

# KY ORCHESTRA

## PRIVACY POLICY

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## 1. Introduction

The iCOVER Group (“**iCOVER**” or “**We**”) is a French headquartered group specialized 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 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 EU national laws implementing or supplementing the same (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.

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](mailto:privacy@icover-services.com)

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### 2. Processing and deletion of personal data

While providing IVS, our clients engage 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 define 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

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**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

### 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 utility bill and compare it to the address held by a trusted data provider

**Why ?** To confirm your current address

Upon completion of the identity verification service, a report is provided to our clients to assist them conduct digital “Disclosure and Barring Service”, “Right to Work” and “Right to Rent” checks on you.

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

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### 2.3. Deletion of personal data

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

	<b>Verification successful</b>	<b>Verification not successful</b>	<b>Verification not successful and including a fraud suspicion</b>
<b>Identification</b>	3 days from the closing of IVS	30 days from the closing of IVS	As long as necessary
<b>Document data</b>	3 days from the closing of IVS	30 days from the closing of IVS	As long as necessary
<b>Biometric data</b>	3 days from the closing of IVS	30 days from the closing of IVS	As long as necessary
<b>Address data</b>	3 days from the closing of IVS	30 days from the closing of IVS	As long as necessary

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

### 2.4. Legal basis for the processing

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We process your personal data for the provision of IVS 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. Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be found by [Fair Processing Notices for Cifas](https://www.cifas.org.uk/fpn) (<https://www.cifas.org.uk/fpn>)

### 4. Transfer of personal data

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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.** 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](#) or refer to the "Fraud Prevention Agencies" section ;
- **Third-party service providers** that are involved in IVS Unissey for Biometric Verification and Experian CrossCore for Address History verification. For Experian CrossCore, a record of the search will be kept on the individual's credit report.

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

### 5. Automated decisions

We may process using automated-decisions-making in a context of conducting a Right To Work, Right To Rent, DBS checks, under the scheme 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](#) and your verification will be subject to human intervention.

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

### 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.



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**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 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.

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**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.

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.

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. 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.

**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,



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75002 Paris or [privacy@icover-services.com](mailto: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](http://www.cnil.fr)
- the website of the Information Commissioner’s Officer (“ICO”), <https://ico.org.uk/> where we are registered under number Z1637061