

identity Trust Management AG herein referred to as identity Trust Management Data Protection Statement

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1 Collection and processing of personal data

It is necessary to collect, process or use personal data as part of the identification services and driving license checks provided by identity Trust Management.

In this context, the type and scope of the collection, processing or use of this data depends on respectively applicable legislation and terms of contracts with our business partners in relation to identification services and driving license checks.

identity Trust Management has committed itself to the objective of collecting, process or using as little personal data as possible.

We use your personal data solely for the purposes agreed with our business partners to the extent necessary for the lawful performance of identification services and driving license checks to be performed by us and compliance with applicable quality standards.

Identity Trust Management only collects personal data directly from the person concerned or receives such data from its business partners on an order-related basis within the scope of data processing contracts. identity Trust Management only processes personal data to the extent needed for purposes of lawful identification or a driving license check. No data is collected by third parties.

No additional uses are made of such data, in particular for advertising or market research purposes.

The scope of collection, processing or use of such data to be performed by identity Trust Management is set out in the contract between identity Trust Management and its business partner or provisions of applicable law requiring identity verification or a driving license check in a particular case.

As a rule, this includes the following data in particular:

As part of identity verification based on the German Anti-Money Laundering Act (GwG) and the German Electronic Signature Act (SigG), data generally includes:

Last name

First name

Complete address

Place of birth

Date of birth

Citizenship

If applicable, data from identification documents, such as validity date, issue authority and identification number as proof of the existence of valid, official identification documents.

Depending on the business partner and the process desired by the user, our business partner has also requested

Mobile phone number

E-Mail address

and

Photos/screen shots of the person and the front and back of the identification document as well as an audio recording of the video teleconference

The following data from the driving license is examined in the case of driving license checks depending on the process agreed with our business partner:

Last name

First name

Date of birth

Issue date

Issuing authority

Expiry date

Driving license class valid from

Driving license class valid to

Driving license restrictions

2 Data protection

When processing personal data, identity Trust Management complies with all data protection-related regulations, in particular the provisions of the German Data Protection Act (BDSG) and those of the German Telemedia Act (Trust Management AG).

Persons involved in processing data are prohibited from collecting, processing or using personal data without authorisation (data privacy). Upon commencement of their employment, such persons are obligated to maintain data privacy, in particular pursuant to § 5 BDSG. The data privacy obligation continues to apply following the end of their employment.

In compliance with statutory requirements, identity Trust Management has undertaken technical and organisational measures designed to secure personal data which preclude access by unauthorised third parties.

Such measures are reviewed regularly and adjusted to take changed circumstances into account as necessary.

3 Deletion periods

Following the completion of the identity verification process, we send the data collected to our business partner (your counter-party) on an order-related basis.

Subject to legal retention periods, identity Trust Management will delete your data within the following periods following completion of transmission to our business partner:

All personal data (identity verification data) is deleted within a maximum back-up period of seven days following conclusion of processing and completed transmission to our business partner. Personal data is deleted automatically by deleting the person's identifying attributes from the data set.

Anonymised contract data (business partner, order number, reference number, recipient's address information) is retained in the software for a period of three months following completion of data processing within the operating system in order to be able to understand and respond to any enquiries, complaints and statistics without delays.

The user's business partner will use data transmitted for purposes of fulfilling its statutorily-prescribed identification duties and will store such data pursuant to applicable laws.

The period for which the user's business partner will store this data must be disclosed there or a request must be made for disclosure.

4 COOKIES

Identity Trust Management uses so-called "cookies" in some instances. Cookies are small text files that are stored on your device. Their purpose is to recognise your device upon a later visit to our website or to analyse specific parameters in connection with your use of our website. A distinction must be made between "session cookies" and "permanent cookies". Session cookies are deleted from your device following the end of the respective session. Permanent cookies remain on your device and, in particular, enable recognition of your device upon a subsequent visit to our website. Cookies merely identify the device and do not identify the user. No personal data is stored in connection with the use of cookies. In any event, you may disable the use of cookies in your web browser at any time. However, the deactivation of cookies results in limitations on the use of our website and of the identification service.

5 eTRACKER

This website uses etracker technology (www.etracker.com) to collect and store data for marketing and optimization purposes. Anonymised usage profiles can be generated from these data. Cookies may be used for this purpose. Cookies are small text files which are stored locally in the browser storage of a website visitor. They enable the recognition of the browser on subsequent visits. The data collected with etracker technology will not be used to identify a visitor of the website and will not be aggregated with personal data without the explicit consent of the visitor. The collection and storage of data may be refused by a visitor at any time, at which point no further data will be collected.

6 Disclosure to authorities pursuant to applicable law

identity Trust Management transmits data regarding the identity of a recipient of identity verification only upon request of the lawfully competent authority to the extent doing so is necessary for the prosecution of crimes or administrative offences, or to prevent risks to public safety or order, or to the extent ordered to do so by a court as part of pending proceedings based on applicable regulations in such cases.

This information is exclusively provided and documented by the data protection officer. The data protection officer examines whether the agency requesting information is the competent authority in such cases and whether the request satisfies legal requirements. The requesting authority is required to inform the data subject of such transmittal as soon as the performance of legal functions is not impaired thereby or in cases where the interests of the data subject prevail.

7 Contact for questions related to data protection

Our data protection officer is happy to assist you with any data protection-related issues. Contact is possible as follows:

By e-mail: datenschutz@identity.tm

By snail mail:

identity Trust Management AG

- Data protection officer-

Lierenfelder Straße 51

D-40231 Düsseldorf.

The management board is responsible for the contents hereof

Johannes Meerloo, Uwe Stelzig