

# Privacy Policy (v. 1.2)

for

## Nets eID Broker

by

Signaturgruppen A/S  
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### What is a "broker"?

A broker is an it-system, that technically connect IT-services offered by private enterprises or public entities (a netbank or a government self-service solution by example) to a digital login service (the Danish MitID electronic ID by example).

Signaturgruppen, which is owned 100% by Nets A/S, is offering such a broker, used by many large digital service providers. Our broker is a substantial element in securing, that customers and citizens can log-in securely at theses digital services.

### Dataresponsibility

The brokers role as link between different actors means, that Signaturgruppen fullfills different roles, when it comes to protection of your personal data. These roles are described below:

#### Datacontroller as a MitID broker

Signaturgruppen is data controller when receiving, processing and passing on personal data for end-users of MitID when they log-in at the service providers integrated to our broker. In this context we process the following personal data:

- Persons full name
- Persons age
- Persons date of birth
- Persons MitID user-id (UUID)
- Persons MitID identification means in a session
- Persons social security number (CPR-number, this number is not persisted by Signaturgruppen)
- The digital services used by the person
- The time of log-in

- Certain so called "risk-data" about the end-user, including information about the device used for login, the browser used and network information.
- Risk-data can be used by the broker to make automated decisions on log-in.
- We pass on authentication responses to service providers that (depending on the service provider) contains all or parts of above data.

Our legal basis for this is:

- The Danish MitID act: "Lov om MitID og NemLog-in" (§13 sec. 2, 3 and 5), giving us authority to receive, process and pass on authentication responses to service provider and make automated log-in decisions based on risk-data.

### Sub-processor to Digitaliseringsstyrelsen in relation to MitID

As a MitID broker Signaturgruppen is also a data sub-processor to Digitaliseringsstyrelsen and passes on authentication data and risk-data to the MitID solution at Nets DanID (acting as data processor for Digitaliseringsstyrelsen).

### Data controller for service providers use of our broker

Signaturgruppen is data controller for personal data about users at our service providers (typically employees at the service provider), who via our on-line portal has access to administration of the service providers own integration towards our broker. In this context we process the following personal data:

- Persons full name
- Persons email address
- Persons organizational position within the service provider
- We log the changes, that the person makes to the service providers integration to our broker through our on-line portal.

Our legal basis for this is:

- General Data Protection Regulation) art. 6, sec. 1, f with reference to our legitimate interest in fulfilling our contractual obligations towards our service providers in securing optimal IT-security for our broker.

### Dataprocessor for service providers

Signaturgruppen in a number of areas acts as data processor for our service providers, following their instructions, since we receives on behalf of these, certain personal data and assists in collecting end-user consent to this.

The following personal data and processing is included:

- Social security number (CPR-number is not persisted by Signaturgruppen):
  - Voluntary collection and disclosure of social security number to private service providers.
  - "CPR Match", permitting a private service provider to verify correctness of an end-users social security number.
- "Transaction signing", that can contain personal data of varying character.
- Digital signing of documents, that can contain personal data of varying character.

The service provider with which you log in will either have entered into an agreement with you, will have obtained your consent for us to process your personal data, or will have otherwise secured the necessary basis to use the relevant functions in our broker.

As Signaturgruppen is not data controller for these processing, we must refer here to the specific service provider in relation to being informed of processing authority and in relation to the fulfillment of your rights, cf. the General Data Protection Regulation.

### Data controller for privilege management data

Signaturgruppen is data controller for privilege management data that service providers and Enterprises registers in the NeB privilege management solution.

Service providers registers information about their administrators and attributes that represents privileges in their service. The attributes are shared with participating enterprises.

Enterprises registers information about their administrators and attaches attributes to their employees in order for these to gain privileged access to the relevant service providers webservices. The attributes registered on employees are shared with the service provider that owns the attributes.

The service provider and the enterprises are independent data controller for data received.

Our legal basis for this is:

- General Data Protection Regulation) art. 6, sec. 1, f with reference to our legitimate interest in fulfilling our contractual obligations towards our service providers and participating enterprises.

### Recipients or categories of recipients

In connection with our processing of your personal data, we pass on data to the following recipients:

- The service providers you log in to.
- Enterprises that you as service provider registers relevant attributes for
- Nets DanID, which is the data processor for the Danish Digitization Agency and provider of the MitID solution.
- Nets, which handles the server-operation of our broker.
- NemLog-in, which is a MitID broker for public authorities, which is part of the service of MitID business customers, and which digitally signs documents.

### Where your personal information comes from

The personal data is either collected directly from you or passed on to Signaturgruppen from our service providers, Enterprises or from other players in the MitID infrastructure in accordance with the rules for MitID.

### Storage of your personal information

Signaturgruppen stores and processes your personal information for as long as is necessary for the purpose.

## Your rights

In cases where Signaturgruppen is the data processor, we must refer to the specific service provider in relation to the fulfillment of your rights, cf. the General Data Protection Regulation.

In cases where Signaturgruppen is data controller, we can provide you with information about your rights in compliance with the General Data Protection Regulation:

- **Insight:** You have the right to see the personal information that we have registered about you.
- **Correction:** For the personal information that we have registered about you, you have the right to have incorrect information about yourself corrected.
- **Deletion:** In certain cases, you have the right to have the personal information that we have registered about you deleted.
- **Restriction:** In certain cases, you have the right to have our processing of the personal data that we have registered about you restricted.
- **Objection:** In certain cases, you have the right to object to the processing of the personal data that we have registered about you.
- **Data portability:** This right does not apply to MitID, as the processing takes place in accordance with the MitID Act and NemLog-in.

Often there will be conditions or limitations to these rights. It is therefore not certain that you e.g. have the right to delete your information in the specific case - this will thus depend on the actual circumstances of the processing activities.

If you wish to make use of your rights, please contact the Signature Group's data protection adviser (DPO). Contact information is listed below.

## Data Protection Officer (DPO)

The Signaturgruppen is part of the Nets Group, which has appointed a Data Protection Officer (DPO) for the entire group. If you wish to contact our Data Protection Officer, this can be done as follows:

Nets Group  
Att. DPO  
Lautrupbjerg 10  
2750 Ballerup  
Denmark

email: [dpo@nets.eu](mailto:dpo@nets.eu)

## Complain to the Danish Data Protection Agency

You have the right to lodge a complaint with the Danish Data Protection Agency if you are dissatisfied with the way we process your personal data. You will find the Danish Data Protection Agency's contact

information at [www.datatilsynet.dk](http://www.datatilsynet.dk). You are also welcome to contact our data protection adviser (DPO) as described above.

## Updates to this Privacy Policy

We update this Privacy Policy when we deem it necessary. Changes compared to the previous version will appear in the change history below. If we make changes that are material to the processing of your personal data, we will notify you of such changes and the consequences thereof.

## Changes

Version	Date	Description
1.0		First version
1.1	August 5. 2021	English version and linguistic updates
1.2	December 2022	NeB privileges management introduced