

JanusID Privacy Statement

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About us

JanusID B.V. ('JanusID', 'we', 'us' or 'our') is a Dutch company with offices at Benoordenhoutseweg 21-23, 2596 BA The Hague (NL) and registered under number 65206231 with the Dutch Chamber of Commerce. JanusID operates several websites including www.janusid.net and www.checkedid.net ('Websites') and provides services associated with a JanusID account and mobile identity application ('Services').

This privacy statement governs the processing of personal data on our Websites, your JanusID Account and Services. JanusID has notified this registration to the Dutch Data Protection Authority, 'Autoriteit Persoonsgegevens'.

Thank you for taking the time to read our privacy statement. Your privacy is important to us. Therefore, we aim to deliver our services in accordance to the European Union's General Data Protection Regulation ('GDPR'). We adopt Data Protection by Default and by Design as guiding principles. These principles mean that, for instance:

- You control the contents, access and use of your personal data.
- We only use your personal data when this is essential to deliver our services.
- Your personal data may only be shared with anyone after your explicit consent or under a legal obligation.

1. Website Visitors

- a. We aim not to process personal data from visitors to our Websites other than what our visitors explicitly and voluntarily shared with us.
- b. We do process non-personally identifiable data of the sort that web browsers and servers typically make available, such as the browser type, language preference, referring site, and the date and time of each visitor request. Our purpose for processing non-personally identifiable data is to better understand how visitors and customers use our products.
- c. We may process non-personally identifiable data, for instance by creating a report for internal purposes on trends in the usage of our services.

2. Processing personal data

- a. Certain users or visitors of our Websites and users of our Services choose to interact with us in ways that require us to process their personal data. The amount and type we process depends on the nature of the interaction.
- b. In each case, we process such data only insofar as is necessary and appropriate to fulfil the purpose of the user's interaction with us.
- c. Visitors and users can always refuse to share personal data, with the caveat that it may prevent them from using or receiving certain features for which we consider these data essential.
- d. For any personal data you may share with us, we explicitly state the grounds, the purpose and the types of processing that apply to processing these data.

3. What data do we process?

- a. Depending on your use of the Websites or Services, we process some or all of the personal data you shared with us. This may include:
 - i. Your chosen name (e.g. nickname)

- ii. Your formal name, first and middle name(s)
 - iii. Gender
 - iv. Date of birth
 - v. Address
 - vi. Telephone number(s)
 - vii. E-mail addresses
 - viii. Passport number
 - ix. Drivers Licence number
 - x. Identity card number
 - xi. Place of birth
 - xii. Nationality
 - xiii. Photos of you that you provide through our app (e.g. selfies or ID pictures)
- b. Whenever possible we aim to minimize the collection of personal data. With regards to your use of JanusID accounts this may be accomplished by connecting your account to other, primary sources of your personal data (i.e. data federation).
4. How do we process your data?
- a. When using the JanusID account or our Services, we may process your data to verify your identity at Mitek Systems B.V. and InnoValor Software B.V., each providing industry leading services for mobile image capturing, identity document verification and biometric facial recognition. For this they will:
 - extract the contents and check the validity of your chosen ID-document, and
 - match your live photos and/or video with the ID-document to ensure it's really yours.
 - b. We may process your data to contact you by email and/or phone. We will not contact you for unsolicited marketing purposes, and only if there is a specific need (e.g. to inform you about our terms of service, to respond to your technical or service queries, etc.).
5. When do we disclose your data?
- a. The data you provide to us will not be disclosed to parties other than those we work with to deliver the JanusID Account and Services. These parties will be made known to you upfront. See also article 7.c.
 - b. We may disclose your personal data where we have your permission or where we have a duty to share it to comply with any legal obligations.
6. Your rights to control your personal data in your JanusID Account
- a. You can access and update your data any time by logging in to your JanusID Account at www.janusid.net. This fulfils the requirements as set out in EU's GDPR (art. 15 'Right of Access').
 - b. If you terminate your account, there will be a 30 day deactivation period. Your existing consents to share data with websites will be revoked immediately at the time of your termination request. During this period, you cannot access your account. After the deactivation period your account will be deleted. Note that certain data relating to your former JanusID Account will be kept in our records to comply with applicable laws and regulations.
7. Data security
- a. We operate a security policy that dictates that appropriate measures are implemented to ensure that your personal data is protected from accidental or unlawful disclosure, loss or modification.
 - b. We host our services and process your data in the European Union.

- c. Each third party that we choose to engage with to deliver the JanusID Account and our Services will be assessed on their data protection and security practice. Each will have an agreement with JanusID stating the terms that apply to make use of our services. However, we do not actively monitor third parties handling of your personal data. If you suspect inappropriate handling of your data by a third party, you can inform us as indicated in article 10.

8. Cookies

In case we use cookies, these will only serve to support us in optimally delivering our Websites. These cookies will not allow you to be tracked, profiled or targeted by third parties.

9. Changes to this statement

We may update this Privacy Statement from time to time. Any revised statement will be published on our websites www.janusid.net and www.checkedid.net. Active JanusID Account users will receive an email notification of such change.

10. Contact us

If you have any questions or concerns about this Privacy Statement, the practices of the Websites or Services, or your dealings with the Websites or Services, please contact us by emailing legal@janusid.nl.

