PRIVACY POLICY

This Privacy Policy details Identance’s commitment to protecting your personal information through the Identance websites and applications that reference this Privacy Policy. Identance refers to an ecosystem comprising Identance websites (whose domain names include but are not limited to Identance.com), mobile applications, clients, applets and other applications that are developed to offer Identance Services, and includes independently-operated platforms, websites and clients within the ecosystem. Identance is the data controller for personal information collected in connection with provision of Identance services.

By using Identance Services, you are consenting to the collection, storage, processing and transfer of your personal information as described in this Privacy Policy. Please read it carefully before accessing any Identance Services.

Within this Privacy Policy, personal data means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Identance processes personal data in accordance with the provisions of the EU General Data Protection Regulation (GDPR) and other applicable data privacy regulations.

We process your personal data on the basis of our prevailing legitimate interest according to Article 6(1)(f) GDPR to achieve the purposes of giving you services through our website or communicating with you. If not expressly mentioned otherwise, collecting and processing of data is based on Identance’s legitimate interest, considering always that your fundamental rights and freedoms are not overridden by the interests of our communication with you.

In some specific situations (as designated below), we may ask you for your consent to process your personal data. In case you provide your consent, we will be processing your data on the basis of such consent (Article 6(1)(a) GDPR). You may withdraw such consent previously granted at any time. However, withdrawing your consent does not affect the lawfulness of any processing based on your consent before your withdrawal.

If you are engaging with Identance on a contractual basis, Identance processes personal data in accordance with Article 6(1)(b)of GDPR.

When you send personal data of third parties to Identance, you are responsible for ensuring an appropriate legal basis for any such sharing of third parties/data subjects. Identance may ask you to provide evidence that such data is shared on a lawful basis. Identance shall use best efforts to ensure that third parties’ personal data is processed, handled, and collected in the same manner as your own personal data. However, you are solely responsible for obtaining consent from third parties for the use and processing of their personal data.

Additionally, it is your obligation to understand and abide by the applicable local data protection laws.

1. Use of Identance Services and websites

Data shared with Identance by accessing the Identance website is used for the purposes of managing your relationship with Identance as well as better personalization of your experience and interaction with Identance, customizing advertising and offerings.

Identance will store your data as long as needed to provide you with our services and to operate our business. If you ask Identance to delete specific personal information, we will honor this request unless deleting that information prevents us from carrying out necessary business functions, like billing for our services, calculating taxes, or conducting required audits.

#### What Personal Information Identance collects

Depending on your interactions with us, we might collect the following categories of personal information, and for the following reasons:

* We collect Identifiers, like your name and contact information, when you sign up or use our services and to do things like verify your identity, and communicate with you.
* We collect Commercial information when we keep track of the services that you purchase from us and our communications history about those services.
* We collect Financial information, such as your payment information, when you pay for our services.
* We collect Internet and other electronic activity information, such as communications metadata, as you interact with our website or use our services. This metadata may be information about how you interact with our websites and the information on them; what features you use on our service; or it may be your customer usage data as you send communications over the service.
* We collect Geolocation information when you use our services. Depending on the service, this could be location based on your IP address, or, such as if you are using our IoT products and services, based on the cell tower to which a mobile device is connected, or Wi-Fi triangulation.
* We collect Professional or employment information, such as your company or employer or your role at your company.
* If you attend an event or fill out a form or survey with us, we might collect your age, your gender, or other information that counts as characteristics of protected classifications; however, we will only collect those with your knowledge and opt-in consent.
1. Cookies and Web beacons

In order to optimize our services for you, on the basis of your consent, Identance collects your data through the use of cookies. Cookies are small text files that store Internet settings (information on how our website is used) and are stored in your browser or device. Cookies are used in various ways, for example, to analyze your behavior on our website or to customize services based on your preferences.

Identance uses both session and persistent cookies. Session cookies are cookies that disappear from your computer or browser when you turn off your computer. Persistent cookies stay on your computer even after you’ve turned it off.

You can turn off your web browser’s ability to accept cookies. But, if you do that, certain parts of the Identance website or account portal may not work for you.

You can deactivate or limit the use of cookies through cookie banner, as well as delete them easily from your browser settings.

We use web beacons along with cookies to gather data about use of the Identance website and account portal and interaction with emails from Identance. Web beacons are clear electronic images that can recognize certain types of data on your computer, like cookies, when you viewed a particular website tied to the web beacon, and a description of a website tied to the web beacon. For example, we may put web beacons in marketing emails that notify us when you click on a link in the email that directs you to the Identance website or one of its pages. We use web beacons to operate and improve the Identance website and email communications.

When you visit the Identance website, account portal, or use our services, we collect your IP addresses to track and analyze information about the devices that are connecting to our systems and about where those devices are located. For example, we use IP addresses to track which regions visitors to our Identance website or customers logging into our account portal come from and to detect possible fraud.

1. Receiving Identance newsletters

If you provided your email to receive Identance newsletters, Identance might have collected personal data contained within such email addresses. Please note that we regularly send out Identance newsletters to inform users of the new products we are working on. Subscribing to the Identance newsletters is voluntary (based on the consent you have given). Following your subscription, you receive an email through which you can unsubscribe at any time.

Data shared with Identance at newsletter subscription is used to send you Identance newsletter with promotional communications, including emails about the products and services offered by Identance or its partners, and customizing Identance offerings to you. For these purposes, such data may be shared with third-party service providers, as described in Section 11 herein.

1. Contacting Identance

If you are accessing the Identance website and using any of the contact or support forms, the data expressly stated on the form is stored and processed by Identance (including but not limited to name and last name, user name, e-mail address, phone number, city, country of residence, company name, department, job role, city, device, browser, application name, IP address) in order to reply to your request, optimize our services, inform you about Identance products and customize offerings. For these purposes, such data may be shared with third-party service providers, as described in Section 11 herein.

1. Job applications

If you are sending us your CV in an open application or for a particular job opening, the data contained therein shall be processed and stored by Identance. This data is collected on the basis of Identance’s legitimate interest to maintain the candidate database.

Data shared with Identance via emails or any other communication channel will be used to assess your profile for a particular job opening and to potentially contact you. For these purposes, such data may be shared with third-party service providers, as described in Section 11 herein. You can always send a reply stating you want your data and CV to be deleted from Identance’s candidate portfolio.

1. Security measures

Identance implements an information security management system to ensure the confidentiality, availability and integrity of assets from threats and vulnerabilities.

To prevent unauthorized access or disclosure and to maintain data accuracy, as well as to ensure the appropriate use of such data, Identance utilizes all reasonable technical and organizational measures to protect your personal data, including but not limited to minimizing the processing of personal data, pseudonymization, and anonymization of personal data as soon as possible, transparency with regard to the functions and processing of personal data, enabling each individual to have knowledge of the ways and reasons for data processing. All personal data is encrypted while in transit and in storage. Additionally, Identance continuously undertakes and upgrades different measures to ensure the highest standards for data privacy. We design all our processes with special emphasis on protecting personal and confidential data.

Although Identance takes best industry practice in keeping the data safely stored, Identance does not warrant that the undertaken safety, technical and organizational measures will be sufficient to fully protect your personal data against potential unauthorized access and use of your personal data. Moreover, to the maximum extent permitted by applicable law, Identance cannot guarantee the safety of your information when in the possession of other parties. However, if such an attempt is detected, we will notify you as soon as reasonably possible of a potential breach of the security measures either directly to your contact address, if available, or via an alert notification on the Identance website and other appropriate channels.

1. Data sharing

This Privacy Policy does not apply to third parties’ websites and/or services that you may encounter when you use Identance services. We encourage every user to carefully familiarize themselves with privacy policies applicable to any websites and/or services operated by third parties.

Identance may implement additional tools or introduce new third-party providers to enhance your user experience and optimize its services and offerings. Identance will strive to notify of such changes by updating this Privacy Policy in due time. Data collected through the channels described above might be shared with such third parties. You can contact Identance at any time to get additional information about such data sharing.

1. Web analytics tools

Identance uses various technologies and plugins based on its legitimate interests in accordance with Article 6(1) of GDPR to carry out web analysis, improve your website experience, optimize Identance services and products, personalize and enhance its offerings to you. For these purposes, these tools use cookies, track and analyze various data collected. As described in Section 3, you can refuse the use of cookies in your browser settings or through the cookie banner. Please note that in this case, there is a possibility you may not be able to use Identance websites functions to the full extent. This Section also applies to the use of third-party service providers described in Section 11.

1. Plug-ins

### Various links and plug-ins from third parties such as Facebook, Instagram, Youtube, Twitter, LinkedIn, Vimeo, Github are placed on the Identance website. Such services can use their own cookies or tracking pixels to collect information about users who interact with their website via the link or plug-in.

### When you visit Identance websites, your browser automatically connects with the servers of plug-in providers. The content of the plug-in can be directly generated by your browser and integrated into the Identance website. Therefore, plug-in providers are able to track your visit and activities on our website and link them to your profile on the plug-in provider's website. All information about interactions such as comments or your use of the "Like-Button" can be transferred to the plug-in provider and saved by the plug-in provider. If you wish to prevent such transfer and storage of your data, you can log out of your profile at the plug-in provider before using the plug-in.

### Further information about the purpose and scope of data use and data processing by plug-in providers can be found in the plug-in provider's privacy policies: Facebook, Instagram, Youtube/Google, Twitter, LinkedIn, Vimeo, Github.

### Other third-party service providers

Identance does not sell, lease or rent personal data relating to any of its users to third parties. Identance does not sell directly identifiable personal information to third parties. Identance uses selected third-party service providers that may access personal data depending on the service they provide and the purpose of such service. Third parties that have access to personal data are subject to strict Identance data privacy obligations and standards in accordance with the principles set forth in this Privacy Policy. We make sure their handling of any Identance confidential data is based on relevant data processing agreements and policies.

Identance may disclose personal data solely with the following categories of third parties:

|  |  |  |  |
| --- | --- | --- | --- |
| **Provider** | **Service** | **Personal data that may be shared** | **Purpose** |

In order to enhance your user experience and optimize services and offerings, Identance may add additional tools or introduce new third-party providers. Identance will strive to notify of such changes by updating its Privacy Policy in due time. Any data collected through the channels described above might be shared with such third parties. You can contact Identance at any time to get additional information about such data sharing.

In addition, Identance may disclose information to third parties in an aggregate format that does not constitute personal information and does not allow the identification of individual users.

### Affiliated companies

Identance may share information with its affiliates and subsidiaries. Provisions of this Privacy Policy apply to Identance affiliated companies. Depending on which company you contacted and for what reason, such a company shall be considered a data controller in a particular case.

Identance may also share information with its subsequent owner, co-owner, or operator of the services and their advisors in connection with a corporate merger, consolidation, restructuring, or the sale of substantially all of our stock and/or assets, or in connection with bankruptcy proceedings, or other corporate reorganization, in accordance with this Privacy Policy.

### Partners

In order to give you better service and complete support, please note that if you contacted Identance in relation to a production license of Identance product(s), Identance may share your contact details with its partner representing Identance in your respective territory.

### Public authorities

Identance may disclose information to public authorities, such as law enforcement, if legally required to do so, or when necessary to protect Identance rights or the rights of third parties.

## Data transfer

The Internet is a global environment. Using the Internet to collect and process personal data necessarily involves the transmission of data on an international basis. Any such transfer is made in accordance with regulatory requirements that ensure such transfer and/or country maintains the same level of personal data protection. Identance opted for industry-approved providers with the highest privacy and data security standards.

## Your rights related to the collected data

Each individual has a right to know what data Identance holds about any such person. The rights every individual has in relation to personal data shared with Identance are:

* **Right to be informed**;
* **Right to access**: you have the right to obtain confirmation that your data are processed and to obtain a copy of it as well as certain information related to its processing;
* **Right to rectify**: you can request the rectification of your data which are inaccurate, and also add to it. You can also change your personal information in your account at any time
* **Right to delete**: you can, in some cases, have your data deleted;
* **Right to object**: you can object, for reasons relating to your particular situation, to the processing of your data. For instance, you have the right to object to commercial prospection;
* **Right to limit the processing**: in certain circumstances, you have the right to limit the processing of your data;
* **Right to portability**: in some cases, you can ask to receive your data which you have provided to us in a structured, commonly used and machine-readable format, or, when this is possible, that we communicate your data on your behalf directly to another data controller;
* **Right to withdraw your consent**: for processing requiring your consent, you have the right to withdraw your consent at any time. Exercising this right does not affect the lawfulness of the processing based on the consent given before the withdrawal of the latter;
* **Right to define the instructions relating to the use of your personal data post mortem**: you have the right to define instructions relating to the retention, deletion and communication of your Data after your death;
* **Right to lodge complaint to the relevant data protection authority**;
* R**ight not to receive discriminatory treatment by Identance for the exercise of an individual’s rights conferred by the applicable data protection laws**.

## No automated decision making and profiling

Identance does not automatically process, nor use techniques for profiling its users.

## User content

Identance practices a zero-tolerance approach to illegal, prohibited, and unethical activities, as well as upload of related content.

## Children data

Identance does not knowingly collect information from persons who are considered children by their local law. We encourage parents and guardians to take an active role in their children’s online and mobile activities and interests.

Children below the age of 16 may provide their information only if a parent or guardian has given its consent to do so, in accordance with applicable law. If you have reason to believe that a child below the minimum age has provided personal data to Identance through using any of the above-stated services without the necessary consent, please contact us at dpo@identance.com, and we will use commercially reasonable efforts to delete that data.

## Changes to the Privacy Policy

Identance is likely to make changes to the services in the future and as a consequence will need to revise this Policy to reflect those changes. When the Policy is revised, Identance will post the new Policy on the Identance website (identance.com), so you should review the page periodically. We encourage you to review the Privacy Policy whenever you access the services to stay informed about Identance privacy practices. Please do not use Identance services if you do not agree with any of the stipulations contained herein.

## Questions or concerns

Should you have any questions or concerns regarding this Privacy Policy, your privacy as it relates to the use of the services, or the protection of the personal data Identance holds about you, please contact us via e-mail at dpo@identance.com. We seek to promptly resolve any concerns you may have. You can reach our Data Protection Officer at the same address for any questions or concerns relating to your data shared with Identance.