



Citco Group of Companies
Data Protection Notice for Citco Verify
powered by ID-Pal Biometric ID Verification

September 2022

CITCO

Citco Data Protection Notice for Citco Verify powered by ID-Pal 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 Citco Verify, the identity verification app powered by ID-Pal (the “**ID-Pal App**”) if you do not agree with the ways in which we will process Your Information.

The Citco Group Limited and its subsidiaries and affiliates (together “**Citco**”) has established this Data Protection Notice 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. Citco is the Data Controller of your information.

1. Biometric Data Defined

For the purpose of this Data Protection Notice, “**biometric data**” means personal data stored by Citco (or ID Pal acting for and on behalf of Citco) that can be used to identify a person such as fingerprints, voiceprints, facial shape, or scan of hand or face geometry (biometric identifiers). Biometric data includes biometric information (information, regardless of how it is captured, converted, stored, or shared based on an individual's biometric identifier used to identify an individual). Where the EU General Data Protection Regulation applies, biometric data is recognised as “special category” personal data requiring additional measures not required for standard forms of personal data.

2. Scope

The processing of Your Information governed by this Data Protection Notice for Biometric ID Verification includes processing by use of 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 Citco. References to “**we**”, “**us**”, or “**our**” are to Citco and/or ID-Pal as the context requires.

By “**Your Information**” we mean the personal 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. The biometric information primarily applicable and relevant to this Data Protection Notice for Biometric ID Verification is facial shape and scan of face geometry for the purpose of conducting anti-money laundering verification checks required by applicable laws and regulations.

3. 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. However, it may be necessary to provide Citco with an alternative satisfactory form of identification verification for the purpose of conducting anti-money laundering verification checks required by applicable laws and regulations.

4. What information do we collect about you?

- photographic and video images of you, when you provide us with a “selfie” photo, video-clip;
- biometric data, when we compare your “selfie” photo against your photographic ID;

5. How do we collect your information?

- directly from you; when you submit your information through the ID-Pal app.

6. Legal basis for using Your Information

We rely on one or more of the following legal bases for using Your Information:

Purpose	Legal basis of processing
To conduct biometric identification and verification checks.	Explicit consent
To conduct anti-money laundering verification checks and fulfil our regulatory obligations in connection with the services.	Legal obligation Performance of a contract (that you are a party to) Public interest (where EU anti-money laundering legislation applies)

7. 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);
- Clients of which you are a related person;
- 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.

8. 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 privacy@citco.com.

9. For how long do we keep Your Information?

Where necessary, we will keep Your Information while conducting anti-money laundering verification checks required by applicable laws and regulations and for a period of time after that. However, we will not hold your personal information for longer than necessary and at all times one or more legal basis exist that enable us to lawfully retain your personal information for the determined duration(s).

Where your personal is obtained and processed by reason of your consent, we will retain your personal data only for as long as you continue to consent to us retaining that personal data for the purposes that you had consented to.

10. 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 be used to help satisfy the identity verification qualifications required by applicable laws and regulations.

11. 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 risk 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.

12. Contact Us

If you have any questions, concerns or complaints regarding our compliance with this Data Protection Notice 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.

c/o Citco Technology Management (Ireland) Limited
Custom House Plaza, Block 5, IFSC Dublin 1, Ireland

Privacy Team Email: Privacy@citco.com

Data Protection Officer Email: dpo@citco.com

Phone #: Toll Free: +1 800 457 2251 / Americas: +1 201 793 5858 / Europe: +41 22 591 1212

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