

Privacy Policy for Biometric ID Verification

Please read the following carefully to understand our approach and practices regarding Your Information and how we treat it. Please do not use the ID-Pal App if you do not agree with the ways in which we will process Your Information.

Elavon Financial Services DAC (“**Elavon**”) has established this Privacy Policy for Biometric ID Verification to let you know about the processing of Your Information for the purposes of verifying your identity, obtaining identification documents, and otherwise meeting regulatory requirements. Elavon is the Data Controller of your information.

The processing of Your Information governed by this Privacy Policy for Biometric ID Verification includes processing by use of the ID-Pal app (the “**ID-Pal App**”) supplied by ID-Pal Limited, a company incorporated under the laws of Ireland with company registration number 578727, whose registered office is at 21 Lad Lane, Dublin 2, D02 A388, Ireland (“**ID Pal**”). Processing of Your Information by ID-Pal is carried out as processor on behalf of Elavon. References to “**we**”, “**us**”, or “**our**” are to Elavon and/or ID-Pal as the context requires.

By “Your Information” we mean the personal and financial information We obtain from You or from third parties (such as credit reference and fraud prevention agencies, joint account holders, Your employees or officers of Your business, other organisations who introduced Us, or act on your or Our behalf) which, where You are a sole trader or partnership, may relate to You and/or Your business partners and guarantors and where You are a company or limited liability partnership, may relate to Your officers, shareholders, partners, owners and guarantors.

Your explicit consent to processing of “special category” biometric data

In order to carry out ID verification with the ID-Pal App, we need your explicit consent to process your biometric data in the ID-Pal App. The ID-Pal App is offered for your convenience as a quick and efficient way to verify your identity. You are under no obligation to use the ID-Pal App and have your biometric processed. You may withdraw your consent at any time - if you wish to withdraw your consent, please cease using the ID-Pal App and delete it. This will not affect the lawfulness of any processing carried out before you withdraw your consent.

What information do we collect about you?

- photographic and video images of you, when you provide us with a “selfie” photo, video-clip;
- pictures of your passport and national identification card or driving licence;
- biometric data, when we compare your “selfie” photo against your photographic ID;
- details from your passport, such as your name, gender, date of birth, nationality, passport number and MRZ code;
- details from your national identification card or driving licence, such as your name, address, date of birth and driving licence number;
- details from your proof of address documentation, such as your name, address and account number;
- additional information that you provide to us as confirmation of your name, gender, address, date of birth, email address and mobile telephone number;
- all information collected using cookies or similar technologies; and
- the IP address of your device.

How do we collect your information?

- directly from you; when you submit your information through the ID-Pal app, or if you contact us directly for any reason, for example calling us or emailing us; and
- from third party service providers or public sources, to conduct verification checks on the information you have provided to us.

How do we use Your Information?

We use Your Information for the following purposes:

Purpose:	Legal basis of processing:
To conduct biometric identification and verification checks.	Explicit consent
To conduct anti-money laundering checks and fulfil our regulatory obligations in connection with the services.	Legal obligation

How do we share Your Information?

We may at any time give Your Information to:

- Service providers (including ID-Pal), advisors and agents providing services to Us (including our group companies and Affiliates);
- Regulatory bodies where required for regulatory purposes;
- Our professional advisors in order to obtain advice in relation to our relationship with you;

In addition, We may at any time give Your Information to any organisation that requires disclosure of Your Information for regulatory purposes or as a matter of law whether or not their power is derived from an Act/Acts of Government. You further acknowledge and agree that Your Information, may be supplied by Us to our Affiliates for all of the purposes listed above.

Overseas transfers of Your Information

We may transfer Your Information to countries outside the European Economic Area (EEA) where data protection laws may not be as strict as they are in the EEA. If we do so we will put in place appropriate controls to ensure that Your Information is protected adequately, in particular through standard data protection model clauses adopted by the European Commission. For more information about these controls please contact us at EUDataProtectionOffice@elavon.com.

For how long do we keep Your Information?

Where necessary, we will keep Your Information for as long as we have a contract with you and for as long as we need Your Information for regulatory or evidential purposes after expiry of termination of your contract.

Am I subject to a decision based solely on automated processing?

The ID-Pal App conducts identification and verification checks by automated means. The results of the automated checks will verify your identity and in turn this may contribute to an overall decision made by Elavon.

Your rights

Individuals have the following rights under data protection legislation:

- a right to ask for a copy of their personal data
- a right to ask Us to delete or correct any information We hold about them that is inaccurate;
- a right to request erasure of information in certain circumstances;
- a right to data portability (this is a right to ask for Your Information in a commonly used electronic format where information has been provided by the individual and the legal basis for processing that information is consent or contractual necessity);
- a right to restrict processing and a right to object to processing activities in certain circumstances;
- a right to stop Your Information from being used for direct marketing purposes; and
- a right to lodge a complaint with the Data Protection Commissioner (or other supervisory authority in the European Union) if You believe that Your Information has not been processed in accordance with the requirements of the data protection legislation.

Contact Us

If you have any questions, concerns or complaints regarding our compliance with this Privacy Policy for Biometric ID Verification and data protection laws, or if you wish to exercise your rights, we encourage you to first contact us using the contact details below. We will investigate and attempt to resolve complaints and disputes and will make every reasonable effort to honour your wish to exercise your rights as quickly as possible and in any event, within the timescales provided by data protection laws.

Address: Data Protection Officer, Elavon Financial Services DAC, Cherrywood Business Park, Loughlinstown, Dublin 18, D18 W319.

Email: EUDataProtectionOffice@elavon.com or queries@elavon.com

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