

NIC PKI PRIVACY POLICY

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0.9	14/07/2024	Digital Trust Governance Department	Initial Draft
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Document Control

This document shall be reviewed annually by the custodian of the General Directorate of Digital Certification Department, and an update may occur earlier if internal or external influences affect its validity.

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1. POLICY PURPOSE AND SCOPE

1.1 Policy Purpose

This policy document is to outline additional controls and actions required of the Saudi National Public Key Infrastructure (PKI) Program.

This policy covers the following topics as it relates to information collected by NIC and DTSPs (Digital Trust Service Providers) through Certificate Life-Cycle Management including, but not limited to:

- The data that will be collected and the purpose of collecting it
- Data Collection Methods
- Use of Personal Data
- Protection, Storage and Destruction of Personal Data
- Legal Basis for Collecting and Processing Personal Data
- Rights of the Personal Data Subject
- Sharing/exchanging of Personal Data
- External Links
- Exercising the Rights of the Personal Data Subject
- Personal Data Protection Officer
- Complaints and inquiries
- Privacy Policy Updates

1.2 Scope

This policy addendum is applicable only to employees and systems within the Saudi National PKI program and does not supersede existing SDAIA policies.

2. POLICY

2.1 CLAUSE 1: INTRODUCTION

The Saudi Data & AI Authority (SDAIA) was established by Royal Order No. (A/471) dated 12/29/1440 AH, and is directly linked to the Prime Minister.

The National Data Management Office (NDMO), the National Center for AI (NCAI), and the National Information Center (NIC) are organizationally linked to SDAIA.

The Authority shall have legal standing and financial and administrative independence. SDAIA is keen on the user's data and information and committed to maintaining the confidentiality and privacy of this data and using it to reach the desired level in providing the necessary service to the user in accordance with the terms and conditions in force in the Kingdom of Saudi Arabia.

The act of using any SDAIA PKI related data or technologies, such as the repository website (<u>http://ca.nic.gov.sa</u>) and/or the initiation of a certificate application, is considered as the user's acceptance and approval of this privacy policy.

2.2 CLAUSE 2: THE DATA THAT WILL BE COLLECTED AND THE PURPOSE FOR COLLECTING IT

First: Personal data that may be collected:

- User's Full Name (Legal Name)
- Email
- Phone Number
- National ID
- Address
- Institute or Company Name
- Institute or Company Location

Second: Purpose of collecting personal data

Personal data is collected in order to enable issuance of certificates and follow up on any inquiries, suggestions, requests, investigations, applications (such as certificate applications), or complaints submitted by the user.

#	Data to be collected	Purpose of collecting the data	Optional/Mandatory
1	User's Full Name (Legal Name)	Certificate issuance, applications (such as certificate applications), or complaints	Mandatory
		submitted by the user.	
2	Email	Certificate issuance, inquiries, suggestions, requests, investigations, applications (such as certificate applications), or complaints submitted by the user.	Mandatory
3	Phone Number	Certificate issuance, inquiries, suggestions, requests, investigations, applications (such as certificate applications), or complaints submitted by the user.	Mandatory

4	National ID	Certificate issuance and applications	Mandatory
		(such as certificate applications)	
5	Address	Certificate issuance	Optional
6	Institute or Company Name	Certificate issuance and applications	Mandatory
		(such as certificate applications)	
7	Institute or Company	Certificate issuance and applications	Mandatory
	Location	(such as certificate applications)	

2.3 CLAUSE 3: DATA COLLECTION METHODS

The data that the data subject provides is collected through the Certificate Life-Cycle process during the registration phase. Details for the Certificate Life-Cycle process are captured as part of the Saudi National CA Certificate Policy (CP).

The data collected is used only by NIC, or the entities that are involved in the operation of The Saudi National PKI, such as DTSPs, RAs, LRAs, CAs, and Repositories.

Your personal data is collected indirectly through cookies that are collected when you visit the PKI repository website (<u>http://ca.nic.gov.sa</u>).

2.4 CLAUSE 4: USE OF PERSONAL DATA

Personal data is used for the purposes of completing the certificate application process. SDAIA will prevent the examination of or tampering with personal data or business records other than for the purposes of maintenance or security of the relevant information processing system or data integrity.

Notwithstanding the foregoing, information contained in certificates and related certificate status information is not confidential. NIC private PKI repositories containing proprietary information meant for internal use are only accessible to NIC PKI System components. Public Repositories containing public key, certificate expiration date, certificate status, and other identifying information about the Subscriber (based on the type of certificate) are accessible by Relying Parties and Subscribers in accordance with the respective CA CP and CPS.

2.5 CLAUSE 5: PROTECTION, STORAGE AND DESTRUCTION OF PERSONAL DATA

Personal data is stored inside the Kingdom of Saudi Arabia in the servers of the National Information Center. These servers are protected with the best technologies in accordance with the policies and controls of the National Authority for Cybersecurity and international standards in order to prevent unauthorized entry and reduce cyber risks. Then, the data will be destroyed within ten (10) years from the date of its storage in a secure manner, through which it cannot be viewed or retrieved again, according to the policies of the National Information Center.

2.6 CLAUSE 6: LEGAL BASIS FOR COLLECTING AND PROCESSING PERSONAL DATA

The collection and processing of personal data is based on the consent of the personal data subject. The personal data subject can revoke their consent to the collection and processing of their personal data at any time unless there is another legal basis, and to do so, they can contact the Data Management Office of the Saudi Data & AI Authority (SDAIA). The personal data subject can withdraw their consent to the processing of their personal data - at any time - unless there are legitimate purposes that require the contrary.

Email: dmo@sdaia.gov.sa

2.7 CLAUSE 7: RIGHTS OF THE PERSONAL DATA SUBJECT

- Right to know: The Subject of personal data has the right to know how we collect their data, the legal basis for collecting and processing data, how data are processed, stored and destroyed, and with whom the data will be shared. You can browse all the details through the privacy policy (this policy) or you can contact us using the means of communication described in Clause 10.
- **Right to access personal data:** The subject of personal data has the right to access their personal data at disposal of the Controller.
- **Right to request access to personal data:** The personal data subject has the right to request a copy of their personal data indicated in Clause 11 from the data controller, and it will be provided to them -free of charge- within 30 days. The controller may extend this in the event that implementation requires an unexpected or unusual additional effort or if it receives multiple requests from the personal data subject, for a period not exceeding (thirty) days, provided that the controller notifies the personal data subject in advance of the extension and its justifications.

- **Right to rectify personal data:** The personal data subject has the right to request the correction of their personal data that they deem inaccurate, incorrect, or incomplete via the email indicated in Clause 11, and it will be reviewed and updated within [fourteen working days], and the data subject will be notified by email.
- **Right to destroy personal data:** The personal data subject has the right to request the destruction of their personal data in certain circumstances unless there is a legal text specifying a specific period of retention or contractual requirements.

2.8 CLAUSE 8: SHARING/EXCHANGING PERSONAL DATA

We may share your personal information with third parties for the purposes of fulfilling our obligations to you, including with:

- Other departments or divisions within our network
- WebTrust Auditors
- WebTrust or CAB Forum committees
- third parties as required by applicable law

In circumstances where information is shared with such third parties, they are required to agree to confidentiality terms. This prohibits such third parties from selling, trading, using, marketing, or otherwise distributing our customer information.

2.9 CLAUSE 9: EXTERNAL LINKS

Links to other websites have been provided on the PKI repository's website (<u>http://ca.nic.gov.sa</u>), taking into account the user's needs. SDAIA is not responsible for any contents on those websites, nor any person's use of them or their proper functioning, or for any problems that may arise from using such websites. It shall be the user's responsibility for all of their actions while using any of the websites that they visit through those links on the PKI repository's website.

2.10 CLAUSE 10: EXERCISING THE RIGHTS OF THE PERSONAL DATA SUBJECT

The personal data subject has the right to request access/ correction/destruction of their data by communicating via the following mail: Data Management Office in the Authority (SDAIA).

Email: dmo@sdaia.gov.sa

2.11 CLAUSE 11: PERSONAL DATA PROTECTION OFFICER

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Name: Data Management Office in the Authority (SDAIA).
Email: <u>dmo@sdaia.gov.sa</u>
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2.12 CLAUSE 12: COMPLAINTS AND INQUIRIES

In the event that there are complaints or inquiries related to the privacy policy or dealing with personal data, contact website management via the following email: pki@nic.gov.sa.

In the event that a response is not received within seven working days, the complaint or inquiry will be submitted to the data management in the Authority (SDAIA) <u>dmo@sdaia.gov.sa</u>.

In the event that the problem or response is not resolved within seven working days, it will be submitted to the National Data Management Office via email: <u>pr@ndmo.gov.sa</u>.

3. EXECUTOR

The executor of this policy is:

- General Manager, General Directorate of Digital Certification
- CA Policy Authority
- Digital Trust Governance Director

4. RELATED DOCUMENTS

• Respective CP/CPS's