

# **National Center for Digital Certification**

## **PRIVACY POLICY**

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## NCDSC Privacy Policy

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## Document Revision History

Version	Date	Author(s)	Revision Notes
1.0	2006	E & Y	Initial Draft
1.1	Aug, 2008	Jaser Alkhazalah	First review by Jaser and Dr. Laith from Devoteam
1.2	Dec, 2008	Jaser Alkhazalah	Review by Operations team to ensure the consistency of this policy with the Root CA CP 1.5
1.3	Jan, 2009	Naif Alotaibi	Update comments as per Dr. Fahad Comments
1.33	25/01/2009	Dr Deoraj	Final review and comments incorporated

## Document Control

This document shall be reviewed annually and an update by the NCDC may occur earlier if internal or external influences affect its validity.

## Copies of this document will be held by:

- 1 Policies, Rules and Regulations Department
- 2 NPA
- 3 Operations Department
- 4 CSP PA

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## NCDC 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 the 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 the NCDC.
- **Related Policies:** This section mentions other Policies, 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.
- **Executive Owner:** The person responsible for maintenance and accuracy of a policy.
- **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 the NCDC Glossary which can be found at <http://www.ncdc.gov.sa/Glossary>.

### 2. Purpose

This document is part of the NCDC document set. This is the privacy policy explains what information the NCDC & 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 of all participants in the Saudi National PKI.

### 4. Policy Statement

#### 4.1 General Requirements

- The NCDC Director has responsibility for facilitating the implementation of this policy and the supporting policies and procedures.

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- 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

The 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 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 the 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

## 5. Privacy Statement

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

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### **5.1 Privacy Notice**

The NCDC's privacy policy is designed to assist you in understanding how the NCDC and CSPs collect, use and safeguard 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.

### **5.2 Collection of Data**

The 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 the NCDC, or the entities that are involved in the operation of the NCDC, such as RAs, LRAs, CAs, and Repositories.

### **5.3 Use of Personal Data**

The 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 private. The NCDC and CSPs will use that information only for the purpose of providing PKI services. Your private 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 5.6), unless otherwise required by law, or except as may be necessary for the performance of the NCDC services, for auditing requirements, or as part of the regulatory compliance. The 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, the NCDC and CSPs will take reasonable steps to ensure that inaccurate information is erased or rectified.

### **5.4 Certificate Information**

Notwithstanding the foregoing, information contained in certificates and related certificate status information is not private. The NCDC private Repositories containing proprietary information meant for internal use are only accessible to NCDC-SSC components. Public Repositories containing a Subscriber's name, his National ID or his e-mail address based on the type of certificate if it is name certificate, ID certificate or email certificate respectively, in addition, the Public Repositories containing public key, , certificate expiration date, the status of the certificate, and other identifying information about the Subscriber are accessible by Relying Parties and Subscribers in accordance with the respective CA CP and CPS.

### **5.5 Security of Data**

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

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### 5.6 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 the NCDC legal rights or those of our users.

### 5.7 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 Policies, Roles and Regulations Department.

## 6. Related NCDC Policies and Procedures

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

## 7. Compliance

Compliance with this policy is mandatory. NCDC & CSPs managers must ensure continuous compliance monitoring within their organizations. Compliance with the NCDC Privacy Policy will be a matter for periodic review by Policies, Roles and Regulations Department. Violations of NCDC Privacy Policy and the supporting policies and procedures will result in corrective action by 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 management, Human Resources, and the Legal Department

## 8. Waiver Criteria

This Policy is intended to address the NCDC Privacy requirements. Requested waivers must be formally submitted to the NCDC Policies, Roles and Regulations Department, including justification and benefits attributed to the waiver, and must be approved by the NCDC Director. 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.

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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 in the appendix.

### 9. Executive Owner

The sponsor of this policy is the Policies, Roles and Regulations Department Manager. The Policies, Roles and Regulations Department is responsible for maintenance and accuracy of this policy. Any questions regarding this policy should be directed to NCDC Policies, Roles and Regulations Department.

### 10. Executor(s)

The implementation of this policy is the responsibility of:

- 1 NCDC Compliance Officer.
- 2 CSP Compliance Officer.

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### Appendix A: Policy Waiver Request Form

**Date:** \_\_\_\_\_

**Agency Name:** \_\_\_\_\_

**Agency Requester Name:** \_\_\_\_\_

**Phone Number:** \_\_\_\_\_

**Email Address:** \_\_\_\_\_

**Justification for noncompliance or deviation:**

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**Agency Requester Name:** \_\_\_\_\_

**Signature** \_\_\_\_\_ **Date** \_\_\_\_\_

**Agency Manager Name:** \_\_\_\_\_

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_