



PRIVACY POLICY

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1. POLICY STRUCTURE AND DEFINITIONS

1.1 POLICY STRUCTURE

This policy document contains the following elements:

- **Purpose:** This section clearly states the purpose of the privacy policy with regards to confidentiality of information under the stewardship of NCDC.
- **Scope:** This section defines various internal and external entities as well as the people to which a particular policy statement applies.
- **Policy Statements:** This section describes the Privacy Policy of NCDC.
- **Related NCDC Documents:** This section mentions other documents, which the user can refer to along with this policy document.
- **Compliance:** This section contains a statement that NCDC policies will be complied with and that violations may result in disciplinary action.
- **Waiver Criteria:** This section provides a formal process for obtaining approval for a waiver to a policy. Waivers should only be used in exceptional situations when communicating non-compliance with the policy for a specific period of time.
- **Executor(s):** The person responsible for implementation of a policy.

1.2 DEFINITIONS

The terms used in this document shall have the meanings as defined in NCDC Glossary which can be found at <http://www.ncdc.gov.sa>.

2. PURPOSE

NCDC Privacy Policy explains what information NCDC and CSPs collect, what that information is used for, and how the confidentiality of the information is maintained.

3. SCOPE

This document is intended for the use to all participants in the Saudi National PKI.

4. POLICY STATEMENT

4.1 GENERAL REQUIREMENTS

- NCDC Director General has responsibility for facilitating the implementation of this policy and the supporting policies and procedures.
- All NCDC and CSPs personnel, management and suppliers are responsible for implementing, complying and reporting improvements in relation to this policy and supporting policies and procedures.
- All NCDC and CSPs personnel should be aware that any breach of this privacy policy and the supporting policies could lead to disciplinary action being taken.

4.2 PRIVACY PRINCIPLES

NCDC and CSPs will have formal procedures and processes for collecting, managing and protecting all personal and private information under their stewardship.

This policy applies to all NCDC staff, all CSPs staff, contracting third parties and all their agents. This privacy policy and related practices will ensure that all participants in the Saudi National PKI understand clearly what personal information is, how it is to be used and how it is to be protected.

The privacy policy will address the following:

- The definition of the data needed to be collected to allow for issuance and validation of certificates,
- Methods by which the data will be collected,
- The purposes for which the information collected can be used,
- Protection and controls for insuring the confidentiality of the information protected.

4.3 INFORMATION AND CLASSIFICATION OF THE COLLECTED INFORMATION

The following table identifies the information that can be collected to enable issuance of a certificate. It is important to note that all of the information being collected is personally identifiable information to the identity of the applicant. As such in all cases, this information is publicly available in some format or medium.

No personally identifiable private information (example: medical and financial information) is collected.

Information Collected	Information Classification
Legal Name	Personal
Email address (if applicable by the CSP)	Personal
ID validity documents references	Personal
Address (if applicable by the CSP)	Personal

4.4 PRIVACY STATEMENT

The following is the privacy statement that NCDC will make to all participants in the Saudi National PKI.

4.4.1 PRIVACY NOTICE

NCDC privacy policy is designed to assist you in understanding how NCDC and CSPs collect, uses and safeguards the personal information you provide, and to assist you in making informed decisions when using the services offered by NCDC.

Any personal information collected by RAs/LRAs, CAs, and Repositories will be treated in accordance with this policy. NCDC and CSPs will act in accordance with current legislation in the Kingdom of Saudi Arabia, in particular the e-Transaction act.

4.4.2 COLLECTION OF DATA

NCDC considers your need to appropriately control your personal information and to know how such information may be used.

NCDC and CSPs collect information on users through registration. NCDC and CSPs only gather personal data (such as name, address, etc.) after obtaining user consent by signing the Subscriber Agreement, unless otherwise specified in Saudi law. The data collected is used only by NCDC, or the entities that are involved in the operation of NCDC, such as CSPs, RAs, LRAs, CAs, and Repositories.

4.4.3 USE OF PERSONAL DATA

NCDC and CSPs will use reasonable care to ensure that the information submitted during the certificate application, authentication of identity, and certification processes will be kept confidential. NCDC and CSPs will use that information only for the purpose of providing PKI services. Your personal information will not be sold, rented, leased, or disclosed in any manner to any person or third party without your prior consent (subject to the exclusions stated in section 4.4.6), unless otherwise required by law, or except as may be necessary for the performance of NCDC services, for auditing requirements, or as part of the regulatory compliance. NCDC and CSPs protect your personal information in a manner designed to ensure its integrity and to make available to you, following an appropriate request, any information collected. When necessary, NCDC and CSPs will take reasonable steps to ensure that inaccurate information is erased or rectified.

4.4.4 CERTIFICATE INFORMATION

Notwithstanding the foregoing, information contained in certificates and related certificate status information is not confidential. NCDC private repositories containing proprietary information meant for internal use are only accessible to NCDC-SSC 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.

4.4.5 SECURITY OF DATA

NCDC takes reasonable steps to ensure the security of its infrastructure. NCDC security, policies, and technology are intended to safeguard information from unauthorized access or improper use.

4.4.6 EXCLUSIONS

NCDC reserves the right to access and disclose individually identifiable information to comply with applicable laws and lawful government requests when the law requires it for the protection of NCDC legal rights or those of our users.

4.4.7 HANDLING CUSTOMER COMPLAINTS AND SUGGESTIONS

NCDC reserves the right to change this privacy statement at any time.

Employees, customers or partners may direct any questions or enquires with respect to the privacy policy, principles outlined or about our practices by contacting NCDC at:

Email: info@ncdc.gov.sa

Telephone: +966 11 4522197

Fax: +966 11 4522034

5. RELATED NCDC DOCUMENTS

- Audit and Compliance Policy
- Respective CA CP ,PDS and CPS
- Saudi National PKI Policy

6. COMPLIANCE

Compliance with this policy is mandatory and will be reviewed periodically by Policies and Regulations department. Violations of NCDC policies, standards, and procedures will result in corrective action by NCDC management. Disciplinary action will be consistent with the severity of the incident, as determined by an investigation, and may include, but not be limited to:

- Loss of access privileges to information assets.
- Other actions as deemed appropriate by NCDC management, Financial and Administration Services department, and Policies and Regulations department.

7. WAIVER CRITERIA

Requested waivers must be formally submitted to NCDC, including justification and benefits attributed to the waiver, and must be approved by NCDC Director General. The waiver should only be used in exceptional situations when communicating non-compliance with the policy for a specific period of time (subject to a maximum period of 1 year). At the completion of the time period the need for the waiver should be reassessed and re-approved, if necessary. No policy should be provided waiver for more than three consecutive terms. The waiver should be monitored to ensure its concurrence with the specified period of time and exception. All exceptions to this policy must be communicated through the Policy Waiver Request Form.

8. EXECUTOR(S)

The following are the executor of this policy:

- NCDC Staff;
- CSP Staff; and
- Third Party and their agents