

Privacy Policy

EJBCA SaaS

C2 Company, a PrimeKey company (“PrimeKey”, “we”, “us” or “our”) care about your privacy. We therefore want to inform you about how we process your personal data and what rights you have.

This privacy policy applies to those who contact us or visit our website (EJBCA SaaS Portal) as a customer or represent one of our customers or potential customers in relation to the EJBCA SaaS services.

In summary, we process your personal data for the following purposes:

- Communicate with you
- Provide our products and/or services
- Market analysis
- Administrate our contract with you or the organization you represent
- Comply with legal obligations

Depending on the relationship we have with you, we process your personal data for all or only some of the purposes described above. Which of these personal data processes that concern you are set out in the privacy policy.

Below you can read more about how and why we process your personal data. We describe what rights you have when we process your personal data e.g. that you have the right to lodge a complaint to the supervisory authority and that you can object to marketing at any time.

We also describe what legal basis we have for the processing and how long we store your personal information.

Who is responsible for the processing of your personal data?

PrimeKey is responsible (controller) for the processing of your personal data when we process your personal data for our own purposes.

If you have any questions regarding our processing of your personal data, or if you want to exercise any of your rights, please contact us at info@primekey.com.

Do you have to provide your personal data to us?

We must process some personal data in order to provide you with the applicable products and/or services in accordance with our agreement and to be able to comply with legal or other requirements. You must therefore provide us with this personal information.

If you do not provide such personal information, you will not be able to purchase our products and/or services. You can read what personal information you have to provide in the tables below where the legal basis is stated to be “performance of contract” or “legal obligation”.

Who has access to your personal data and why?

Your personal data is primarily processed by us. The following third party will have access to some of your personal information as set out below.

- Amazon Web Services (“AWS”) is the cloud provider engaged by PrimeKey for the hosting of the EJBCA SaaS services. As such, it is necessary for AWS to process your personal data in order for us to provide you with the EJBCA SaaS services.

If you want to know more about who we share your personal data with AWS, please feel free to contact us. Our contact details can be found above.

Do we share your personal data outside the EU/EES?

In general, we always strive to process personal data relating to European customers in the EU/EEA. However, in some situations, the personal data may be transferred to and processed in countries outside the EU/EEA. In the case of personal data being processed outside the EU/EEA, there is either a decision by the Commission that the third country in question guarantees an adequate level of protection or appropriate safeguards, in the form of standard contract clauses or binding corporate rules, which ensure that your rights are protected. We continuously evaluate the use of the standard contract clauses to ensure that they provide sufficient protection for your rights under applicable data protection legislation.

With regard to the EJBCA SaaS services, you will be able to choose where your data will be processed. If you only want us to process your data in a specific country, it is your responsibility to select the appropriate country when the environment is instantiated. However, the initial registration data (i.e. name and email address) will be stored through AWS in the US.

If you would like to obtain a copy of the safeguards we have taken or information on where these have been made available, you may obtain this by contacting us at the contact details provided at the beginning of this Privacy Policy.

What are your rights?

Under data protection legislation, depending on the circumstances, you are entitled to a variety of rights when we process your personal data. These rights are set out below.

If you have any questions regarding these rights or if you want to use any of your rights, you are welcome to contact us. Our contact details can be found in the beginning of this privacy policy.

Right to withdraw consent and to object to processing

In case we use consent as a legal ground for processing personal data, you have the right to withdraw all or part of the consent you have provided to us for our processing of your personal data.

You always have the right to object to the processing of your personal data for marketing purposes and profiling, such as newsletters and custom marketing.

You also have a right to object to our processing of your personal data when the processing is based on the legal basis legitimate interest. Read more about what balance of interest means below. In some instances, we may continue to process your personal data even if you have objected to our processing. This can be the case if we can show compelling legitimate reasons for the processing that outweigh your interests or if it is for the purpose of establishing, exercising or defending against legal claims.

Right to access

You have the right to obtain a confirmation on whether we process your personal data. If we process your personal data, you also have a right to receive information about how we process the personal data and to receive a copy of your personal data.

Right to rectification

You have a right to have inaccurate personal data corrected and to have incomplete personal data completed.

Right to erasure (“right to be forgotten”) and restriction of processing

You have the right to have your personal data erased in certain instances. This is the case e.g. when the personal data is no longer necessary for the purposes for which it was collected or otherwise processed and where we process your personal data on the basis of our legitimate interest and we find, following your objection (see above under right to withdraw consent and to object to processing), that we do not have an overriding interest in continuing to process it.

You also have a right to request that we restrict our processing of your personal data. For example, when you question the accuracy of the personal data, when you have objected to our processing of your personal data based upon our legitimate interest, or where the processing is unlawful, and you oppose to the erasure of your personal data and instead want us to restrict our processing.

Right to data portability

You have a right to, in certain instances, be provided with such personal data (concerning you) that you have provided to us, in a structured, commonly used and machine-readable format. You also have a right to, in certain instances, have such personal data transferred to another controller, where technically feasible (“data portability”).

The right to data portability applies to personal data that you have provided to us in a structured, commonly used and machine-readable format if the processing is based on your consent or an agreement and the processing is automated.

Right to lodge a complaint to a supervisory authority

You have the right to lodge a complaint to a supervisory authority concerning our processing of your personal data.

If you live in the EU/EEA, such a complaint can be filed with the authority in the EU/EEA member state where you live, work or where the alleged infringement of applicable data protection legislation has occurred.

Detailed description on how we process your personal data

We process personal data that we have received from you or that we have collected ourselves. Your personal data is processed as described in the tables below.

Here you can read more in detail why we process your personal data, what categories of personal data we process and what the legal basis for the processing of your personal data is. You can also read about how long we store your personal information.

In our cookie policy you can also read about how we use cookies, see [Cookie Policy](#).

General processing regardless of our relationship with you

Purpose: To communicate with you		
Processing performed	Personal data we process	Legal basis
Answer and manage your communications, such as questions you ask us about our products and/or services or in connection with customer service and support	<ul style="list-style-type: none"> Identity and contact information Information you provide us with 	Balance of interests <i>The processing is justified by our legitimate interest to be able to communicate with you, for example in order to answer and handle questions from you.</i>
Retention time: We store your personal data for six months from the end of our communication. The personal data can also be stored for a longer time for other purposes.		

For you who are or represent a potential customer or customer to us

Purpose: To provide the EJBCA SaaS service		
Processing performed	Personal data we process	Legal basis
<ul style="list-style-type: none"> Provision of the EJBCA SaaS service including creating: <ul style="list-style-type: none"> Digital certificates Digital signatures Private keys Administration of the customer relationship Send order and delivery confirmation	<ul style="list-style-type: none"> Enrolment data (including AWS account id and email address). Registration data (including identity and password) Contact information Operational data including: <ul style="list-style-type: none"> Digital certificates Digital signatures Private keys IP-address Domain names 	<i>If you are a private person or individual trader:</i> Performance of contract <i>The processing is necessary for us to fulfill our agreement with you. If the personal information is not provided, you will not be able to make a purchase with us.</i>

Purpose: To provide the EJBCA SaaS service		
Processing performed	Personal data we process	Legal basis
	<ul style="list-style-type: none"> Information from our communication with you 	<p><i>Social security numbers are processed for the importance of a secure identification.</i></p> <p><i>If you are a representative:</i></p> <p>Balance of interests</p> <p><i>The processing is justified by our legitimate interest in being able to enter into and execute agreements with the organization you represent.</i></p>
<p>Retention time: We store your personal data, like AWS, for 90 after you stop paying your bill or cancel your subscription. Active customers only have data archived for up to one year. Further, if you are a representative, we will stop storing your personal information if we become aware that you no longer represent the organization.</p>		

Purpose: To handle claims		
Processing performed	Personal data we process	Legal basis
<ul style="list-style-type: none"> Handle and initiate potential claims such as, for example, the withdrawal of purchases, complaint cases and warranty claims 	<ul style="list-style-type: none"> Identity and contact information Information from our communication with you in relation to the claim Relevant information on you that the claim concerns 	<p>Performance of contract The processing is necessary for us to fulfill our rights and obligations as a result of our agreement with you or the organization you represent.</p> <p>Legal obligation The processing is necessary to comply with consumer or purchasing legislation.</p> <p>Balance of interests We also have a legitimate interest in being able to initiate and defend ourselves against potential legal claim.</p>
<p>Retention time: The data is stored from the initiation of the claim and as long as the process regarding the claim is ongoing. If necessary, data may be processed for as long as required by the applicable statutes of limitations. However, if you are a representative, we will stop storing your personal information if we become aware that you no longer represent the organization.</p>		

Purpose: Market analysis		
Processing performed	Personal data we process	Legal basis
<ul style="list-style-type: none"> To carry out market surveys, such as customer satisfaction, views of our offering and potential for development Create reports based on answers and conclusions from surveys 	<ul style="list-style-type: none"> Identity and contact information 	<p>Balance of interests</p> <p>The processing is justified by our legitimate interest in being able to contact you with a request to evaluate our products and / or services in order to improve them.</p>
<p>Retention time: We store your personal data for six months after a survey. Data may then be anonymized to be kept in aggregate form for a longer period of time.</p>		

Balance of interests

As we state above, for some purposes, we process your personal data and rely on our legitimate interest as the legal basis for the processing. The balance of interests means that we have carried out a balance of interests test where we have determined that our legitimate interest for the processing outweighs yours interests or rights which require the protection of your personal data. We have stated what our legitimate interest are in the tables above.

You are welcome to contact us if you want to read more about how we have undertaken this test. Our contact details are as stated in the beginning of this privacy policy.

Cookie Policy

What Are Cookies

As is common practice with almost all professional websites this site uses a cookie, which is a tiny file that is downloaded to your computer, to improve your experience. This page describes what information we gather, how we use it, and why we sometimes need to store cookies. We will also share how you can prevent cookies from being stored.

How We Use Cookies

We use cookies to improve your experience with our product. Unfortunately, in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this site. It is recommended that you leave on all cookies if you are not sure whether you need them or not, in case they are used to provide a service that you use.

Disabling Cookies

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will disable the functionality of the EJBCA SaaS product and will prohibit you from logging in. Therefore, it is strongly recommended that you do not disable cookies.

The Cookies We Set

- Session related cookies

We use cookies when you are logged in so that we can remember this fact. This prevents you from having to log in every single time you visit a new page. These cookies are typically removed or cleared when you log out to ensure that you can only access restricted features and areas when logged in. The cookie does not store any of your personal information.

Third Party Cookies

The EJBCA SaaS product does not use any third-party cookies.