



# eID Services

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# Privacy Policy

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## Summary

This document can be summarized as following:

- At e-Contract.be BV, we take your privacy seriously and are committed to protecting your personal information in line with prevailing privacy regulations. Additionally, e-Contract.be BV is compliant with ISO 27001 (Information Security Management System).
- When using our eID services, we retrieve information from your eID card (such as your name, first name, day and place of birth, address, etc.) to be able to provide those services.
- We do not store any of this information for business usage when using the eID services.
- Personal data might be stored within the web application of our customers that integrate our eID Services. We refer to their Privacy Policy for further details.
- We do keep personal data from our business customers that integrate our services, such as name, address, email, to be able to fulfil our legal and contractual obligations.
- You can contact us at any time on [info@e-contract.be](mailto:info@e-contract.be) or via +32 478 29 94 92 for more details.
- You also can execute your rights at any time by contacting us via [dpo@e-contract.be](mailto:dpo@e-contract.be).

## 1 Introduction

This privacy policy outlines how e-Contract.be BV collects, uses, discloses, and safeguards your personal data and personally identifiable information when you use our eID Services. By accessing or using our services, you agree to the terms of this policy. We may update this policy occasionally, so please review it periodically for any changes.

## 2 Scope

This Privacy Policy applies to the following services:

- eID Identity Provider
- Digital Signature Service

The eID services integrate different desktop software components. These include:

- the eID Web Browser Middleware (supported on Windows, Mac OS X, Linux, and FreeBSD)
- the eID Chrome Extension, in case of Chrome based web browsers

- the eID Edge Extension, in case of Edge web browsers
- the eID Extension for Firefox
- the eID Chrome OS Application for Chromebooks, together with an eID Chrome OS Extension within the Chrome web browser
- the eID Safari Extension in case of Safari web browsers on Mac OS X
- the eID iOS Application for iOS devices (iPhone and iPad)
- the eID Android application for Android based devices

Hence this privacy policy also applies to such integrated components.

### 3 Policy

In the context of the EU General Data Protection Regulation (GDPR), e-Contract.be BV operates as Data Processor commissioned by our customers who acts as Data Controller using our eID Services. Further we act as Data Controller for data related to business customer contracts.

We comply with the EU General Data Protection Regulation by:

- ensuring the confidentiality, integrity and availability of Personal Data
- protecting against any threats or hazards to the security of Personal Data
- protecting against any actual unauthorized processing, loss, use, disclosure or acquisition of or access to any Personal Data

As Data Processor and Controller, we implement and take adequate policies and technical, organizational, and physical measures as described by applicable law to protect personal data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access, in particular where the processing involves the transmission of data over a network, and against all other unlawful forms of processing. In this context, e-Contract.be BV has been ISO 27001 certified. A copy of the ISO 27001 certificate can be requested by e-mail via [dpo@e-contract.be](mailto:dpo@e-contract.be).

Our servers that process the data are hosted in a dedicated rack within the data center of Unix-Solutions BV, Hoge Wei 37A, 1930 Zaventem. Unix-Solutions BV has been ISO 27001 and ISO 9001 certified. No personal data is transferred to a country or territory outside the EEA, under the premise that this same restriction applies to the web applications of our customers.

When e-Contract.be BV acts as Data Processor, commissioned by our customers, e-Contract.be BV has no full picture over the exact usage of the personal data requested by the web applications of our customers. Hence we refer to the corresponding Privacy Policy of the web application of our customers that integrate our eID services.

## **3.1 Stored Data**

### **3.1.1 Personal Data**

The eID Identity Provider and the Digital Signature Service do not store any personal data for business usage, but only for technical logging as explained below. Personal data might be stored within the web application of our customers that have integrated our eID services. Hence we refer to the Privacy Policy of the corresponding web applications that integrate our eID services.

In case you contact us for support, it is possible that we store your name, first name, address, phone number or email address in the case that we open a support ticket. This allows us to contact you back upon resolving the issue reported by you.

### **3.1.2 Technical Logging**

The eID Identity Provider and the Digital Signature Service store technical logging that can contain limited personal data for the purpose of:

- improve the different eID services and the eID software components.
- to be able to deliver support to end-users for which the eID software components are not functioning as expected. If you call us with "hey I have a problem", we have to be able to check our logging and say "indeed, I see what is going wrong, try this or that".

The technical logging is automatically removed with a retention period of 1 to 3 months, depending on the stability of the eID services and/or eID software components.

### **3.1.3 Cookies**

Cookies serve as digital identifiers, allowing websites to recognize users and personalize their browsing experience. They store information such as user preferences, login details, and site activity, enhancing convenience by eliminating the need for users to repeatedly input the same data.

The eID services use technical session cookies to be able to deliver the wanted eID functionality: identification, authentication, and signing. These technical session cookies are non-persistent.

We do not use any tracking cookies, nor advertising cookies.

See Table 1 for an overview of all cookies that are used.

## **3.2 Anti-discrimination**

Given article 6 of the Belgian Data Protection Act of 8 December 1992, we never pass the following eID data fields to customers:

- noble condition
- special status (white cane, extended minority, yellow cane)

Tab. 1: Cookies used by e-Contract.be BV eID Services

Cookie Name	Category	Retention	Description
JSESSIONID	Functional	Session	JSESSIONID is a platform session cookie and is used by sites with JavaServer Pages (JSP). The cookie is used to maintain an anonymous user session by the server.
NG_TRANSLATE_LANG_KEY	Functional	Session	This cookie is used to store the preferred language of the user

## 4 CBFA circulaire

The eID services of e-Contract.be BV comply with the CBFA circulaire of 6 April 2010, more specific:

- The signatures on the eID data files are verified as signed by the National Register.
- The validity of the National Register certificate is checked.
- The validity of the eID certificates is checked.
- These verifications cannot be disabled.

## 5 Your Rights

As Data Processor, we support the Data Controller in their efforts to protect and handle your personal data, we do not independently address data subject rights. Therefore, for inquiries or requests related to your rights under the GDPR, please contact the Data Controller directly.

As Data Controller, within the context of business relationship with our Customers, individuals have the following rights, under the General Data Protection Regulation (GDPR), regarding their personal data. Please note that the following is a summary, and for the exact legal text and detailed conditions, it is advisable to refer directly to the GDPR itself.

**Right to Access** You have the right to obtain confirmation of whether your personal data is being processed and access to that data along with information about how it is being used.

**Right to Rectification** You have the right to request the correction of inaccurate or incomplete personal data.

**Right to Erasure (Right to be Forgotten)** You have the right to request the deletion of your personal data under certain circumstances, such as when the data is no longer necessary for its original purpose or if you withdraw consent.

**Right to Restriction of Processing** You have the right to request the restriction of processing of your personal data in certain situations, such as when the accuracy of the data is contested or processing is unlawful.

**Right to Data Portability** You have the right to receive the personal data you have provided in a structured, commonly used, and machine-readable format, and have the right to transmit that data to another controller.

**Right to Object** You have the right to object to the processing of your personal data, including for direct marketing purposes or when processing is based on legitimate interests.

**Rights in Relation to Automated Decision Making and Profiling** You have the right not to be subject to decisions based solely on automated processing, including profiling, which produces legal effects or significantly affects you.

If you wish to exercise any of these rights or have questions regarding your data, please contact us using the contact info below.

**Note:** These rights are subject to certain conditions and exceptions as outlined in the GDPR. It is advisable to seek legal advice or refer directly to the GDPR text for comprehensive information about these rights.

## 6 Contact

If you have questions regarding this Privacy Policy, or our eID services in general, you can contact us via:

e-Contract.be BV  
Brusselsesteenweg 30B  
1652 Beersel  
email: [dpo@e-contract.be](mailto:dpo@e-contract.be)  
phone: +32 478 29 94 92  
VAT Number: BTW BE 0845.600.072

The Belgian Data Protection Authority can be contacted via:

<https://www.dataprotectionauthority.be>

For other countries, see:

[https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en)