

## **identity Trust Management AG herein referred to as identity.™ Data Protection Statement**

- 1 Collection and processing of personal data
- 2 Data protection
- 3 Deletion periods
- 4 COOKIES
- 5 USE OF GOOGLE ANALYTICS
- 6 Disclosure to authorities pursuant to applicable law
- 7 Contact for questions related to data protection

### **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.™**.

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.™** 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.™** 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.™** 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.™** is set out in the contract between **identity.™** 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.™** 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 (TMG).

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.™** 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.™** 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.™** 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 USE OF GOOGLE ANALYTICS

The **identity**.™ website uses Google Analytics. This is a web analysis service provided by Google, Inc., USA ("Google"). Google Analytics uses cookies that enable the analysis of your use of our website. Information on the use of this website created through the use of cookies is generally transmitted to a Google server in the United States and stored there. In the event IP anonymization is activated on this website, your IP address will be abbreviated by Google within the Member States of the European Union or in other Contracting States to the Agreement on the European Economic Area before transmittal. The full IP address will only be transmitted to a Google server in the United States and abbreviated there in exceptional cases. Google will use this information on behalf of the operator, in order to analyse your use of this website, in order to prepare reports regarding on-line activities for website operators and in order to provide additional services associated with the use of this website and web usage. Google may also transmit this information to third parties to the extent legally required to do so or to the extent third parties process data on behalf of Google. In no event will Google associate your IP address without data held by Google. You may prevent the storage of cookies by using the appropriate settings on your browser. However, please note that if you do so, you may not be able to use all of the functions of this website to their full extent. In addition, you may prevent the collection of data generated by the cookie related to your use of the website (including your IP address) by Google and the processing of such data by Google by downloading and installing the browser plug-in that may be found at the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>. By using this website, you consent to having data collected about you processed by Google in the manner and for the purposes described above. You may prevent all forms of user analysis on this website in future by using a so-called "opt-out cookie". Analysis of your usage will not be possible as long as you do not delete this cookie from your browser. You likewise have the ability to re-activate web analysis for this website.

## 6 Disclosure to authorities pursuant to applicable law

**identity**.™ 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](mailto: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