

## Privacy Policy

### General Information on Personal Data Protection for the User

<b>Data Controller:</b>	Electronic Identification S.L. as a Qualified Trusted Services Provider ("EID")
<b>Purpose of processing:</b>	(i) to carry out the management, development, fulfillment and control of the contractual relationship in relation to the Video ID service and the issuance of Qualified Electronic Certificates. (ii) to send any type of postal or electronic correspondence related to said relationship; (iii) to include the data in the corporate and departmental contact agendas and those of the employees who require it; (iv) the correct economic, accounting, fiscal and invoicing management derived from the legal relationship maintained; (v) management of the corresponding contractual file for its archiving and maintenance of the contractual file history; (vi) the issuance and management of your electronic certificate of natural person; (vii) electronic identification of users through unassisted video for which, in the event that the user gives express consent, we will use their facial biometric data based on obtaining a sample of key points of biometric data without at any time EID retains all biometric data. This data is pseudonymized using an encryption algorithm, with only the pseudonymized data being used to perform the relevant biometric matching.
<b>Rights:</b>	Access, rectification, deletion, limitation of processing, opposition to processing, portability and objection to being subject to automated individual decision making.

### Advanced information

In compliance with the provisions of current legislation on personal data protection and its implementing regulations, we are pleased to provide you with information regarding the processing of your personal data (hereinafter the "Data").

#### Data Controller

The data you provide us, now or in the future, for the purpose of our relationship, will be processed by eID as the Data Controller, whose registered office is located at Avenida Ciudad de Barcelona 81- A Planta 4ª, 28007, Madrid, with Tax Identification Code B86681533, and registered in the Madrid Company Registry. Registration Data: Volume: 30920, Book: 0, Folio: 146, Section: 8, Sheet: M556508 on April 3, 2013, in its condition of Qualified Trusted Service Provider, in accordance with the provisions of the REGULATION (EU) No 910/2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC ("eIDAS Regulation"), Law 6/2020, of November 11, regulating certain aspects of electronic trust services and Order ETD/465/2021, of May 6, regulating remote video identification procedures for the issuance of qualified electronic certificates.

#### Legal Basis

The legal basis for the processing of the data is the execution of the Contract to which you are a Party. The processing of biometric data, being special categories of personal data ('sensitive data'), is based on the consent of the data subject

## Purpose

As a Qualified Trust Service Provider, your data will be processed by eID in order to issue and manage your qualified electronic certificate of natural person, as well as to allow authentication in certain systems, by means of electronic signature; and to maintain, develop and control our relationship, which includes the attention to your queries or requests for information or documentation.

All data provided by the applicant will be used for the purpose of identity verification and issuance of qualified certificates, as well as for their management throughout their life cycle. By reading the policy and accepting Certification Practices Statement, the applicant consents to the processing of their personal data for the purposes indicated.

In particular, the purposes of the processing are: (i) to carry out the management, development, fulfillment and control of the contractual relationship in relation to the Video ID service and the issuance of Qualified Electronic Certificates. (ii) to send any type of postal or electronic correspondence related to said relationship; (iii) to include the data in the corporate and departmental contact agendas and those of the employees who require it; (iv) the correct economic, accounting, fiscal and invoicing management derived from the legal relationship maintained; (v) management of the corresponding contractual file for its archiving and maintenance of the contractual file history; (vi) the issuance and management of your electronic certificate of natural person; (vii) electronic identification of users through unassisted video for which, in the event that the user gives express consent, we will use their facial biometric data based on obtaining a sample of key points of biometric data without at any time EID retains all biometric data. This data is pseudonymized using an encryption algorithm, with only the pseudonymized data being used to perform the relevant biometric matching. In this sense, information related to your identity, including facial biometric pattern data, will be stored in order to carry out an identification process that will allow eID to access it and verify your identity.

## Type of personal data

The types of personal data processed by EID, including but not limited to, which may be processed by EID for the Provision of e-Trust Services and the Video Identification service include identification data (name, surname and identity data), contact data (postal address, e-mail and telephone), biometric data (extraction of biometric and identification data from the user's identification document, extraction of biometric data from the video and biometric matching between video and image of the user's identification document).

All data provided by the user will be used for the purpose of performing the identity verification service and the Provision of e-Trust Electronic Services, as well as for the management of the certificates issued during their entire life cycle.

## Data retention period

Data will be kept for the term of the contractual relationship, until such time as deletion is requested, and during the period of limitation of any legal action that may be taken, or claims that may be received from official bodies, in relation to this Contract and after its termination. In any case, the maximum period of processing shall be 15 years from the time of issuance of the certificate, unless otherwise provided by law. Once our relationship is terminated, your Data will be duly blocked, in accordance with the provisions set forth in the applicable regulations.

## Recipients

The Data will be communicated to the following recipients: (i) Judges, courts and law enforcement agencies, in compliance with legal requirements, obligations or in the framework of legal proceedings; (ii) banking institutions, for

the management of collections and payments; (iii) tax authorities, for the fulfilment of tax obligations; (iv) financial auditors, for the fulfilment of financial obligations; (v) public authenticating officers in the event of the document being made public; and any other third parties to whom, in accordance with the applicable legislation in force in each case, the transfer is necessary, such as the competent administrative bodies, for reasons of control, registration and inspection.

Users' personal data may be transferred and/or communicated to third parties as a result of consulting the revocation lists or to third parties who require consultation on the status and validity of the certificates.

In addition, the Data may be made available to third parties, both in Spain and in the European Union, for the purposes of the services they provide to our company (such as data hosting or identification support services), under a Processing Manager Contract, which guarantees the appropriate protection measures, in accordance with the provisions of the legislation on the Protection of Personal Data, and with the obligation of return and/or destruction at the end of the service.

## **International Transfers**

There are no international transfers affecting the Data.

## **Rights**

The data subject may exercise his or her rights of access, rectification, erasure, restriction of processing, opposition to processing, portability, and refusal to be the subject of automated individual decision making by sending a request to the following e-mail address: [legal@electronicid.eu](mailto:legal@electronicid.eu), or to the postal address: Avenida Ciudad de Barcelona 81- A Planta 4ª, 28007, Madrid; indicating the right he or she exercises and providing a photocopy on both sides of his or her ID card or legal identity identification document. The interested party is informed of the right to file a complaint in the Spanish Data Protection Agency ([www.aepd.es](http://www.aepd.es)) or the competent EU supervisory authority and to request information and protection from that body regarding the exercise of their rights.

You may revoke, by the means indicated above, and at any time, the particular consents we request from you in this clause, without retroactive effect and in the terms provided by law.

All the data that we request from you is obligatory, so any failure to comply with some of them may make it impossible for us to provide the services we offer. The electronic signature services offered by eID can only be performed if the requester provides all of the data requested truthfully and without including any false information.

The Data you provide us with must be correct and up to date at the time you provide us with the information, and you therefore guarantee its authenticity and truthfulness. In addition, we ask you to inform us of any changes to your Data, quickly and diligently, with the sole purpose of keeping our file permanently updated and without any type of error in relation to your Data.

## **Legal Age**

Our services, as well as the goods that we provide in relation to qualified e-trust through our platform can only be used by people of legal age. You hereby ensure that the information that you include regarding your date of birth is correct. The user will be sued for any liability that may be derived for eID caused by falsely indicating your age.

## **Confidentiality and security measures**

We would like to inform you that eID will handle your data with the utmost confidentiality and as established in the uses and purposes expressly described above. We would also like to inform you that eID has implemented the technical and organizational measures necessary to guarantee the security of your data and prevent its unauthorized alteration, loss, processing, or access, taking into account the status of the technology, the kind of data being stored, and the risks it is exposed to, in accordance with the provisions in the applicable law on data protection