

Privacy Policy Digidentity Identity Service

Version 3.0

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Introduction

At Digidentity Identity Service, our mission is to respect your privacy and protect your personal data.

In this privacy policy, we will inform you about the way we look after your personal data whenever you visit our website or interact with us in any other manner. Also, we will tell you about your privacy rights and explain how you may exercise them.

This document contains:

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1. INFORMATION ABOUT US AND THIS POLICY

WHO ARE WE?

This Privacy Policy ("**Policy**") describes Digidentity B.V.'s use of your personal data. References in this Policy to "**Digidentity**", "**we**" or "**us**" shall mean Digidentity B.V.

(registered in the Netherlands under company number 27322631), being the data controller for the data processing.

PURPOSE OF THIS POLICY

With every service we provide we take the protection of your privacy and personal data very seriously. We ensure that we collect and process personal data in compliance with applicable privacy and data protection law. We do not allow anyone to use or access your personal data for any other purposes than those set out in this Policy.

In this Policy, we give you information about how Digidentity collects and processes your personal data when you visit our website or otherwise interact with us. This includes any personal data that you provide when you purchase our products or services. The Policy also informs you how you can exercise your rights.

It is important that you read both this privacy policy and our [Terms and Conditions](#). This policy does not override earlier policies, but rather supplements them.

We protect and handle any personal data about you in accordance with relevant and applicable data protection and privacy legislation (including but not limited to the EU General Data Protection Regulation ("**GDPR**")).

CONTACT DETAILS

If you have any questions, comments or requests concerning this Policy, please contact our data privacy officer (by e-mail, postal service or phone) using the details set out below.

Email address: privacy@digidentity.eu

Postal address: PO Box 19148, 2500 CC The Hague, the Netherlands

Telephone number: +3188 7 78 78 78

If you have any concerns about the way we handle your personal data you have the right to make a complaint at any time to the local data protection authorities. In the United Kingdom, this is the Information [Commissioner's Office or "ICO"](#). In the Netherlands, this is the [Autoriteit Persoonsgegevens or "AP"](#). However, we would appreciate the chance to respond to your concerns before you approach either the ICO or the AP, so please [contact us](#) in the first instance.

2. WHAT PERSONAL DATA WE COLLECT ABOUT YOU?

We collect and process personal data about you when you interact with us and our products and services, or when you use or purchase our products or services. Personal data includes any information from which you can be identified (directly or indirectly).

We have grouped different categories of personal data we may process:

- **"Identity Data"** which includes, if relevant: name, or similar identifier, date of birth, gender, BSN or equivalent identifiers and other similar data;
- **"Contact Data"** which includes, if relevant: billing address, home address, email address and telephone number(s);
- **"Financial Data"** which includes, if relevant: bank account number and/or other payment card details;
- **"Transaction Data"** which includes, if relevant: details about payments and delivery to and from you and other details of products and services you have purchased from us;
- **"Technical Data"** which includes, if relevant: internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to use our products and services;
- **"User Profile Data"** which includes, if relevant: your username and password, your purchases or orders, your preferences, feedback and survey responses;
- **"Usage Data"** which includes, if relevant: information about how you use our website, products and services;
- **"Aggregate Data"** which include, if relevant: statistical and/or demographic data, which we have derived from your personal data and which we may for example use to calculate the percentage of users that access a specific website feature. We ensure the key to link the aggregate data back to your personal data can only be accessed by those persons who need to access it for specific and legitimate purposes.

We do not collect any **sensitive or special categories of personal data**. Such data may include details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. Nor do we collect information about any criminal convictions or offences.

WHAT HAPPENS IF YOU DO NOT PROVIDE PERSONAL DATA?

You do not have to supply us directly with any personal data when you use our website. However, some communications, services and facilities can only be provided if we receive relevant details from you, or they may not function properly if you do not provide certain data. If and when you wish to communicate with us or make use of any of our services and/or facilities, we will inform you at that time about which personal data we need (and which we may not need) in order to respond to your request. Also, we will inform you of the (possible) consequences if you do not provide us with the personal data we require you to give.

Also, it is important that the personal data we hold about you is accurate and current. Please, inform us through your online account, or via the contact details as set out above if

your personal data changes during your relationship with us.

3. HOW DO WE USE YOUR PERSONAL DATA?

We will only use your personal data in accordance and compliance with applicable data protection and privacy laws. We use your personal data we collect through our website on the following grounds:

- As required to perform a contract with you.
- As required by us to enable our business and pursue our legitimate interests. We will only use your personal data if using them does not conflict with your interests and fundamental rights.
- Where we need to comply with applicable legal or regulatory obligation and for the protection of our legitimate business interests and legal rights, such as for security, (credit) fraud prevention purposes and for use in connection with legal claims, compliance, regulatory and investigative purposes.
- In accordance with your preferences and your consent.

FOR WHICH PURPOSES DO WE USE YOUR PERSONAL DATA?

In the table below, we have described all the ways we collect and process your personal data. We have also indicated which of the legal grounds (as explained above) we rely on to do so. Moreover, we have identified what our legitimate interests are where appropriate.

Please note that we may process your personal data for more than one legal ground. This depends on the specific purpose for which we are processing. If more than one legal ground has been set out in the table below, feel free to [contact us](#) for details about the specific legal ground we are relying on to process your personal data.

Purpose/Activity	Type of personal data	Lawful basis for processing including basis of legitimate interest
Automated technologies and interactions (including, but not limited to log information, data analytics and cookies).	(a) Technical (b) Usage	(a) Necessary for our legitimate interests (in maintaining and managing our website and ensuring its security). (b) With your consent Please find more information in Chapter 4 on "cookies".
Responding to your inquiry when you seek interaction with us (including, but not limited to	(a) Identity Data (b) Contact Data	Necessary for our legitimate interest (i.e. legitimate business in communicating with you and/or your

inquiries, creating an account, subscriptions, feedback and reviews)		wishes and expectations, accessing appropriate professional advice, ensuring we comply we with obligations to which our business is subject).
To register you as a (new) customer	(a) Identity Data (b) Contact Data (c) Profile Data (d) Technical Data (e) Financial Data (f) Transaction Data (g) Usage Data	(a) Performance of a contract with you. (b) With your consent.
To process and deliver your purchase orders (including, but not limited to managing payments, fees and charges, collecting and recovering money owed to us)	(a) Identity Data (b) Contact Data (c) Financial Data (d) Transaction Data	(a) Performance of a contract with you. (b) Necessary for our legitimate interests (to recover debts due to us).
To manage our customer relationship with you which will include: (a) Notifying you about changes (b) Asking you to leave a review or take a survey	(a) Identity Data (b) Contact Data (c) Profile Data	(a) Performance of a contract with you. (b) Necessary to comply with a legal obligation. (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services).
To administer and protect our business and the website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity Data (b) Contact Data (c) Technical Data	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise). (b) Necessary to comply with a legal obligation.
To make suggestions and recommendations to you about products or services that may be of interest to you (Promotional offers)	(a) Identity Data (b) Contact Data (c) Technical Data (d) Usage Data (e) Profile Data	Necessary for our legitimate interests (to develop our products/services and grow our business).

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it. The exemption may be that we may need to use your personal data for a reason that is related to or compatible with the original purpose. If you wish to get more information as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we want to process your personal data for an unrelated purpose, we will notify you prior to commencing such processing and we will inform you of the lawful basis on which such processing is based, or otherwise only do so with your consent.

4. WHAT ARE COOKIES AND HOW DO WE USE THEM?

Cookies are files that store information on your hard drive or your browser. Thanks to cookies, companies can see whether you have visited their website before. This allows you to maintain your preferences on those websites.

If you wish, you can delete all the cookies currently stored on your computer. You can find out how to delete cookies for your browser by clicking 'help' on your browser's menu. You can also find out how to do this, and find further information on cookies at www.allaboutcookies.org. If you delete your cookies, however, you may find that you can no longer take full advantage of the websites you visit.

Category 1: Strictly Necessary Cookies

These cookies are essential in order to enable you to move around the website and use its features. Without these cookies, we cannot provide services you have asked for such as remembering your login details or data provided for a purchase. Cookies that are timed (i.e. session cookies) will expire after the set time interval, unless replaced by another cookie with a new timer. Cookies that expire on session end will be erased when the user closes (all) the browser instances. The session cookie is stored in temporary memory and is not retained after the browser is closed. Session cookies do not collect information from the user's computer. They typically will store information in the form of a session identification that does not personally identify the user.

Category 2: Performance Cookies

These cookies collect information on how people use our website. For example, we use Google Analytics cookies to help us understand how users arrive at our site, browse or use our site and highlight areas we can improve such as navigation, website experience and marketing campaigns. The data stored by these cookies never shows personal details from which your individual identity can be established.

Category 3: Functionality Cookies

These cookies remember choices you make, such as the country you visit our website from, language and search parameters such as number of visitors and time of stay. These can then be used to provide you with an experience that is more appropriate to your selections and to make the visits more tailored and pleasant.

GOOGLE ANALYTICS

Our website uses Google Analytics, which is a web analytics service provided by a third-party provider (Google Inc.) Google Analytics is used for the purpose of evaluating your use of our website, compiling reports on website activity and other services relating to website activity and internet usage. The information generated by the cookie about your use of the website is usually transmitted to and stored by Google on servers in the United States. This transfer is covered by Google Inc.'s Privacy Shield certification and a separate data processing agreement that we have concluded with Google. On this website, we have also activated the IP anonymization tool "gat._anonymizeIp();" provided by Google Inc. to help protect your privacy.

This means that your IP address will automatically be shortened after it is collected so it can no longer be connected to you (see <https://support.google.com/analytics/answer/2763052>).

For further information see

https://support.google.com/analytics/answer/6004245?hl=de&ref_topic=2919631
(information on Google Analytics and data privacy).

We don't use third-party cookies for any commercial purposes.

Where we use third parties to deliver a service on our behalf, please visit their website to obtain further information regarding their use of cookies.

5. SHARING YOUR PERSONAL DATA

Where necessary, your personal data may be shared with our suppliers, third party service providers and professional advisors who will process it on behalf of Digidentity in order to help us fulfil our purposes for processing data as described in the table above, i.e. to help us administer and manage our website, in order to resolve a query or complaint, in order to manage online payments or fulfil and deliver orders. Please find a list of third parties we may share your personal data with below.

In any other case, we will not share your information with any third party unless:

- we have your permission;
- we are required to do so by law;
- this is necessary in order for us to enforce our terms of use, rights or property or the rights or property of any third party; or
- this is necessary in the connection with the sale, transfer or merger of (parts of) our

business or its assets (in which case your details will be disclosed to our advisers and any prospective purchaser's advisers and will be passed to the new owners.)

THIRD PARTIES

Internal Third Parties

Other companies in Digidentity's parent company Solera/Audatex Group, acting either as joint controllers or processors. They are based in the European Economic Area (EEA), provide IT and system administration services and undertake information reporting.

External Third Parties

- Service providers
All our service providers are based in the EEA.
- Professional advisers, including lawyers, bankers, auditors and insurers. They, too, are based in the EEA and they provide consultancy, banking, legal, insurance and accounting services.
- Various government authorities and/or law enforcement officials.

We require all third parties with whom we may share your personal data to respect the security of your personal data and to treat it in accordance with the law. We do not allow third parties to use your personal data for their own purposes and only permit them to process your personal data for specified purposes as per our instructions. All these conditions are laid down in data processor (or other) agreements which we have concluded with them prior to sharing your personal data and in accordance with applicable data protection and privacy legislation.

6. INTERNATIONAL TRANSFERS

Unless expressly stated otherwise in this Policy, we do not transfer your personal data outside the European Economic Area (**EEA**).

7. DATA SECURITY

We have taken the necessary security measures to prevent that your personal data is accidentally lost, used or accessed in any unauthorised way, altered or disclosed. Also, we limit access to your personal data to those employees who have a business need to know. They will only process your personal data as per our instructions, and they are legally bound to keep your personal data confidential.

We have set up procedures to deal with any suspected personal data breaches, and we will notify you and any relevant data protection authority of a breach where we are legally required to do so.

8. DATA RETENTION

HOW LONG WE STORE YOUR PERSONAL DATA?

We will only store and process your personal data for as long as we need to in order to fulfil the purposes we collected it for, including compliance with any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider:

- the amount, nature, and sensitivity of the personal data,
- the potential risk of harm from unauthorised use or disclosure of your personal data,
- the purposes for which we process your personal data,
- whether we can achieve those purposes through other means, and
- the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our [retention policy](#).

In some circumstances, we may anonymise personal data (so that it can no longer, in any manner possible, be associated with or be re-identified with you).

9. YOUR RIGHTS

You have the right to:

Request access to the personal data (commonly known as a “data subject access request”) we hold about you. This means that you receive a copy of the personal data we hold about you, so that you can check that we are lawfully processing it.

Request correction (i.e. rectification) of the personal data that we hold about you. This means you can have any incomplete or inaccurate personal data we hold about you corrected. However, we may need to verify the accuracy of the new personal data you provide to us.

Request erasure of your personal data. This means that, you can ask us to delete personal data we hold about you. Please note however that the right to erasure is not absolute, and we may not be able to fulfil (a part of) your request if we are required to keep (certain) personal data by law or in connection to a contract with you. We will in our response to your request explain this to you in more detail where applicable.

Object to processing of the personal data we hold about you in cases where we rely on a legitimate interest (or those of a third party) and as you feel it impacts on your fundamental rights and freedoms.

If we have responded to your request for objection, you also have the right to ask us to

delete your personal data.

Request restriction of processing of the personal data we hold about you. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- (a) if you want us to establish the personal data's accuracy;
- (b) if our use of the personal data is unlawful but you do not want us to erase it;
- (c) if you need us to hold the personal data even though we no longer require it, as you need it to establish, exercise or defend legal claims; or
- (d) if you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer (i.e. data portability) of the personal data we hold about you to yourself or a third party of your choice. We will provide to you, or that third party, your personal data in a structured, commonly used, machine-readable format. Please note that this right only applies to digital information that you have provided us with, either on the basis of your consent, or where we needed to process the information in the performance of a contract we have with you.

WITHDRAWAL OF YOUR CONSENT

In those cases where we rely on your consent for the lawful processing of your data, you have the right to withdraw consent at any time. If we have no other legal ground on the basis of which we may process this data, we will discontinue processing it once you have withdrawn your consent.

Please note that any processing we carried out before the withdrawal of your consent remains lawful. Also, if you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case when you withdraw your consent.

If you wish to exercise any of these legal rights, please contact us via the contact information in Paragraph 1.

NO FEE IS USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other legal rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

If and when you make a request with respect to any of your rights as described above (i.e. access, correction, erasure, objection, restriction or transfer) we may need to request specific information from you to help us confirm your identity and to ensure your right to access your personal data (or to exercise any of your other legal rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We aim to respond to all legitimate requests within one month. Occasionally, it may take us longer than a month if your request is particularly complex or if you have made a number of requests. In this case, we will notify you of such a delay within one month and keep you updated.

10. GLOSSARY

LEGAL GROUNDS

Legitimate Interest means the interest of our business in conducting and managing our business, so that we can give you and others the best service/product and the best and most secure experience. We consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where the impact on you overrides our interests (unless we have your consent or are otherwise required or permitted to by law).

If you would like further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities, please [contact us](#).

Performance of Contract means that we process your personal data where it is necessary for the performance of a contract to which you are a party, or to take steps at your request before entering into a contract.

Comply with a legal or regulatory obligation means that we process your personal data because we need to fulfil a legal or regulatory obligation

Consent means that we process your personal data because you have given us (demonstrable) permission to do so.

CHANGES TO THE POLICY

Our Policy may require updates from time to time. We shall publish any changes we may make to our Policy in the future on our website www.digidentity.eu/en