

KY ORCHESTRA

PRIVACY POLICY

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1. Introduction

The iCOVER Group (“**iCOVER**” or “**We**”) is a French headquartered group specialised in international verification services, backed by a network of offices worldwide, for the global market.

Through the KY Orchestra platform (“**KYO Platform**”) we provide identity verification service (“**IVS**”) to assist our clients to conduct various digital “Disclosure and Barring Service”, “Right to Work” and “Right to Rent” checks on individuals (“**You**”). IVS is built as per the rules set out in the UK Digital Identity and Attributes Trust Framework (“**UKDIATF**”) of the UK Department for Culture, Media and Sport, and allow one time verification of an individual’s identity.

This privacy policy (the “**Policy**”) is provided in compliance with the UK General Data Protection Regulation (“**UK GDPR**”), the General Data Protection Regulation (“**GDPR**”) and any data protection law applicable in your jurisdiction (the “**Data Privacy Laws**”). We are firmly committed to respect your right to privacy and take seriously our responsibilities concerning the processing of your personal data. This Policy provides you with information regarding the processing of your personal data when you are invited on the KY Orchestra Interface (“**KYO Interface**”) to perform IVS and sets out important information about your rights.

This Policy applies to all personal data we process in the course of providing our IVS worldwide, regardless of where you are located. If you reside outside the UK or EU, you may have different privacy rights and protections under the laws of your country.

If you have any questions about this Policy or want to exercise your rights set out in this Policy, please contact us by sending an email to privacy@icover-services.com.

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2. Processing and deletion of personal data

While providing IVS, our client engages us to help them verify the identity of a living person's identity (you) during a one-time transaction to confirm you are a real person and not someone trying to impersonate you.

Our client defines who will undergo IVS; for what purpose; the legal basis for processing your personal data as well as information pertaining to how your information is collected, used, shared and retained by them. Our client will have communicated this information with you.

2.1. Personal data we collect

Personal data collected for the purpose of the IVS include:

2.1.1. Identification document data

What? Full name, date of birth, address, document type and number, document issuing and expiry date, photo, MRZ code.

How? Your identity document is scanned, and the data is extracted from it so that your identity could be verified.

Why? This is the base against which we will conduct the liveness face match check, by comparing the document portrait and the video selfie.

2.1.2. Biometric data

What? Biometric data (ie. biological or behavioral characteristics).

How? A short video is made so that a liveness verification is performed.

Why? An image of your face ("face template") is extracted from the video and compared with the photo extracted from your identity document.

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2.1.3. Address data

What? Current address.

How? We collect your current address from information that you have provided to us such as a proof of identity documents, including all category of documents necessary to facilitate the check (utility bill, bank statement, credit card statement, birth certificate, citizenship certificate, marriage certificate, mortgage statement, etc.) and compare it to the address held by a trusted data provider.

Why? To confirm your current address

2.1.4 Telecommunication

What? Mobile number verification

How? Confirmation with Mobile Network Operator to confirm SIM ownership and active status. Personal data involved: MSISDN (phone number) and verification result.

Why? To confirm your mobile number.

Upon completion of the identity verification service, a report is provided to our clients to assist them to conduct digital identity verification checks for different purposes, these could include but are not limited to “Disclosure and Barring Service”, “Right to Work” and “Right to Rent” checks.

2.2. Personal data we report to our clients

Personal data included in the report:

- General information: first name, middle name, last name, current address, date and place of birth;

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- Identity document information: type, issuing country, data of issuance and expiry date;
- Verification information: verdict and reason for failure (if any).

2.3. Deletion of personal data

Once the check is completed and the report is issued, we delete your personal data in accordance with the data retention period defined by our client; and in any event, we do not retain your data for more than the indicated retention period below:

	Verification successful	Verification not successful	Verification not successful and including a fraud suspicion
Identification	3 days from the closing of IVS	30 days from the closing of IVS	As long as necessary
Document data	3 days from the closing of IVS	30 days from the closing of IVS	As long as necessary
Biometric data	3 days from the closing of IVS	30 days from the closing of IVS	As long as necessary
Address data	3 days from the closing of IVS	30 days from the closing of IVS	As long as necessary
Document data	3 days from the closing of an Identity Verification Service	30 days from the closing of an Identity Verification Service	Retained only for the time strictly necessary to investigate the suspicion and fulfill legal or regulatory obligation

In any event, we delete your personal data after thirty (30) days, which is the maximum amount of time that we can have access to your personal data unless there is a regulatory reason that prevents us from deleting your personal data, for instance, if we suspect a fraudulent document

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that we may share with fraud prevention agencies or upon request to law enforcement authorities.

2.4. Legal basis for the processing

We process your personal data for the provision of IVS as a data processor for the benefit of our clients with whom we have a service agreement. iCOVER has a legitimate interest to process your personal data for commercial interests as the processing is necessary for the performance of the service agreement with our clients. Our clients have their own legal basis for the processing of your personal data that is defined by the client and on a client-by-client basis in the privacy policy that they have communicated to you.

Where necessary, iCOVER may collect your consent on behalf of our client, particularly the explicit consent for the processing of Biometric Data. You may decide not to give your consent, in this case, we will not be able to perform IVS.

3. Fraud prevention agencies

The personal information we have collected from you will be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance, or employment.

For UK: further details of how your information will be used by us and these fraud prevention agencies, together with your data protection rights, see the [Fair Processing Notices for Cifas](https://www.cifas.org.uk/fpn) (<https://www.cifas.org.uk/fpn>)

Elsewhere: If you are located outside the UK, and if required by law, we may share your information with local equivalents of fraud prevention agencies, credit bureaus, or other

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governmental authorities only if required by law. We will only do so in compliance with applicable data protection regulations. For more information specific to your jurisdiction, please contact us.

4. Transfer of personal data

We guarantee an adequate level of data protection for all cross-border transfers by implementing internationally recognised safeguards. These include the European Commission Standard Contractual Clauses (SCCs) as well as any other data transfer agreements that have been formally authorised by the relevant supervisory authorities, ensuring compliance with applicable data protection laws.

We transfer or may transfer your personal to:

- **Our client.** We perform IVS on their behalf and provides them with a report ;
- **Law enforcement authorities.** upon a law enforcement or regulator's request, we may be obliged to disclose personal data. We carefully validate these requests, including reviewing the legality of any order and challenging the order if there are grounds under the law to do so, before any personal data is disclosed ;
- **Fraud prevention agencies.** For UK, in case we have a fraud suspicion, we will investigate and if the investigation meets the criteria for reporting to CIFAS. For more information about CIFAS, you can click [HERE](https://www.cifas.org.uk/contact-us) (<https://www.cifas.org.uk/contact-us>) or refer to the "Fraud Prevention Agencies" section;
- **Third-party service providers** that are involved in IVS Unissey for Biometric Verification, fraud prevention and document verification services including Experian CrossCore for Address History verification. For Experian CrossCore, a record of the search will be kept on the individual's credit report.

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In addition, we may transfer your personal to our affiliate entities: (BULGARIA) ICOVER SERVICES EOOD; (UNITED KINGDOM) I-COVER (SCREENING) LIMITED; (FRANCE) SQUARE FACTS SAS; (INDIA) ICOVER INDIA INFORMATION AND SERVICES PRIVATE LIMITED.

Information for California residents. We do not sell your personal information as the terms “sell” and “personal information” are defined by the California Consumer Privacy Act (the “CCPA”). Any questions or requests regarding the processing of your personal information in respect of your rights under the CCPA should be directed to privacy@icover-services.com.

5. Automated decisions

We may process using automated-decisions-making in a context of conducting an Identity Verification Right To Work, Right To Rent, DBS checks, using the requirements of the UK Digital Identities Trust Framework to identify fraud. Where an IVS is not successful or if there is a fraud suspicion, your verification will be subject to human intervention for further processing.

You have the right to object to automated decisions made about you. In this case, you must contact us [HERE](https://www.kyorchestra.io/Candidates/#Contactus) (<https://www.kyorchestra.io/Candidates/#Contactus>) and your verification will be subject to human intervention.

6. Security measures

We use accepted standards of physical and technical measures and require our hosting partners to use the same standard of care to protect personal information. Despite our best effort to protect personal information, the transmission of information via the internet is not completely secure. Once we have received your information, we will use strict procedures and security

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features to try to prevent unauthorised access. More information about our security measures can be found in our standard privacy policy.

We also maintain procedures to identify, respond to, and resolve any suspected personal data breaches. We will notify you and any applicable regulatory authority of a suspected or confirmed personal data breach without undue delay as legally required and within the timeframes required by law. If you believe your information may have been compromised or if you notice any suspicious activity, please contact us immediately at privacy@icover-services.com.

7. Your rights

You have the following rights in relation to the personal information we hold about you:

Your right of access or Subject Access Request: If you ask us, we'll confirm whether we're processing your personal information and, if necessary, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.

Your right to rectification: If the personal information we hold about you is inaccurate or incomplete, you are entitled to request to have it rectified. If you are entitled to rectification and if we've shared your personal information with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

Your right to erasure: You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable). If you are entitled to erasure and if we've shared your personal information with others, we'll let them know about the erasure where possible. If you ask us, where it is possible



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and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

Your right to restrict processing: You can ask us to 'block' or suppress the processing of your personal information in certain circumstances, such as where you contest the accuracy of that personal information or you object to us. If you are entitled to restriction and if we've shared your personal information with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

Your right to data portability: You have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine-readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

Your right to object: You can ask us to stop processing your personal information, and we will do so, if we are: (i) relying on our own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing; or (ii) processing your personal information for direct marketing purposes.

Your right to withdraw consent: If we rely on your explicit consent as our legal basis for processing your personal information, you have the right to withdraw that consent at any time. In this case, we will not be able to proceed with the identity verification service.

Your right to lodge a complaint with the supervisory authority: If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the relevant supervisory authority.

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Please note that some of these rights may be limited where we have an overriding interest or legal obligation to continue to process the data.

For non-UK/EU residents, your rights may vary. Please refer to your local data protection authority for specific rights and obligations that may apply to you.

To exercise your data privacy rights, please use this [forms](#) for any request, we will acknowledge receipt of your request within 96 hours and have up to 30 days to provide you a response.

8. Children's Privacy

Our Identity Verification Service ("IVS") is intended for individuals 18 years of age or older. We do not knowingly collect or process personal data from individuals under this age. If you are under 18, you must not use our services. Should we discover that data from an individual under 18 years has been collected, we will delete it promptly in accordance with our policies.

9. General provisions

Amendments. Any changes made to this Policy from time to time will be published on the Platform. Any material or other change to the data processing operations described in this Policy that is relevant to or impacts on you or your personal data will be notified to you. In this way, you will have an opportunity to consider the nature and impact of the change and exercise your rights under the GDPR in relation to that change (e.g., to withdraw consent or to object to the processing) as you see fit.

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Main Privacy Policy. For more detailed information on our global data protection practices, please see our Main Privacy Policy at www.icover-services.com/privacy-policy. Please note that the Main Privacy Policy excludes biometric data, which is covered by this dedicated Policy.

Contact. If you have any comments or questions about our privacy policy or our processing of your information, please contact iCOVER – Data Protection Office – 1 rue de la Bourse, 75002 Paris or privacy@icover-services.com

Complaint. For further information on the protection of personal data or the issuing of a complaint, you can visit:

- the website of the Commission Informatique et Liberté (“CNIL”), www.cnil.fr
- the website of the Information Commissioner’s Officer (“ICO”), <https://ico.org.uk/> where we are registered under number Z1637061

We are available for you and we would appreciate the chance to deal with your concerns as a first step before you approach the Data Protection Authority. Please do not hesitate to contact us at privacy@icover-services.com.