

Privacy Statement

1 Data controller

Nets A/S, Klausdalsbrovej 601, 2750 Ballerup, Denmark, CVR: 30808460 ("Nets"), has developed the Nets ID Verifier app (the "App").

In order for Nets to verify your identity, certain personal data are processed on the natural persons using the App. This notice provides mandatory information on how Nets process your personal data. Please contact Nets (see the contact details below) if you have any questions about data processing carried out by Nets or if you wish to exercise your legal rights.

Nets and the authority/company that you entered into an agreement with are acting as separate data controllers.

Nets is responsible for the processing related to the verification of your identity. This includes processing of the personal data in your ID document that you as a user provide in the App, and the live images of your face uploaded via the App to validate that you are the same person as depicted in the ID document.

Nets is also responsible for the transfer of ID tokens, time stamp and the result of the identity verification to the authority/company that you entered into an agreement with.

Nets is not responsible for any processing activity beyond what is directly related to the verification of your identity and transfer of the token, result of the verification and time stamp for verification. This includes that Nets is not responsible for any data processed about you in connection with the agreement that you have entered into with the authority/company.

2 Description of processing

Nets processes the following personal data on **end-users who are natural persons** and are using the App.

Scanning of ID-document- For the purpose of verifying your identity, we will digitally scan your ID document, e.g. a passport, residence card or driving license.

Categories of personal data – We collect the information present in your ID document. This includes the following information:

- Name, Date of birth, Nationality, Gender, Document number, 2D picture
- National identification number

Source of the personal data- We collect the data from the following source(s):

- Directly from you when you digitally scan your ID documents through the App

Legal basis for the processing- We process your personal data on the following legal bases:

1. Consent, cf. article 6.1.a of the GDPR
2. Consent, cf. the Danish Data Protection Act section 11.2.2.

Recipients - Nets retrieves and validates information about ID documents with its processor, Inverid B.V

Data retention- The photo of your ID document (e.g., passport) will be marked as inactive after each session, and stored in encrypted form in a database, after which they are permanently deleted after a maximum of 90 days.

Facial recognition (liveness data)- For the purpose of verifying that you are the same person as in the picture scanned in the document, we will process facial recognition data (liveness data) based on live images of your face.

Categories of personal data – We collect information from your selfie. This includes the following information:

- Biometric data (facial recognition)
- Liveness data (as a result of face recognition)

Source of the personal data- We collect the data from the following source(s):

Directly from you when you perform a face scan using the App

Legal basis for the processing- We process your personal data on the following legal bases

- Consent in accordance with article 6.1.a of the GDPR
- Consent in accordance with article 9.2.a of the GDPR

Data retention- Facial recognition data and the photo of your ID document (e.g. passport) will be marked as inactive after each session, and stored in encrypted form in a database, after which they are permanently deleted after a maximum of 90 days.

Liveness data as a result of your face scan is only valid for a few minutes and then deleted from the App.

Transfer of verification result- For the purpose of confirming that your identity has been validated, a result of the verification will be generated and transferred to the authority/company who directed you to use the App.

Categories of personal data – We collect the following information from your verification. This includes the following information:

- ID Token
- Result of the verification
- Time stamp of the verification

Source of the personal data- We collect the data from the following source(s):

- The data is generated on the basis of the information in the ID document and facial recognition data that you provide through the App.

Legal basis for the processing- We process your personal data on the following legal bases:

- Consent, cf. article 6.1.a of the GDPR.

Recipients - The personal data may be disclosed to and shared with the following recipients:

- Nets shares the token and the result of the verification of the identity (but not the actual data from the ID document and facial recognition data) with the authority/company who directed you to use the App.

Data retention- The data is stored by Nets for a maximum of 90 days in encrypted form in a database, after which they are permanently deleted.

Mobile device information- For the purpose of gathering use information with the help of a mobile device.

Categories of personal data – We collect runtime/environmental information from your mobile device. This includes the following information:

- MAC
- Phone model
- Network type (cellular/wifi)
- App version
- Rooted or not in addition for Android: - Network address
- Device model with number

Source of the personal data- We collect the data from the following source(s):

- From end-users' mobile devices

Legal basis for the processing- We process your personal data on the following legal bases:

- Consent, cf. article 6.1.a of the GDPR.

Recipients - The personal data may be used by Nets in terms of anonymized statistics on mobile device usage and performance. Note, however, that the App is stateless, meaning no data related to past transactions is stored on server-side.

Data retention- The data is stored by Nets for a maximum of 90 days in encrypted form in a database, after which they are permanently deleted.

3 Transfers to countries outside the EU/EEA

Generally, we do not transfer your personal data to countries outside the EU/EEA.

For the processing of personal data about data subjects using ICAO-compliant ID documents, Nets uses the data processor, Inverid B.V. ("Inverid").

The solution from Inverid is hosted on an Open Telekom Cloud (OTC) platform hosted in Germany.

However, the use of OTC and the related processing activities are subject to supplementary measures, including that

- data is stored at OTC in Germany and thus only within the EU,
- data is stored with OTC for a maximum of 15 minutes - but in practice only for a few seconds - after which they will be permanently deleted,
- data is stored only at OTC in encrypted form, and
- data is encrypted with a key that only Inverid has access to, which is why OTC will not be able to provide access to data in clear text without the customer's involvement.

Further, all transfers of personal data by OTC to a third country are subject to appropriate safeguards as described in GDPR, art. 46.

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4 Your rights

You have the following rights:

- You have the right to request access to, rectification or erasure of your personal data.
- You also have the right to have the processing of your personal data restricted.
- If the processing of your personal information is based on your consent, you have the right to withdraw your consent at any time. Your withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent. You may withdraw your consent by contacting us on support.esecurity@nets.eu.

- You have the right to receive your personal information in a structured, commonly used and machine-readable format (data portability).
- You may always lodge a complaint with a data protection supervisory authority, e.g. The Danish Data Protection Agency.

You can take steps to exercise your rights by submitting your request here: <https://www.nets.eu/gdpr/dsr>.

There may be conditions or limitations on these rights. It is therefore not certain for example you have the right of data portability in the specific case - this depends on the specific circumstances of the processing activity.

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5 Contact

You are welcome to contact us if you have any questions regarding the processing of your personal data or how you can exercise your rights, at this point of contact:

- <https://www.nets.eu/contact-nets/Pages/feedback.aspx>, or
- Our Data Protection Officer (DPO) at dpo@nets.eu.

Nets Denmark A/S

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