



Privacy Policy
of
identity Trust Management AG

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1. General

At identity Trust Management, the protection of your personal data is our top priority. We comply with the relevant data protection laws and would like to inform you comprehensively about the handling of your data with the following privacy policy. The responsible controller is the management:
Johannes Meerloo, Uwe Stelzig

identity Trust Management AG Telephone: +49 211 68 77 3-0
Lierenfelder Straße 51 E-Mail: kontakt@identity.tm
40231 Düsseldorf

2. The collection, processing and use of personal data as part of the identification process or driving license verification

Identification services and driving license examinations carried out by identity Trust Management AG require that personal data be collected, processed or used.

The type and scope of the collection, processing or use of this data depends on the applicable legal regulations and the contractual agreements with the cooperation partners (clients) with regard to the identification service and/or driving license verification. identity Trust Management AG acts as a commissioned data processor according to § 62 Federal Data Protection Act (BDSG) or Art. 28 f. General Data Protection Regulation (GDPR).

Identity Trust Management AG has committed itself to the goal of collecting, processing or using as little personal data as possible.

identity Trust Management AG uses your personal data exclusively for the purpose agreed with the cooperation partners, insofar as this is required for the legally compliant identification service or driving license verification to be performed by identity Trust Management AG and for compliance with quality standards.

identity Trust Management AG collects personal data only directly from the data subject or receives it on a contract-related basis in the context of data processing agreements (ADV) from the respective cooperation partners. Data collection, processing or use by third parties does not take place.

Any further use, especially for purposes of advertising or market research, does not take place.

The scope of the collection, processing or use of this data by identity Trust Management AG is defined in the respective contractual relationship of identity Trust Management AG with your cooperation partner and the legal requirements, which require an identity check or driving license verification in individual cases.

2.1. Identity verification

As part of an identity verification under the law on the detection of profits from serious crimes (Money Laundering Act - GwG), the Trust Service Act (VDG) and the Telecommunications Act (TKG), these are usually the following data:

- Last name
- First name(s)
- Street
- House number
- Post code
- Place
- Place of birth
- Date of birth
- Nationality

- The data and type of the identification document, such as the valid date of issue, the issuing authority and the identification number as proof of the existence of a valid, official identification document

Depending on the contractual partner, legal and regulatory obligations and the process desired by the user, this also includes

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

As well as

- Photos/screenshots of the person and the front and back of the ID card
- And a sound and a visual record of the videoconference

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

2.2. Driving license verification

In the context of driving license verifications, the following data from the driving license is verified, depending on the procedure agreed with the cooperation partner:

- Last name
- 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 agrees to the collection, use and transfer of the identity and driving license verification data, the photos/screenshots of the presented driving license and their person to the co-operation partner as part of the determination of ownership of a permitted, valid driving license.

3. Data subject rights

Every user has the following rights according to the European General Data Protection Regulation (GDPR):

- The right to information pursuant to Art. 15 GDPR,
- The right to correction pursuant to Art. 16 GDPR,
- The right to deletion pursuant to Art. 17 GDPR,
- The right to restriction of processing pursuant to Art. 18 GDPR,
- The right to object pursuant to Art. 21 GDPR and
- The right to data portability pursuant to Art. 20 GDPR.

identity Trust Management AG answers user inquiries according to the legal requirements. If you have any questions, users can always contact customer service at identity Trust Management AG. In addition, there is a right of appeal to a data protection supervisory authority (Art. 77 GDPR in conjunction with §19 BDSG).

The rights and be exercised as follows:

3.1. Right to information

If you have any questions about data protection issues, the data protection officer of identity Trust Management AG would be pleased to assist you.

Their contact details are also available for the revocation or deletion of consent given to identity Trust Management AG for the collection, processing or use of data.

Contact:

by e-mail at: datenschutz@identity.tm

by post at: identity Trust Management AG - Data Protection Officer - Lierenfelder Straße 51 D - 40231 Düsseldorf

3.2. Correction & deletion and restriction of processing

Every user has the right to have their data corrected and/or deleted, if it has not already been deleted automatically. However, because identity Trust Management processes the data of the user on behalf of a cooperation partner, it must be contacted with regard to the correction, deletion or restriction.

3.3. Revocation of consent

Every user can at any time revoke consent that has been granted. This also applies to the revocation of declarations of consent issued prior to the validity of the EU General Data Protection Regulation, i.e. before 25 May 2018. It should be noted that the revocation only applies for the future. Processing that occurred before the revocation is not affected. However, because identity Trust Management processes the data of the user only on behalf of a cooperation partner, the user can only revoke their consent with the respective cooperation partner.

3.4. Objection

Every user also has, pursuant to Art. 21 GDPR, the right at any time if applicable to object to the processing of personal data, which takes place on the basis of Art. 6 (1) (f) GDPR (data processing based on a balance of interests). If you have questions, users can also contact the customer service.

3.5. Right to data portability:

Every user has the right to have their personal data, which was provided to identity Trust Management AG by a cooperation partners, provided to them in a structured, common and machine-readable format by the respective cooperation partner and they have the right to transfer this data to another party, if it has not already been deleted. The user has this right if the processing of their data is based on consent pursuant to Art. 6 (1) (1) GDPR, Art. 9 (2) (a) GDPR or a contract pursuant to Art. 6 (1) (b) GDPR. In exercising this right, the user also has the right to obtain that their data in question be transferred directly from one cooperation partner to another controller, as far as this is technically feasible.

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

3.6. Automated decision making (including profiling)

Fully automated decision making pursuant to Art. 22 GDPR does not take place on the part of the identity Trust Management AG.

3.7. Voluntary data provision

As far as data processing is based on the consent of a user, the provision of their data is entirely voluntary and can be revoked at any time by the user in accordance with the information below. In

some cases, identity Trust Management AG may however require the data for the provision of the contractually guaranteed services within the general terms and conditions.

3.8. Legitimate interests

Occasionally identity Trust Management AG also processes the data of our users on the basis of Art. 6 (1) (f) GDPR. When processing this data, identity Trust Management AG pursues in this case the following legitimate interests unless otherwise stated below:

- Improvement of our offer
- Protection against abuse
- For internal statistical purposes

3.9. Transmission of data abroad

identity Trust Management AG processes user data exclusively in secure data centres in Germany.

3.10. Exercise of the right of appeal

You may contact the following for data protection issues around the topic of telecommunications:

The Federal Commissioner for Data Protection and Freedom of Information (BfDI) Husarenstr. 30
53117 Bonn
Phone: 0228-997799-0
Fax: 0228-997799-5550
E-mail: poststelle@bfdi.bund.de

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For data protection questions around the web presence of identity Trust Management AG or other products that are not telecommunications-related, you may contact the Federal Commissioner for Data Protection and Freedom of Information North Rhine-Westphalia Kavalleriestr. 2 - 4 40213 Düsseldorf

Phone: 0211-38424-0 Fax: 0211-38424-10 E-mail: poststelle@ldi.nrw.de

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4. Storage of access data

For technical reasons, when accessing the identity Trust Management AG website, information is automatically transmitted via the Internet browser (e.g. IP address, browser type, set language, date and time) and, if necessary, used for the procedure and statistically evaluated. To set up the videoconference, it is necessary to transfer the user IP address to TokBox Inc. (<https://tokbox.com>). This data is not assigned to a natural person and is deleted regularly.

Visitors to the website have the right to obtain information about the personal data stored about them free of charge upon request. In addition, they have a right to correction, blocking and deletion of this personal data in accordance with statutory provisions.

5. Data protection

identity Trust Management AG complies with 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 content of telecommunications and their specific circumstances, in particular the fact of whether someone is or has been involved in a telecommunications transaction, is subject to telecommunications secrecy. Telecommunications secrecy also extends to the specific circumstances of unsuccessful attempts at connection. These persons are obligated to data secrecy in particular under § 5 Federal Data Protection Act and secrecy of telecommunications according to § 88 Telecommunications Act when taking up their duties. These obligations continue even after the termination of their duties.

In accordance with legal requirements, identity Trust Management AG has taken appropriate technical and organisational measures to safeguard personal data, which exclude access by unauthorised third parties. They are regularly reviewed and – if necessary – adapted to new circumstances.

6. Deletion periods

Upon successful completion of the identification, identity Trust Management AG will transfer the collected data to the corresponding cooperation partner (the contract partner of the user).

Subject to legal retention periods, identity Trust Management AG will delete the data of the user after successful transmission to their corresponding cooperation partner within the following periods:

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

The remaining order data (cooperation partner, order number, reference number, address data of the recipient) will be kept in the software for 3 months after completion of the processing in the operating system in order to be able to follow and evaluate any inquiries, complaints or statistics without loss of time.

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

The duration of the storage of the data by the contract partner of the user is to be announced by them or to be inquired about with them.

Any further requests for the deletion of data must be submitted by the data subject to the responsible party (§ 3 (7) BDSG). The responsible party for the data subject is the contractual partner (contract partner) of the user for whom the data subject allows their identity or driving license to be verified through identity Trust Management AG.

identity Trust Management AG is also available under the contact data mentioned at the end for data protection issues.

7. Cookies

identity Trust Management AG sometimes uses so-called “cookies”. These are small text files that are stored locally on your device. They are used to recognise the user’s device when revisiting our website or to analyse individual parameters in connection with the use of our website.

A distinction can be made between so-called session cookies and so-called persistent cookies. Session

cookies are deleted at the end of each session from the user's device. Persistent cookies remain on the device of the user and serve in particular for the recognition of the device of the user when logging in again on the website of identity Trust Management AG. Cookies identify only the device, not the person of the user. Storage of personal data does not take place in connection with the use of cookies.

In addition, cookies are analysed by technologies of etracker GmbH (<https://www.etracker.com>) for statistical and optimisation purposes. Usage profiles can be created under a pseudonym from this data. Cookies can be used. Cookies are small text files stored locally in the cache of the site visitor's Internet browser. Cookies enable recognition of the Internet browser. The data collected with etracker technologies will not be used to personally identify the visitor to this website and will not be merged with personal data about the bearer of the pseudonym without the specific consent of the data subject. The data collection and storage can be objected to at any time with effect for the future.

The data collection and storage can be objected to at any time with effect for the future.

8. Use of Facebook social plugins

The website of identity Trust Management AG uses social plugins ("plugins") of the social network facebook.com, which is operated by Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbor, Dublin 2, Ireland ("Facebook"). The plugins are recognisable by one of the Facebook logos (white "f" on blue tile, the terms "Like", "Like" or a "thumbs up" sign) or are marked with the addition "Facebook Social Plugin". The list and appearance of Facebook social plugins can be viewed here: <https://developers.facebook.com/docs/plugins/>.

When a user visits a web page of this offer which contains such a plugin, their browser establishes a direct connection to the Facebook servers. The content of the plugin is transmitted by Facebook directly to your browser and incorporated by it into the website. Identity Trust Management AG therefore has no influence on the amount of data that Facebook collects with the help of this plugin and therefore informs its users accordingly to the best of its knowledge:

By integrating the plugins, Facebook receives the information that a user has accessed the corresponding page of the offer. If the user is logged in to Facebook, Facebook can assign the visit to their Facebook account. If users interact with the plugins, for example, by pressing the Like button or leaving a comment, the corresponding information is transmitted from your browser directly to Facebook and stored there. If a user is not a member of Facebook, there is still the possibility that Facebook will find out and save their IP address. According to Facebook, only an anonymous IP address is stored in Germany.

The purpose and scope of the data collection and the further processing and use of the data by Facebook as well as the related rights and setting options to protect the privacy of users can be found in the privacy policy of Facebook: <https://www.facebook.com/about/privacy/>.

If a user is a Facebook member and does not want Facebook to collect data about them via this offer and associate it with their member data stored on Facebook, they must log out of Facebook before visiting the website. Other settings and objections regarding the use of data for promotional purposes are possible within the Facebook profile settings: <https://www.facebook.com/settings?tab=ads>.

9. Use of XING share buttons

identity Trust Management AG website uses the "XING Share Button". When this website is accessed, a short-term connection is established via the user's browser to servers of XING SE ("XING") with which the "XING Share Button" functions (in particular the calculation/display of the counter value) are carried out. XING does not store any personal data of the user when visiting this website. In particular, XING does not store any IP addresses. There is also no evaluation of your usage behaviour via the use of cookies in connection with the "XING Share Button". The current data protection information regarding the "XING Share Button" and additional information can be accessed by the user on this website: https://www.xing.com/app/share?op=data_protection.

10. Use of LinkedIn buttons:

In addition, the users of the identity Trust Management AG's website will find plugins from the social network LinkedIn or LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, United States (hereinafter referred to as "LinkedIn"). The plugins of LinkedIn can be recognised by the user via the corresponding logo or the "Recommend Button". The user must note that the plugin establishes a connection between the user's Internet browser and the LinkedIn server when visiting this website. LinkedIn is informed that this website has been visited with the IP address of the user. If the user clicks the "Recommend Button" of LinkedIn and at the same time is logged into their account at LinkedIn, they have the opportunity to link content from this website to their profile page with LinkedIn. The user allows LinkedIn to assign their visit to this website to the user or their user account. The user should be aware that identity Trust Management AG is not aware of the content of the transmitted data or its use by LinkedIn.

Further details on the collection of data and the legal options of the user as well as setting options can be found on LinkedIn. These are available at

http://www.linkedin.com/static?key=privacy_policy&trk=hb_ft_priv.

11. Use of Google Fonts

The websites of identity Trust Management AG use Google Web Fonts. These are provided by Google Inc. The use of Google Web Fonts takes place in the interest of a uniform and attractive presentation of online offers. As part of the use, user-related data, such as the IP address, is transferred to Google. When visiting the web page, the browser loads the required web font into the browser cache. This is necessary so that the browser can display a visually improved display of the texts. If the browser does not support this feature, a default font of the computer will be used for display. This constitutes a legitimate interest within the meaning of Art. 6 (1) (f) GDPR.

12. Transmission to authorities on a legal basis

identity Trust Management AG transmits data regarding the identity of a data subject as part of the identification only at the express request of a competent authority to the legally competent authorities, as far as necessary for the prosecution of crimes or misdemeanors, to ward off threats to public safety or order or to the extent that courts explicitly order this in pending proceedings in accordance with the provisions applicable thereto.

This information is provided and documented exclusively by the data protection officer. The data protection officer checks whether the body requesting information is the responsible or authorised body/authority and whether the request meets the legal requirements. The requesting authority shall notify the owner of the transfer of the data as soon as it no longer undermines the exercise of its legal duties or if the owner's interest in the data is greater.

13. Contact

When contacting identity Trust Management AG (for example, by contact form or e-mail), the details of the user are stored in order to process the request as well as in the event that follow-up questions arise.

14. Change of privacy policy

Please note that this privacy policy may be changed at any time in compliance with the applicable data protection regulations. The version available at the time of your visit is always the valid version. If you have any questions, you can also contact us at the above addresses.