

# WORKFLOW SIGNING SERVICE

PRODUCT PRIVACY NOTICE



# Contents

Workflow Signing Service Product Privacy Notice	3
Workflow Signing Service (formerly SignHost)	3
Description	3
Personal Data Collection and Processing	3
Retention Periods	5
Use of Sub-Processors	5
International Data Transfers	5
Data Protection Measures	5
Data Privacy Rights	5
Amendments to this Privacy Notice	6
Contact Information	6



# Workflow Signing Service Product Privacy Notice

Last updated: May 8, 2024

# Workflow Signing Service (formerly SignHost)

This product privacy notice describes how Workflow Signing Service collects and processes personal data pursuant to applicable data privacy laws.

### **Description**

Workflow Signing Service is a cloud-based signing solution that Customers can use to obtain electronic signatures and remotely verify identities including:

- Identifying a signer/person via their e-mail address and name or via their telephone number (a unique code is send to the receiving party)
- Identifying a signer/person via their bank account number using iDEAL identity vertification services
- Identify a signer/person via the national Dutch ID solution (used for identification where the social security number is checked) This service is only available in the Netherlands for government organisations.
- Allowing individuals to confirm their identities without using hard copies or scans of identity documentation by utilizing iDin identity verification services. iDIN can be used for secure login, electronic identification, electronic signature, and age verification.
- Identifying individuals for electronic transactions, such as making online purchases, logging in, providing electronic signatures, or confirming their age online by using a Belgian e-ID
- Verifying documents using a passport/selfie check. The OCR method allows a web verification that scans and reads the MRZ–code from your passport, ID or residence permit.
- Verifying new clients or employees based on locally available electronic identities, NFC chip reader, or via a Passport/National ID card selfie check.

### **Personal Data Collection and Processing**

Entrust shall, depending on the services obtained by the Customer and the way in which the Customer is using the services, process data subjects' personal data as mentioned below, on behalf of the Customer. Certain categories of personal data, as mentioned below, are optional and will only be processed at the discretion of the Customer.

The categories of data subjects to whom the personal data relates are:

- The signers of the documents that are processed via the services of Entrust, and
- The senders of the documents that are processed via the services.



• All users of Workflow Signing Service.

Personal Data Type	Mandatory/Optional depending on services obtained	Purpose for Processing
First and last name	Mandatory	Identify individual/signatory
Email address	Mandatory	Send signing/ identification request
Signature	Mandatory	Evidence of consent
IP Address	Mandatory	Identity verification of signatory
Signer ID	Mandatory	Identity verification of signatory
Address	Optional	iDin identity verification services; qualified electronic signatures
Phone number (mobile)	Optional	Identity verification of signatory for Customers using SMS
Bank account number	Optional	Identity verification of signatory for iDEAL
Name of Bank Account Owner	Optional	Identity verification of signatory for iDEAL
Date of birth	Optional	Identity verification for iDEAL, iDIN, and Passport/National ID card selfie check; qualified electronic signatures
Citizen Service Number	Optional	DigiD verification
Passport/identity card number	Optional	Qualified electronic signatures; Identity verification using Passport/National ID card selfie check
RFID	Optional	Identity verification using NFC chip reader
Machine readable zone identity document	Optional	Identity verification using Passport/National ID card selfie check
Biometric data (scan of facial geometry)*	Optional	Identity verification using Passport/National ID card selfie check

Workflow Signing Service integrates with other Entrust offerings including Identity as a Service (IDaaS), Remote Signing Services (RSS), Signing Automation Services, and Verified Mark Certificates (VMC). For more information about privacy considerations for these offerings, review Entrust's Product Privacy Notices for Identity as a Service and Entrust Certificate Services Platform.



#### **Retention Periods**

We comply with applicable laws governing the retention of personal data. We retain personal data for as long as we need to fulfil our business purposes, as set forth in this privacy notice. Factors that influence the length of time that we retain your data include: the information needed to provide products, services, and experience to the customer; the data needed to manage customer accounts; and finally, the data needed to meet regulatory, audit, and certification requirements. Entrust's retention of biometric data is governed by the Entrust Biometric Data Policy.

Workflow Signing Service's standard retention periods for those using the cloud-based signing solution can be accessed <u>here</u>. The link also provides guidance on how to modify the standard retention periods.

Workflow Signing Service deletes personal data immediately after use for the purpose of providing the service.

#### **Use of Sub-Processors**

Workflow Signing Service utilizes various sub-processors depending on which products the Customer purchases. For the current list of sub-processors, visit <u>https://www.entrust.com/legal-compliance/privacy/sub-processors</u>.

#### **International Data Transfers**

At this time, data is not being transferred to any countries outside of the European Economic Area (EEA). In the future, any cross-border transfers of personal data will be made in accordance with relevant data privacy law requirements. For example, Entrust will ensure that personal data that is transferred outside of the European Economic Area (EEA) benefits from an adequate level of protection by requiring sub-processors to enter into the European Commission approved Standard Contractual Clauses (and/or their UK and Switzerland equivalents) if they are not in a country that has the benefit of an <u>adequacy decision</u>.

#### **Data Protection Measures**

For more information on how Entrust processes personal data collected by this product, please refer to Schedule 2 Annex II to the Standard Contractual Clauses of our standard customer data processing addendum (DPA) found <u>here</u>.

#### **Data Privacy Rights**

The Customer is the controller for all personal data processed by Entrust for the purpose of providing Workflow Signing Service. Entrust Corporation, as the processor/service provider, will assist the Customer, to the extent reasonable and practicable, in responding to data subject requests the Customer receives with respect to Workflow Signing Service.



# **Amendments to this Privacy Notice**

Entrust reserves the right to amend this product privacy notice from time to time as our business, laws, regulations and industry standards evolve. Any changes are effective immediately following the posting of such changes to <u>https://www.entrust.com/legal-compliance/product-privacy</u>. We encourage you to review this notice from time to time to stay informed.

# **Contact Information**

For questions about this product privacy notice, please contact <u>privacy@entrust.com</u>. For Entrust's general privacy statement, please click <u>here</u>.