
- Companies who assist us with the effective provision of our services to you by offering technological expertise, solutions and support.

6. TRANSFER OF YOUR PERSONAL DATA TO A THIRD COUNTRY OR TO AN INTERNATIONAL ORGANISATION

Your personal data may be transferred to third countries i.e. countries outside of the European Economic Area in the context of providing our Services or if this data transfer is required by law or you have given us your consent to do so.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe such as the Model Contract of the European Commission for transfers of Personal Data to third countries,
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

7. TO WHAT EXTENT THERE IS AUTOMATED DECISION-MAKING AND WHETHER PROFILING TAKES PLACE

In establishing and carrying out a business relationship, We generally do not use any automated decision-making. We may process some of your data automatically, with the goal

of assessing certain personal aspects (profiling), in order to enter into or perform a contract with you, in the following cases:

- Data assessments (including on payment transactions) are carried out in the context of combating money laundering and fraud. An account may be detected as being used in a way that is unusual for you or your business. These measures may also serve to protect you.
- Credit scoring is used as part of the assessment of your creditworthiness. This calculates whether you or your business will be able to meet any future payment obligations pursuant to a contract. This helps us make responsible financial security decisions that are fair and informed.

8. HOW WE TREAT YOUR PERSONAL DATA FOR MARKETING ACTIVITIES AND WHETHER PROFILING IS USED FOR SUCH ACTIVITIES

A. Marketing / Promotional offers from Us

We may use your Personal Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or have purchased our Services from us and you have not opted out of receiving that marketing. Your consent is therefore needed in such cases.

B. Third-party marketing

We will get your express opt-in consent before we share your Personal Data with any third party for marketing purposes.

You have the right to object at any time to the processing of your personal data for marketing purposes, which includes profiling, by contacting at any time JCC in person or in writing.

9. HOW LONG WE KEEP YOUR PERSONAL INFORMATION FOR

In accordance with the eIDAS Regulation for Qualified Trust Service Providers We will retain your Personal Data for a period of seven (7) years from the date that the Digital Certificate has expired or has been revoked.

10. YOUR DATA PROTECTION RIGHTS

You have the following rights in terms of your personal data we hold about you:

- **Receive access to your personal data.** This enables you to e.g. receive a copy of the personal data we hold about you and to check that we are lawfully processing it. In order to receive such a copy you can contact us at the email: dpo@jcc.com.cy.
- **Request correction [rectification]** of the personal data we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.
- **Request erasure of your personal information.** This enables you to ask us to erase your personal data [known as the 'right to be forgotten'] where there is no good reason for us continuing to process it.
- **Object to processing of your personal data** where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. If you lodge an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms.
- **Request the restriction of processing** of your personal data. This enables you to ask us to restrict the processing of your personal data, i.e. use it only for certain things, if:
 - it is not accurate,
 - it has been used unlawfully but you do not wish for us to delete it,
 - it is not relevant any more, but you want us to keep it for use in possible legal claims,
 - you have already asked us to stop using your personal data but you are waiting us to confirm if we have legitimate grounds to use your data.
- **Request to receive a copy** of the personal data concerning you in a format that is structured and commonly used and transmit such data to other organisations. You also have the right to have your personal data transmitted directly by ourselves to other organisations you will name [known as the right to data portability].
- **Withdraw the consent** that you gave us with regard to the processing of your personal data at any time. Note that any withdrawal of consent shall not affect the lawfulness of processing based on consent before it was withdrawn or revoked by you.

To exercise any of your rights, or if you have any other questions about our use of your personal data, please contact our Data Protection Officer at the email: dpo@jcc.com.cy. We endeavour to address all of your requests promptly.

You have a right to lodge a complaint in the instance that your concerns about how we use your personal data have not been adequately addressed by us. You may inform Us of this by sending an email to our Data Protection Officer at email: dpo@jcc.com.cy or directly lodge a complaint with the Office of the Commissioner for Personal Data Protection at <http://www.dataprotection.gov.cy>.

11. CHANGES TO THIS PRIVACY STATEMENT

We may modify or amend this Privacy Statement from time to time.

We will notify you appropriately when we make changes to this privacy statement and we will amend the revision date at the top of this page. We do however encourage you to review this statement periodically so as to be always informed about how we are processing and protecting your personal information.

12. COOKIES

The Websites consist of "cookies" to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a Web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you. One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you use and/or register with our Services a cookie helps JCC recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same Website, the information you previously provided can be retrieved, so you can easily use the JCC features that you customized. You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Websites you visit.

13. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We reiterate that the security of your personal information is important to us and this is why we maintain physical, electronic, and procedural safeguards to secure your personal information. JCC secures the personally identifiable information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. When personal information are transmitted these are protected through the use of encryption such as the Secure Socket Layer (SSL) protocol.