

# Privacy Policy

## Keesing AuthentiScan

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### Approval

<b>Name</b>	<b>Position</b>	<b>Signature</b>	<b>Date</b>

## Introduction

Keesing Reference Systems B.V. takes your privacy very seriously. This policy contains important information about what to expect when Keesing Reference Systems B.V. processes personal information about you and your customers and how we will use the personal data. Please read this policy carefully to understand our views and practices regarding your personal data.

Keesing AuthentiScan is an application that provides for a simple way of verifying the authenticity of identity documents. The identity document can be uploaded to the AuthentiScan solution for verification. A summary of the verified documents is available to the customer and can be used to easily retrieve and review previously performed verifications.

Keesing AuthentiScan can be accessed via the following websites:

<https://www.keesingauthenticscan.com>

<https://www.keesingauthenticscan.no> (for Norwegian accounts)

## Contact Information

Keesing Reference Systems B.V., Hogehilweg 17, 1101 CB AMSTERDAM, The Netherlands

### 1. This policy applies to information we collect about:

- Keesing registers customer information and a contact person on account level and user level.
- Keesing customer contacts who mail/phone Keesing for incidents, questions or remarks.
- Personal data of the data subject we process on your behalf during the document verification process.

## What is our role?

### Controller

- Keesing Reference Systems B.V. = Data controller of customer account information

### Processor

- Keesing Reference Systems B.V. = Data processor of personal data of the data subject captured during Document verification process

(Purpose of processing) The Processor is committed to process personal data at the request of the Responsible (customer) under the terms and conditions of the Processing Agreement.

When Keesing processes the information of the data subject we do this in accordance with the instructions of the Customer. As stated above, Keesing is the Data Processor. If you are the Data Subject, the Customer is the Data Controller of the information. The Customer will determine why, what and how your information is collected, used, shared and retained.

## The information we collect about you in Keesing AuthentiScan as a Data Controller

When you do business with us, register for our service, Keesing Reference Systems B.V. may collect the following personal information from you:

- Account name
- User name
- Initial Password (hashed) (this password needs to be changed at first logon)
- E-mail address
- Telephone number
- The general business administration of Keesing Reference Systems B.V. entities.
- Additional information dependent on the sub-product, such as address, mobile telephone number
- Information that is provided during registration, including name and business name, VAT number, Financial details including card details, bank details.

## Keesing Reference Systems B.V. working on client behalf

We may pass your information to our partners for the purposes of completing tasks and providing services on your behalf (for example with external database lookups). However, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires to keep your information secure and not to use it for own purposes. Please be reassured that we will not release your information to third parties for them to use for their own direct marketing

purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

## **Resellers we work in association with:**

We work closely with various resellers to bring you a range of quality and reliable products and services designed to meet the needs of the client. When you enquire about or purchase one or more of these products, the relevant reseller will use your details to provide you with information and carry out their obligations arising from any contracts you have entered with them. Resellers may contact you directly, but only to the extent necessary to provide the service. In case a reseller acts as a processor of your data, he is required to conclude a separate processing agreement.

## **Internet browser settings and Cookies**

Our website uses cookies. Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. We use analytics cookies to collect information on how visitors interact with our website and to enable us to maintain and develop it.

How we protect your information

We store all information you provide to us on our secured servers. We have taken all the measures to secure any connection to this data. Once we have received your information, we will use strict procedures and security features to prevent unauthorized access.

## **Access to your information and updating and correcting your information**

You have the right to request a copy of the information that we hold about you. If you would like more information about your personal information, please send an email to [gdpr@keesingtechnologies.com](mailto:gdpr@keesingtechnologies.com)

We want to ensure that your personal information is accurate and up to date. If any of the information that you have provided to Keesing Reference Systems B.V. changes, for example if you change your email address or name, please let us know the correct details by using the facilities on the website or sending an email to [helpdesk@keesingtechnologies.com](mailto:helpdesk@keesingtechnologies.com). You may ask us, or we may ask you, to correct information you or we think is inaccurate, and you may also ask us to remove information which is inaccurate.

## **Your consent**

Through registering into our services, you consent to the use of the information you provide in that connection as set out in this policy. If you provide us with sensitive information, whether for logging in, or for any other purpose, you expressly consent to our using that information for monitoring.

## **Changes to Privacy policy**

We keep our Privacy policy under regular review. If we change our Privacy policy we will post the changes on this page, and place notices on other pages of the website, so that you may be aware of the information we collect and how we use it at all times. This Privacy policy was last updated on 25th March 2018.

## Data Protection Principles

Keesing Reference Systems B.V. has adopted the following principles to govern its collection, use, retention, transfer, disclosure and destruction of Personal Data:

- Principle 1: Lawfulness, Fairness and Transparency

Personal Data shall be processed lawfully, fairly and in a transparent manner in relation to the Data Subject. This means, the client of Keesing Reference Systems B.V. must tell the Data Subject what Processing will occur (transparency), the Processing must match the description given to the Data Subject (fairness), and it must be for one of the purposes specified in the applicable Data Protection regulation (lawfulness).

- Principle 2: Purpose Limitation

Personal Data shall be collected for specified, explicit and legitimate purposes and not further Processed in a manner that is incompatible with those purposes. This means Keesing Reference Systems B.V. must specify exactly what the Personal Data collected will be used for and limit the Processing of that Personal Data to only what is necessary to meet the specified purpose.

- Principle 3: Data Minimization

Personal Data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are Processed. This means Keesing Reference Systems B.V. does not store any data outside the agreements with the customer. The customer will determine why, what and how your information is collected, used, shared and retained.

- Principle 4: Accuracy

Personal Data shall be accurate and, kept up to date. This means Keesing Reference Systems B.V. must have in place processes for identifying and addressing out-of-date, incorrect and redundant Personal Data.

- Principle 5: Storage Limitation

Personal Data shall be kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the Personal Data is Processed. This means Keesing Reference Systems B.V. does not store any data outside the agreements with the customer. The customer will determine why, what and how your information is collected, used, shared and retained.

- Principle 6: Integrity & Confidentiality

Personal Data shall be Processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorized or unlawful Processing, and against accidental loss, destruction or damage. Keesing Reference Systems B.V. must use appropriate technical and organizational measures to ensure the integrity and confidentiality of Personal Data is maintained at all times.

- Principle 7: Accountability

The Data Controller shall be responsible for and be able to demonstrate compliance. This means Keesing Reference Systems B.V. must demonstrate on behalf of the client that the six Data Protection Principles (outlined above) are met for all Personal Data for which it is responsible.

## **How to contact Keesing Reference Systems B.V.**

We welcome your views about our website and our Privacy policy. If you would like to contact us with any queries or comments, please send an email to [gdpr@keesingtechnologies.com](mailto:gdpr@keesingtechnologies.com)