



# Privacy Notice

**Effective Date: 1st March 2025**

## Introduction

This Privacy Notice explains what personal information iProov ("we", "our", "us") collects from and about you, and how we may use it, when you participate in one of our product demonstrations.

We also explain your rights in respect of our use of your personal information and how to contact us with issues concerning it.

When we refer to iProov in this Privacy Policy, we mean us and/or the iProov Service, according to the context.

## Our relationship with you

iProov is responsible for adhering to applicable laws that relate to Data Controllers.

## Scope and Purpose of Processing

This Privacy Policy applies to volunteers who have consented to the collection of their facial imagery data for iProov product demonstration purposes.

## Information We May Collect

iProov processes the following categories of personal information:

- Images of your face to produce a photograph and video images of you that are used to create a template that allows for your images to be recognised against a stored or future collected data set associated with a verification process.
- Characteristic data that provides information about liveness and presence.
- Email address and name for consent recording purposes.

## Legal Basis for Processing

We process your personal data:

- **Consent** - Your data will be processed based on your explicit consent provided at the time of your imagery capture. As this data is used to identify you, it is biometric data and in certain countries requires special handling. We obtain your consent to the processing of your facial imagery data for product demonstration purposes.

## Whom will we share your personal information with?

iProov will not share your personal data with any other third parties. Your personal data will be held within the UK and / or European Union.

## Whom will we share your personal information with?

We will keep your personal information for a maximum of twenty-four hours after you have participated in the product demonstration. After this time your data will be deleted and iProov will hold no data that belongs to you.

## How do we keep your personal information secure?

We have put in place appropriate security measures such as pseudonymisation that is intended to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

iProov has implemented relevant security and privacy policies, controls, and measures to adhere to and to meet the requirements of the GDPR / Data Protection Act 2018.

These include regular security tests and independent assessment and certification to certain international information security standards, such as ISO 27001.

## Your legal rights

Under the law, you have specific rights to your data. Some of these rights cannot be exercised or are not relevant to this privacy notice. This is because of the nature of the product demonstration and its short duration or because the legal basis is consent. Other legal bases do not apply and therefore your rights associated with them cannot be exercised.

You have the right to:

- *Request erasure* of your personal information. This enables you to ask us to delete your personal information where there is no good reason for us continuing to process it. Please note that your data is automatically deleted after forty-eight hours.
- *The right to withdraw consent*. If you have provided us with the consent to use your personal data, you have a right to withdraw that consent. You may withdraw your consent by

contacting the product demonstration team or by emailing [compliance@iproov.com](mailto:compliance@iproov.com). Withdrawing a consent will not affect the lawfulness of our use of your personal data that was collected in reliance of your consent before it was withdrawn

Where you make a request, please do so via the product demonstration team or alternatively send an email to [compliance@iproov.com](mailto:compliance@iproov.com). iProov will try to respond to all requests within thirty (30) days. Where it is not possible to do this, we will write to you to inform you that it will take longer to meet your request and will aim to respond within ninety days (90) or alternatively to confirm that we hold no data about you as it has been deleted. Where we cannot respond within this time period, we will notify you of why and of your rights.

## Contacting Us

iProov has a data protection officer who can be contacted at [DPO@iproov.com](mailto:DPO@iproov.com). If you have any questions about this Privacy Notice or about any requests to exercise your legal rights, please send an email to this address.

## Transferring your personal information from the EU to third countries

iProov will not export your personal data to any other third countries. Your personal data will be held and stored within the UK and / or EU.

## Disputes or Filing a Complaint

You have the right to make a complaint at any time to a Data Protection Supervisory Authority if you are unhappy with the way that iProov is processing your data or how it was collected.

In the UK, the Information Commissioner's Office (ICO), ([www.ico.org.uk](http://www.ico.org.uk)) is the Data Protection Supervisory Authority who can deal with your complaint.

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so would request that you contact us in the first instance.

We are registered with the ICO under number ZA441165 as a controller and processor of data.

iProov Limited (we, us or iProov) is a company incorporated in England & Wales under company number 07866563 whose registered office is at 14 Bank Chambers, 25 Jermyn Street, London SW1Y 6HR, England.