

## Age Verification Service Privacy Policy

Version 1.0

Effective from: 20.12.2023

| Document Information |  |
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| Name                 | Age Verification Service Privacy Policy                        |
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| 1.0                  | First public version (Age Verification Service Privacy Policy) |
| Effective from date  | 20.12.2023   |

## 1. General information

This Privacy Policy describes how SK ID Solutions AS (hereinafter referred as "SK") as a data controller ensures the protection of your personal data in accordance with applicable laws while offering Age Verification Service.

### Our contact details:

#### SK ID Solutions AS

**Address:** Pärnu Ave. 141, 11314 Tallinn, Estonia

**Registry code:** 10747013

**Phone:** +372 610 1880

**E-mail:** [info@skidsolutions.eu](mailto:info@skidsolutions.eu)

**Data Protection Officer:** [dpo@skidsolutions.eu](mailto:dpo@skidsolutions.eu)

## 2. Definitions

### What is Age Verification Service?

Age Verification Service is a service that issues confirmation regarding your age without revealing any personal data of you to the Relying Party. SK as an Age Verification Service provider authenticates you and extracts from the authentication certificate data your birth date and calculates your age based on this. As a result, only the confirmation that you as an anonymous consumer are at least of the required age is provided to the Relying Party.

### Who is Relying Party?

Relying Party is a provider of the age-limited service, who requests your age verification from SK and relies on the confirmation issued by SK that you are at least of the required age.

### What is Authentication Certificate?

Authentication certificate is digital data that facilitate electronic identity verification and in which the public key relates to the natural person who owns the certificate. When you are authenticating yourself by entering PIN code, your personal data from the certificate (e.g. name and personal identification number) is sent to the service provider who required authentication (to SK, in case of Age Verification Service).

### What is GDPR?

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons regarding the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.

## 3. What personal data we process?

For providing Age Verification Service to you we collect and process the following personal data:

- **Authentication data** - the data you enter to initiate the authentication (e.g. personal identification code or phone number).
- **Authentication Certificate data** - we extract your date of birth from the certificate and calculate based on that **if your age meets the age requirement of Relying Party or not** (using UTC+2 time).
- **History of your age verification transactions** - at which Relying Party and when you used Age Verification Service.

## 4. Purpose and lawfulness of processing personal data

The personal data we process is provided to us directly by you by authenticating yourself. We process your personal data to verify your age and confirm to Relying Party if you are at least of the required age. We share to the Relying Parties only the confirmation about your age either meeting or not the requirement of Relying Party. No personal data will be revealed to Relying Parties.

Under the GDPR, the lawful basis for processing this information is contractual obligation. This means that we need to process above-mentioned personal data to provide to you Age Verification Service. We have determined which personal data SK needs to provide this service and are keeping the amount of personal data processed to a minimum.

## 5. How we store your personal information and to whom we disclose it?

SK has adopted necessary organisational, physical and information technology security measures to ensure the integrity, availability and confidentiality of the data.

We have mapped the personal data we need for providing the service and specified the purpose, extent and period of time, we need to store such data. We have laid down requirements and instructions for SK's employees, how to process personal data in a correct way. We grant access to personal data only for employees, who have passed relevant trainings and background check. SK's employees are aware that they have the right to process personal data only to the extent necessary for them to carry out their duties.

The processing of your personal data is legitimate, fair, fit for purpose, minimal, secure and transparent. All our activities are guided by applicable European Union and Estonian legislation, policies and principles of SK as well as the present privacy policy.

SK is certified under the standard ISO/IEC 27001: 2013 "Information technology. Security techniques. Information security management systems." This is a standard, that sets requirements for the organization's information security system management processes and for critical information security assets, including technical, physical and organizational security measures to protect personal data.

We keep evidence about your age verification transactions (issued confirmations) for 12 months. SK is required to provide evidence to the Relying Party upon their legally substantiated request within 12 months after issuing confirmation on your age.

We do not disclose personal data to third parties unless:

- such an obligation arises from applicable legislation or measures adopted there under (e.g. providing information to law enforcement or investigation authorities);
- you have given written consent to disclose the information to other third parties.

## 6. Your data protection rights

Under GDPR, you have the following rights:

**Right of access** - You have the right to ask us confirmation about processing your personal data and copy of your personal data.

**Right to rectification** - You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete data you think is incomplete.

**Right to erasure** - You have the right to ask us to erase your personal data in certain circumstances.

**Right to restriction of processing** - You have the right to ask us to restrict the processing of your personal data in certain circumstances.

**Right to data portability** - You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.

To exercise the rights listed above, please send electronically signed request to the e-mail [info@skidsolutions.eu](mailto:info@skidsolutions.eu). We will respond to your request within 30 days. You can access your Age Verification Service transactions also in MyID portal: <https://myid.skidsolutions.eu/>.

## 7. How to complain

If you have any concerns about SK's use of your personal data, we ask you to send an electronically signed complaint via e-mail to [dpo@skidsolutins.eu](mailto:dpo@skidsolutins.eu). We will reply to your e-mail within 30 days.

If you find that SK is not processing your personal data in accordance with the relevant legislation, you also may file a complaint to your national data protection authority (e.g. Estonian Data Protection Inspectorate, Latvian Data State Inspectorate, Lithuanian State Data Protection Inspectorate).

## 8. Amending this Privacy Policy

SK has the right to unilaterally alter this privacy policy in accordance with the requirements laid down in applicable legislation. The amendments will be published on [SK's website](#) and will immediately enter into force.