



**Privacy Policy of
identity Trust Management GmbH**

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1. General

For identity Trust Management, the protection of your personal information has top priority. Of course, we comply with the relevant data protection laws and would like to inform you comprehensively about the handling of your data with the following data protection information. The management is responsible for this.

identity Trust Management GmbH
Auenstr. 100
80469 München

Phone: +49 211 68 77 3-0
E-Mail kontakt@identity.tm

2. Collection, Processing and Use of Personal Data within the Framework of the Identification Process or Driver's License Examination

In the context of the identification services and driving license tests performed by identity Trust Management 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 applicable legal regulations and the contractual agreements with the cooperation partners (clients) in relation to the identification service and/or driving license test. In this context, identity Trust Management GmbH acts as a processor in accordance with Art. 28 f. Data Protection Regulation (DSGVO).

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

identity Trust Management GmbH uses your personal data exclusively for the purpose agreed upon with the cooperation partners, as far as this is necessary for the legally compliant identification service or driver's license check to be provided by identity Trust Management GmbH and the compliance with the quality standards.

identity Trust Management GmbH only collects personal data directly from the data subject or receives it on an order-related basis from the respective cooperation partners within the framework of data processing contracts (ADV). No data is collected, processed or used by third parties.

Any use beyond this, in particular 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 GmbH results from the respective contractual relationship between identity Trust Management GmbH and your cooperation partner as well as from the legal provisions.

GmbH to your cooperation partner and the legal provisions that require an identity or driver's license check in individual cases.

2.1. Identity Verification

In the context of an identity check pursuant to the Act on the Tracing of Profits from Serious Crimes (Money Laundering Act - GwG), the Confidential Services Act (VDG) or the Telecommunications Act (TKG), this usually includes the following data:

- Name
- First name(s)
- Street address
- House number
- Postal code
- City
- Place of birth
- Date of birth
- Nationality
- the data and the type of the 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 may also include the

- mobile phone number and/or
- e-mail address.

- As well as
- Photos/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 consents 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.

In the identity smartID procedure

- mobile phone number and/or
- e-mail address.

are transferred to Verimi GmbH, Oranienstraße 91, 10969 Berlin, to check whether a Verimi account is available.

2.2. Licence Check

Within the framework of driver's license tests, depending on the procedures agreed with the cooperation partner, the following data of the driver's license are checked:

- Name

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

By agreeing to this privacy policy, the user expressly consents to the collection, use and transfer of the identity and driver's license verification data, photos/screenshots of the driver's license presented and of his or her person to the cooperation partner in the context of establishing ownership of a valid, admissible driver's license.

3. Rights

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

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

identity Trust Management GmbH will answer the User's requests in accordance with the legal requirements. In case of questions, the user can also always contact the customer service of identity Trust Management GmbH.

In addition, there is a right of appeal to a data protection supervisory authority (Article 77 DSGVO).

3.1. Right to Information

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

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

It is possible to contact us

by e-mail: datenschutz@identity.tm

by mail: identity Trust Management GmbH, Lierenfelder Straße 51, 40231 Düsseldorf

3.2. Correction, Deletion and Restriction of Processing Data

Every user has the right to have his or her data corrected and/or deleted, unless it has already been deleted automatically. However, since identity Trust Management processes the User's data on behalf of a cooperation partner, the latter shall be contacted with regard to rectification, deletion and/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 applicability of the EU General Data Protection Regulation, i.e. before May 25, 2018, have been granted. 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 identity Trust Management only processes the User's data on behalf of a cooperation partner, the User can only revoke his consent vis-à-vis the respective cooperation partner.

3.4. Objection

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 in question that is carried out on the basis of Art. 6 (1) f DSGVO (data processing on the basis of a balance of interests). In case of questions, the user can also contact the customer service.

3.5. Right to Data Portability

Every user has the right to receive the personal data concerning you, which has been provided to identity Trust Management 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, if it has not already been deleted. The user has this right if the processing of his data is based on consent according to Art. 6 para. 1 a DSGVO, Art. 9 para. 2 a DSGVO or on a contract according to Art. 6 para. 1 b DSGVO. When exercising this right, the user also has a right to obtain that his or her relevant data is 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. Automatisierte Entscheidungsfindung (einschl. Profiling)

A fully automated decision making according to Art. 22 DSGVO does not take place on the part of identity Trust Management GmbH.

3.7. Voluntariness of the Provision of Data

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 instructions below. In some cases, however, identity Trust Management GmbH needs the data to provide the contractually guaranteed services within the framework of the GmbHB.

3.8. Legitimate Interests

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

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

3.9. Transmission of Data Abroad

identity Trust Management GmbH processes user data exclusively in secure data centers in Europe.

3.10. Exercise of the Right of Appeal

For data protection issues relating to 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 regarding the identity Trust Management GmbH website or other products that are not telecommunication related, the

Bavarian State Office for Data Protection Supervision (BayLDA) Promenade 18
91522 Ansbach

Postal address

PO Box 1349
91504 Ansbach Germany

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

can be contacted.

4. Storage of Access Data

When accessing the identity Trust Management GmbH website, information is automatically transmitted by the internet browser for technical reasons (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 video conference, it is necessary to transmit the user's IP address to TokBox Inc. (<https://tokbox.com>). This data is not assigned to any natural person and is subsequently deleted on a regular basis.

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

5. Data Privacy

identity Trust Management GmbH complies with all data protection regulations when processing personal data.

The persons employed in data processing are prohibited from collecting, processing or using personal data without authorization (data secrecy). The content of telecommunications and its detailed circumstances, in particular the fact whether someone is or was involved in a telecommunications process, are subject to telecommunications secrecy. The secrecy of telecommunications also extends to the details of unsuccessful connection attempts. These persons are obliged to observe data secrecy and telecommunications secrecy in accordance with § Section 88 of the Telecommunications Act. These obligations shall continue to apply after the termination of their activities. In accordance with legal requirements, identity Trust Management GmbH has taken appropriate technical and organizational measures to secure personal data in order to prevent access by unauthorized third parties. These measures are reviewed regularly and - if necessary - adapted to new circumstances.

6. Deletion Deadlines

After successful completion of the identification process, identity Trust Management 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, identity Trust Management 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. Deletion of personal data is automated by deleting the person's identifiers from the data set.

The depersonalized order data (cooperation partner, order number, reference number, address data of the recipient) are kept in the software with a period of 3 months, after completion of processing in the operating system, in order to be able to trace and evaluate possible inquiries, complaints and statistics without loss of time.

The contractual partner of the user will use the transmitted data for the fulfillment 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 announced there or to be inquired.

Any further requests for deletion of the data must be made by the data subject to the responsible party. For the data subject, the data controller is the contractual partner (application partner) of the user for whom identity Trust Management GmbH verifies his identity or driver's license.

identity Trust Management GmbH is also available for questions regarding data protection with the contact data mentioned at the end.

7. Cookies

identity Trust Management 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 terminal device. They are used to recognize the end device used by the user when visiting our website again or to analyze individual parameters in connection with the use of our website.

A distinction is made between so-called session cookies and so-called persistent cookies. Session cookies are deleted from the user's device after the end of the respective session. Persistent cookies remain on the user's device and serve in particular to recognize the user's device when logging on to the identity Trust Management GmbH website again. Cookies only identify the device, but not the person of the user. Personal data is not stored in connection with the use of cookies.

8. Google Fonts

The websites of identity Trust Management GmbH use Google Web Fonts. These Google Fonts are provided by Google Inc. exclusively locally, i.e. via our servers, and not by Google itself. The use of Google Web Fonts is in the interest of a uniform and appealing presentation of the online offers. In the course of use, user-related data, e.g. IP address, are transmitted to Google. For this purpose, the browser loads the required web font into the browser cache when the website is called up. This is necessary so that the browser can display a visually improved representation of the texts. If the browser does not support this function, a standard font of the computer is used for display.... This represents a legitimate interest within the meaning of Art. 6 para. 1 lit. f DSGVO.

9. Disclosure to Authorities on the Basis of a Legal Basis

identity Trust Management GmbH transmits data about the identity of a data subject within the scope of identification to the legally competent authorities only upon explicit request of an authority entitled to receive information, insofar as this is necessary for the prosecution of criminal offenses or misdemeanors, 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 is 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 authorized body/authority for this purpose 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 duties or if the data controller's interest in being informed prevails.

10. Contact

When contacting identity Trust Management GmbH (e.g. via contact form or e-mail), the user's details will be stored for the purpose of processing the request and in case 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, you are also welcome to contact us at the above addresses.

Responsible for the content is the management

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