



**Privacy policy
of
IDnow GmbH (formerly identity Trust Management GmbH)**

V 2.8_2023_04_11

Index

1.	General	3
2.	Collection, processing and use of personal data within the framework of the identification process or driving licence test.	3
2.1	Identity verification.....	4
3.	Rights as a data subject	5
3.1	Right to information	6
3.2	Correction & deletion and restriction of processing	6
3.3	Revocation of consent	6
3.4	Contradiction	7
3.5	Right to data portability:	7
3.6	Automated decision making (including profiling).....	7
3.7	Voluntariness of data provision	7
3.8	Legitimate interests	7
3.9	Transmission of data abroad.....	8
3.10	Exercise of the right of appeal	8
4.	Storage of access data	8
5.	Data protection.....	9
6.	Deletion periods.....	9
7.	Cookies.....	10
8.	Use of Google Fonts.....	10
9.	Disclosure to authorities on a legal basis	11
10.	Contacting	11
11.	Amendment of the data protection notice	11

1. General

The protection of your personal information is a top priority for IDnow GmbH. Of course, we comply with the applicable data protection laws and would like to inform you comprehensively about the handling of your data with the following data protection information.

The responsible party within the meaning of the General Data Protection Regulation ("DS-GVO") and other national data protection laws of the member states as well as other data protection regulations is:

IDnow GmbH
Auenstr. 100
80469 Munich Germany
E-mail: info@idnow.de

Represented by:

Andreas Bodczek (CEO), Joseph Lichtenberger (CFO), Armin Bauer (Co-Founder & CTO),

Data Protection Officer:

Dr. Sebastian Kraska IITR Datenschutz GmbH

If you have any questions about this privacy policy, please contact our support team by e-mail or use our contact form.

2. Collection, processing and use of personal data within the framework of the identification process or driving licence test.

Within the scope of the identification services and driving licence tests carried out by IDnow GmbH, it is necessary to collect, process or use personal data.

The type and scope of the collection, processing or use of this data depends on the respective applicable legal regulations and the contractual agreements with the cooperation partners (clients) in relation to the identification service and/or driving licence test. In this context, IDnow GmbH acts as a processor pursuant to Art. 28 f. Data Protection Regulation (DSGVO).

IDnow GmbH is committed to the goal of collecting, processing or using as little personal data as possible.

IDnow GmbH uses your personal data exclusively for the purpose agreed with the cooperation partners, insofar as this is necessary for the identification service or driving licence test to be provided by IDnow GmbH and for compliance with the quality standards.

IDnow GmbH collects personal data only directly from the data subject himself or receives them on an order-related basis within the framework of data processing agreements (AVV) from the respective cooperation partners. Data collection, processing or use by third parties only takes place with the purpose-related approval of the cooperation partner for this identification/driver's licence check.

Any further use, in particular for advertising or market research purposes, will not take place.

The scope of the collection, processing or use of this data to be carried out by IDnow GmbH is defined in the corresponding contractual relationship of IDnow GmbH with your cooperation partner and the legal requirements which demand an identity check or driving licence check in individual cases.

2.1 Identity verification

As a rule, this is the following data:

- Last name
- First name(s)
- Street address
- House number
- Postcode
- Town
- Place of birth
- Date of birth
- Nationality
- the data and type of identity document, such as the validity date, the date of issue, the issuing authority, and the identity document number as proof of the existence of a valid, official identity document.

Depending on the contracting party, legal and regulatory obligations and the process requested by the user, this also concerns the

- Mobile phone number and/or
- E-mail address.
-

as well as

- Photographs/screenshots of the person and the front and back of the identification document
- and an audio as well as a visual recording of the video conference

By agreeing to this privacy policy, the user expressly declares his consent to the collection, use and disclosure of this data, in particular with regard to the photos/screenshots (opto-electronic ID copy) of the ID document used for identification, as well as the audio and visual recordings to the cooperation partner.

2.2 Driver's license check

Within the framework of driver's license check, the following data of the driving license are checked according to the procedure agreed with the cooperation partner:

- Surname
- First name(s)
- date of birth
- Date of issue
- Issuing authority
- Expiry date
- Driving license class valid from
- Driving license class valid until
- Driving license class restrictions

By agreeing to this privacy policy, the user expressly declares his or her consent to the collection, use and disclosure of the identity and driving license verification data, the photos/screenshots of the driving license presented and of his or her person to the cooperation partner in the context of establishing ownership of an admissible, valid driving license.

3. Rights as a data subject

According to the European General Data Protection Regulation (DSGVO), every user has the right to

- the right to information according to Article 15 DSGVO,
- the right to rectification according to Article 16 DSGVO,
- the right to erasure according to Article 17 DSGVO,
- the right to restriction of processing under Article 18 of the GDPR,
- the right to object under Article 21 of the GDPR, and
- the right to data portability under Article 20 of the GDPR.

The GmbH answers the user's queries in accordance with the legal requirements. In case of questions, the user can also always contact the customer service of IDnow GmbH.
In addition, there is a right of appeal to a data protection supervisory authority (Article 77 DSGVO).

This is how the rights can be exercised:

3.1 Right to information

If you have any questions regarding data protection, please contact the data protection officer of IDnow GmbH.

These contact details are also available for revoking or deleting consent given to IDnow GmbH for the collection, processing or use of data.

It is possible to contact:

IDnow GmbH Auenstraße 100

80469 Munich

E-mail: support@mail.idnow.de

3.2 Correction & deletion and restriction of processing

Every user has the right to have his or her data corrected and/or deleted, provided that it has not already been deleted automatically. However, since IDnow GmbH processes the user's data on behalf of a cooperation partner (your contractual partner⁹), this partner must be contacted with regard to the correction, deletion or restriction.

3.3 Revocation of consent

Every user can revoke his or her consent once given at any time. This also applies to the revocation of declarations of consent that were given before the EU General Data Protection Regulation came into force, i.e. before 25 May 2018. It should be noted that the revocation only takes effect for the future. Processing that took place before the revocation is not affected. However, since IDnow GmbH only processes the user's data on behalf of a cooperation partner, the user can only revoke his/her consent vis-à-vis the respective cooperation partner.

3.4 Contradiction

In accordance with Art. 21 DSGVO, every user also has the right, and where applicable, the right to object at any time to the processing of personal data relating to them which is carried out on the basis of Art. 6 (1) f DSGVO (data processing on the basis of a balance of interests). If the user has any questions, he or she can also contact the customer service.

3.5 Right to data portability:

Every user has the right to receive the personal data concerning you that has been provided to IDnow GmbH by a cooperation partner in a structured, common and machine-readable format from the respective cooperation partner and has the right to transfer this data to another party, provided that it has not already been deleted. The user has this right if the processing of his/her data is based on consent pursuant to Art. 6 para. 1 a DSGVO, Art. 9 para. 2 a DSGVO or on a contract pursuant to Art. 6 para. 1 b DSGVO. When exercising this right, the user also has a right to obtain that his or her data concerned be transferred directly from the cooperation partner to another responsible party, insofar as this is technically feasible.

If this right is to be exercised, then the user must contact the respective cooperation partner.

3.6 Automated decision making (including profiling)

IDnow GmbH does not use fully automated decision-making pursuant to Art. 22 DSGVO.

3.7 Voluntariness of data provision

Insofar as data processing is based on a user's consent, the provision of his or her data is entirely voluntary and can be revoked by the user at any time in accordance with the information below. In some cases, however, IDnow GmbH requires the data to provide the contractually guaranteed services:

3.8 Legitimate interests

Occasionally, IDnow GmbH also processes the data of our users on the legal basis of Art. 6 (1) f DSGVO. In processing this data, IDnow GmbH pursues the following legitimate interests in this case, unless otherwise stated below:

- the improvement of our offer
- the protection against misuse
- for internal statistical purposes

3.9 Transmission of data abroad

IDnow GmbH processes user data exclusively in secure data centres in Europe.

3.10 Exercise of the right of appeal

For data protection questions on the subject of telecommunications can:

The Federal Commissioner for Data Protection and Freedom of Information (BfDI) Husarenstr.30
53117 Bonn

Telephone: 0228-997799-0
Fax: 0228-997799-5550
E-mail: poststelle@bfdi.bund.de

can be contacted.

For data protection questions concerning the website of IDnow GmbH or other products that are not telecommunication-related, the

Bavarian State Office for Data Protection Supervision (BayLDA) Promenade 18
91522 Ansbach
Postal address P.O. Box 1349
91504 Ansbach Germany

Telephone: +49 (0) 981 180093-0
E-mail: poststelle@lda.bayern.de

can be contacted.

4. Storage of access data

When accessing the website of the GmbH, information is automatically transmitted by the internet browser for technical reasons (e. g. IP address, browser type, language set, date and time) and used and statistically evaluated as far as necessary for the procedure.

To set up the video conference, it is necessary to transmit the IP address of the user to TokBox Inc (<https://tokbox.com>). This data is not assigned to any natural person and is then regularly deleted.

Visitors to the website have the right to request information free of charge about the

personal data stored about them. In addition, they have the right to correct, block and delete this personal data in accordance with the statutory provisions.

5. Data protection

IDnow GmbH observes all data protection regulations when processing personal data.

Persons employed in data processing are prohibited from collecting, processing or using personal data without authorisation (data secrecy). The secrecy of telecommunications applies to the content of telecommunications and the circumstances surrounding them, in particular the fact whether someone is or was involved in a telecommunications process. The secrecy of telecommunications also extends to the details of unsuccessful attempts to make a connection. These persons are obliged to observe data secrecy and telecommunications secrecy in accordance with section 88 of the Telecommunications Act when they take up their duties. The obligations shall continue to exist after termination of their activity.

In accordance with the legal requirements, IDnow GmbH has taken appropriate technical and organisational measures to secure personal data, which exclude access by unauthorised third parties. These are regularly reviewed and - if necessary - adapted to new circumstances.

6. Deletion periods

After successful completion of the identification process, IDnow GmbH will transmit the collected data to the corresponding cooperation partner (the user's contractual partner) on an order-related basis.

Subject to legal retention periods, IDnow GmbH will delete the user's data after successful transmission to its corresponding cooperation partner within the following periods.

All personal data (identity verification data) will be deleted after completion of processing and successful transmission to the cooperation partner with a maximum backup period of 7 days. The deletion of the personal data is automated by deleting the identifiers of the person from the data set.

The depersonalised order data (cooperation partner, order number, reference number) are retained in the software for a period of 3 months after completion of the processing in the operating system in order to be able to trace and evaluate possible enquiries, complaints and statistics without loss of time.

The contractual partner of the user will use the transmitted data for the fulfilment of its statutory identification obligations and store it in accordance with the statutory provisions. The contractual partner is exclusively responsible for this.

The duration of the storage of the data with the contractual partner of the user is to be disclosed or requested there.

Any further requests for the deletion of data must be made by the data subject to the responsible party. For the data subject, the responsible body is the contractual partner (application partner) of the user for whom he has his identity or driving licence checked by IDnow GmbH.

IDnow GmbH is also available for data protection-related questions with the contact details mentioned at the end.

7. Cookies

IDnow GmbH partly uses so-called "cookies", which are technically necessary to enable the operation of the website. These are small text files that are stored locally on your end device. They are used to recognise the end device used by the user when he/she visits our website again or to analyse individual parameters in connection with the use of our website.

A distinction is made between so-called session cookies and so-called permanent cookies. Session cookies are deleted from the user's terminal device after the end of the respective session. Persistent cookies remain on the user's device and are used in particular to recognise the user's device when the user logs on again.

user's device when logging on to the IDnow GmbH website again. Cookies only identify the device, but not the person of the user. No personal data is stored in connection with the use of cookies.

8. Use of Google Fonts

The websites of IDnow GmbH use Google Fonts. All Google Fonts are exclusively provided locally, i.e. via our servers, and not by Google itself. Google Fonts are used in the interest of a uniform and appealing presentation of the online offers. This represents a legitimate interest within the meaning of Art. 6 Para. 1 lit. f DSGVO.

9. Disclosure to authorities on a legal basis

IDnow GmbH shall only transmit data on the identity of a data subject within the scope of identification to the legally competent authorities at the express request of an authority entitled to receive information, insofar as this is necessary for the prosecution of criminal offences or administrative offences, for the prevention of threats to public safety or order or insofar as courts explicitly order this within the scope of pending proceedings in accordance with the provisions applicable for this purpose.

This information shall be provided and documented exclusively by the Data Protection Officer. The Data Protection Officer shall check whether the body requesting the information is the competent or authorised body/authority and whether the request meets the legal requirements. The requesting authority shall inform the data controller of the transfer of the data as soon as this no longer impairs the performance of the statutory tasks or if the interest of the data controller in being informed prevails.

10. Contacting

When contacting IDnow GmbH (e.g. via contact form or e-mail), the user's details are stored for the purpose of processing the enquiry and in the event that follow-up questions arise.

11. Amendment of the data protection notice

Please note that this data protection notice may be changed at any time in compliance with the applicable data protection regulations. The version available at the time of your visit always applies.

If you still have questions, please also feel free to contact us at the above addresses.

Responsible for the content

IDnow GmbH
Auenstr. 100
80469 München