



Privacy Policy: itsme APP & Services

This privacy policy (the "Privacy Policy") applies to (i) the itsme Application (hereafter the "itsme App" or the "App") developed by Belgian Mobile ID SA/NV as well as (ii) the services provided by Belgian Mobile ID SA/NV to its business or private customers.

The itsme App allows its users (hereafter the "Users") to share data with, access/log-into and confirm transactions through websites and/or different mobile applications (as made available by Service Providers). The itsme App also allows the Users to electronically sign documents, using a qualified certificate on a qualified signature creation device (hereafter all services together -actual and future- the "itsme Services").

The App is made available by Belgian Mobile ID NV/SA, whose seat is registered at Sint-Goedeleplein 5, 1000 Brussels, Belgium, under number 0541.659.084 – RPM Brussels (hereafter Belgian Mobile ID, we or us).¹

The itsme Services are made available by Belgian Mobile ID with the intervention of the following third parties (hereafter jointly referred to as the "Belgian Mobile ID Members"):

- **Service Providers:** providers of services or goods or any other third party with whom you use the App to register with them, or log into their website/app, approve a transaction or sign a document.
- **SIM Controllers:** your telecommunications operator.
- **Identity Registrars:** entities that can verify your identity, such as your bank.

When providing the itsme Services Belgian Mobile ID acts as data 'controller' under the applicable Belgian privacy laws, and as such Belgian Mobile ID is responsible for the collection and use of your personal data.

The following policy explains among others (i) the different types of personal data that will be collected, (ii) the purposes of collection, (iii) any sharing of that data with third parties, (iv) your rights as the data subject and (v) the measures taken to protect your personal data. Please note that the itsme Services necessarily imply that we will collect and store personal data pertaining to you and that we will communicate some of your personal data to third parties, as described below.

This Privacy Policy only describes the processing of personal data performed by us or on our behalf in the context of the itsme Services – the SIM Controllers, Service Providers and Identity Registrars also process your personal data as data controllers in the context of their own services or activities; for those processing activities please refer to their privacy policies.



0. MODIFICATIONS COMPARED TO THE PREVIOUS VERSION OF THIS PRIVACY POLICY AND ENTRY INTO FORCE OF THE NEW VERSION

This updated privacy policy will become applicable as from January 31st, 2021.

you will find below the list of modifications compared to the previous version of our privacy policy:

- Chapter 1 :
 - Modifications to the list of Identity data
- Chapter 2 :
 - Clarifications and modifications regarding the legal ground for processing personal data.
- Chapter 3 :
 - Clarifications and modifications regarding the purposes for processing personal data.
- Chapter 6 :
 - Update of the encryption system
 - Localization of our data centers (in the EEA instead of Belgium and Ireland)
- Chapter 7 :
 - Clarification and modifications regarding transfer of Data
- Chapter 8 :
 - Precision regarding the timing of the notification of changes to the privacy policy

1. THE PERSONAL DATA WE COLLECT AND HOW

1.1. THE PERSONAL DATA WE PROCESS

In order to offer the itsme Services and operate the App as set out in this Privacy Policy and the General Terms and Conditions, we process different categories of personal data:

- **Identity Data**, which allows us to identify you. These cover various kinds of data:
 - core identity data, consisting of the data which allows us to identify you (for instance your full name, gender, legal address, nationality, date and place of birth, ID-Card Number and ID picture (all as recorded on any official document that we accept to verify your identity, such as your ID card, your passport, etc.);
 - The unique identifier linked to your identity in your country of residence (such as, with regard to Belgium, the National register number). Such unique identifier, will only be used within the boundaries set by, and in accordance with, the applicable local laws and regulations ;
 - Biometric data (processed to comply with our legal obligations and, in cases where it is necessary, after having obtained explicit consent from the User); in all cases biometric data will not be processed before having informed you clearly of the processing;
 - Contact information (email address and mobile phone number);
 - Different user and preference settings, e.g. your shipping address or the specific capacity in which you act (as employee of a specific company, for instance).
- **Security Data**, which are necessary in order to verify your identity as the User and to link your phone to your account, i.e. details regarding your device (brand, version, rooted or not device, ...), your device's operating system (OS and version), the version of the itsme App on your device, the status of your subscription with your mobile operator and the country in which you are (including but not limited to the device identifier ("IMEI"), the SIM card ("IMSI" or "ICCID"), the code of your mobile network operator (identifying your mobile network operator, "MNC") and the mobile country code (identifying the country in which you are, "MCC"). When you enrolled for the itsme Services, you consented to the transfer of some of the Security Data by the SIM Controller to Belgian Mobile ID; the other elements of the Security Data are collected directly via your device.



- **Operation Data**, which are the records of specific operations carried out through the App and their characteristics, covering for example, to which entity information is sent, when it is sent and concerning which transactions.
- **Enrolment Data**, which are specifics regarding the registration process and cover information such as your consent to our Terms and Conditions and this Privacy Policy and the date and time of enrolment.
- **Signature Data, which** are all such information, including personal data, as are necessary in accordance with the applicable law in order to provide the services of validating the electronic signature (Signature Validation data) or creating qualified electronic signature (**Signature Creation data**), under Regulation (EU) No 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC) (the “**eIDAS Regulation**”).

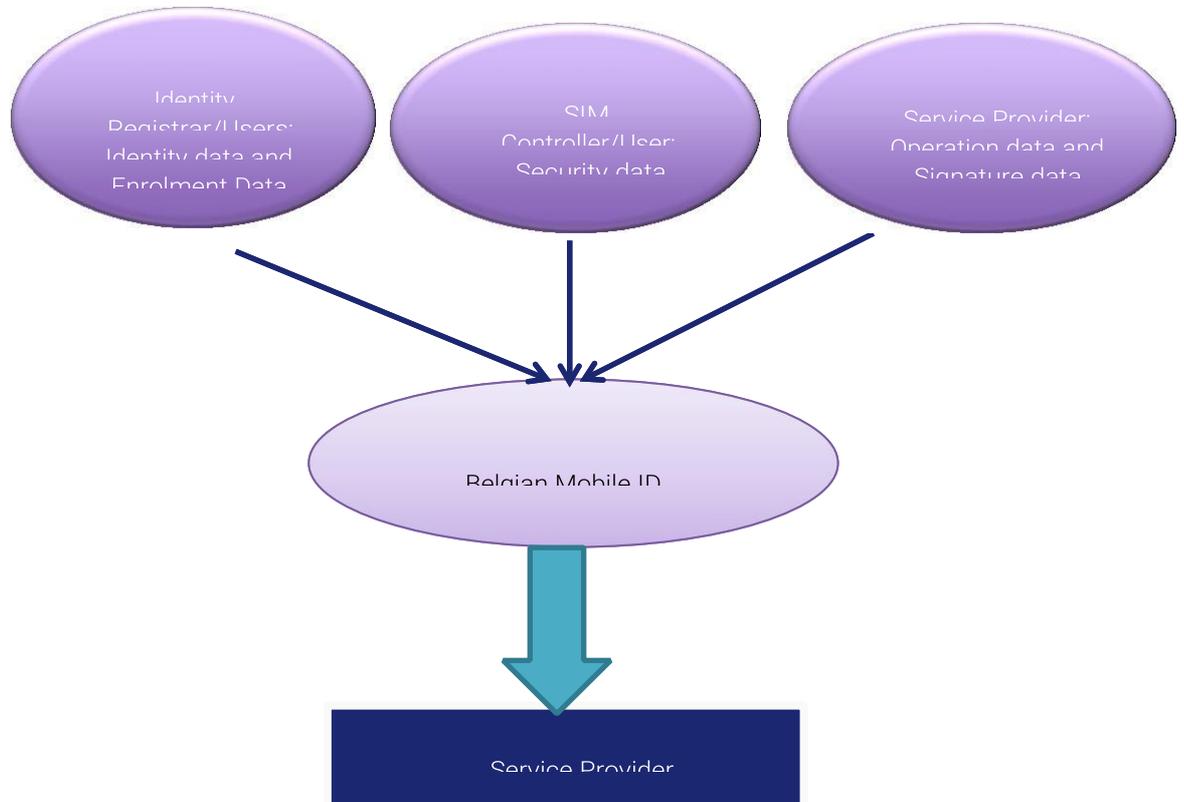
All the data mentioned above are mandatory in order to benefit from the App’s functions and Mobile ID Service concerned.

We only process such data as are necessary for the purposes of the App’s functions and the itsme Services concerned and we only process data that is, in relation to said functions or services, adequate, relevant and limited to what is necessary. We could process other data elements on a voluntary basis, but in such case, we would inform you and ask for your consent thereto.

Aside from the information set forth above, we could process other data elements such as **Usage and Device Information**. Usage and Device Information relates among others to data regarding (i) the App version, the device model, OS and language used, (ii) a country in which the App or Service is used, gender, age category and interests; and (iii) usage data relating to how often the App is used, what happens within the App, aggregated usage and performance data, App errors and debugging information, and where the Apps were downloaded from.

itsme may also process your national identifier number (such as the Belgian national register number NRN, Dutch Burgerservicenummer BSN) in the context of your identification and/or authentication if you wish to gain access to websites or applications offered by private entities or by public authorities or governmental institutions. When doing so, Belgian Mobile ID shall at all times act in accordance with the relevant national legal obligations (BSN-legislation in the Netherlands and, regarding the Belgian national register number NRN, the Law on the National Register of Natural Persons in Belgium specifically for the Belgian and more specifically its Article 8, which is the legal basis for Belgian Mobile ID’s processing of the NRN) and with this Privacy Policy.

1.2. HOW PERSONAL DATA ARE COLLECTED



The different categories of personal data described are either collected directly from you or by a Belgian Mobile ID Member as follows:

- **Identity Data** is collected either directly from you or from the Identity Registrar you enrolled with for the App. When you enrolled with them, you consented to the transfer of your Identity Data to Belgian Mobile ID. We may also update your Identity Data after having verified it. In that context, Identity Registrars may from time to time send us updates regarding your Identity Data.
- **Security Data** is obtained either directly from your phone (the location data, i.e. the country in which you are ("MCC") and your telecom operator ("MNC")) or from the SIM Controllers (details regarding your device (IMEI) and your SIM card (IMSI)).
- **Operation Data** is a mixture of data generated by the App itself and data received from Service Providers.
- **Enrolment Data** is created when registering for an itsme account. Enrolment Data is obtained either directly from you, when registering through the itsme website, or through the Identity Registrar.
- **Signature Data** is a mixture of Identity data (collected directly from you or via our Identity Registrar(s)) and Operation data (received from the Service Provider(s)).
- **Usage and Device Information** can be collected when you enroll and use the App.



2. ON WHAT LEGAL GROUNDS DO WE PROCESS THE PERSONAL DATA?

We only process your personal data on the basis of one of the following legal grounds:

- **processing that is necessary for the performance of the contract** between you and Belgian Mobile ID (including the preparation, execution and termination of the contract): e.g. carrying out the operations you request to perform with the App and more generally, the operation of the App and performance and itsme Services (including the creation of a signing certificate when you use the service of signature creation);
- **processing for which you have given (explicit) consent – it being understood that Belgian Mobile ID will at all times ensure that that consent is compliant with the applicable laws and regulations:** e.g. processing biometric data to verify your identity when you register (for the first time or afterwards, when you unblock your account, for instance) for an itsme account. Please note that the processing of biometrics data can also be done to comply with applicable legal requirements;
- **processing that is necessary for the purposes of the legitimate interests** pursued by Belgian Mobile ID: e.g. the operation, evaluation and improvement of the services offered by Belgian Mobile ID;
- **processing that is necessary for compliance with a legal obligation to which** Belgian Mobile ID is subject: e.g. with regard to the prevention of money laundering or to respond to requests from competent authorities in this context. Specifically with regard to processing of the Belgian national register number NRN, Belgian Mobile ID bases itself on Article 8 of the law of 8 August 1983 on the regulation of a national register of natural persons.

3. WHEN WILL THE DIFFERENT CATEGORIES OF DATA BE PROCESSED?

We generally use your personal data to provide you with the itsme Services, it being understood that this includes:

- carrying out the operations you request to perform with the App and more generally, the operation of the App and performance and itsme Services, for the first time or afterwards, when you unblock your account, for instance (including the creation of a signing certificate when you use the service of signature creation); Please note that the processing of biometrics data can also be done to comply with applicable legal requirements
- the operation, evaluation and improvement of the services offered by Belgian Mobile ID, such as: (i) communicating with you (customer support, reviews of our products and services, information on new products and features, etc.), (ii) monitoring the usage of the itsme App after a publicity or marketing campaign, (iii) analyzing Belgian Mobile ID's products, services and websites, (iv) facilitating the functionality of the App and (v) performing accounting, auditing, billing, reconciliation and collection activities; and
- fraud management and risk management.

3.1. WHEN WILL IDENTITY DATA BE PROCESSED AND HOW:

- **Registering for the itsme Services (for the first time or each time you reactivate your account):** we will collect and verify your identity data the first time you register for the itsme Services (either via an Identity Registrar or directly from you) after you agreed thereto.
- **Informing you** on the itsme® Services and Belgian Mobile ID
- **Updating your Identity Data:** from time to time, we will update your Identity Data in our database. This will be done only after the updated elements of Identity Data have first been verified. In that context, Identity Registrars may, on a periodic basis, communicate updated elements of Identity Data to us.
- **Registration with a Service Provider:** When you register for the first time with a Service Provider through the App, your consent is requested. This is because in such case we will have to transfer elements of your identity data to them. you will be asked to consent to each data transfer and to any request for additional personal data should it arise.
- **Logging-in and Confirming a Transaction:** Depending on the technical interface Service Providers choose, Identity Data may have to be communicated to them for log-in and approval operations.



- **Signature creation or validation:** when you use the itsme App to electronically sign a document or when we are requested to verify an electronic signature, we process elements of Identity data of the signatory (you, when you use the itsme App to sign a document) to create the signature or verify its validity; in case of signature creation, those elements will be communicated to the Service Provider as part of your signature. When you do not have a valid signing certificate in your name, some of your Identity Data will also be communicated to the certificate authority for the creation of that signing certificate.
- **Archiving:** Once you have terminated your use of the itsme Services or after a period of inactivity over two years, the data will be archived for evidentiary purposes for a period of 10 years (counting from the last transaction), after which they will be destroyed.

All elements of your identity data that are communicated to Service Providers will be processed by those Service Providers acting as data controllers in accordance with their own privacy policy. **Please note that** once elements of Identity data are transferred to the Service Providers we cannot control how they will process them nor do we assume any liability therefore. We advise you to read carefully the Service Providers' privacy policy before using our App to perform operations with them.

Please also note that if you intend to use your fingerprint or any other biometric authentication tool (such as FaceID) as a means of authentication in the itsme App other than for registering an itsme account, the fingerprint or any other biometric authentication tool that you register on your device, will not be transferred to Belgian Mobile ID in whatever form and will therefore not be processed by Belgian Mobile ID. Belgian Mobile ID only requests the biometric recognition function on your device to confirm that the biometric element used by you corresponds to the biometric element that has been logged by the device. The processing of your personal data in the context of the function of biometric recognition is subject to the privacy policy and terms and conditions of the manufacturer of the device.

3.2. WHEN WILL SECURITY DATA BE PROCESSED AND HOW:

- **A transaction requires identity verification:** we receive the Security Data partly from the SIM Controllers (IMSI and IMEI at the time of enrolment and in specific cases at the moment of a transaction with the App) and partly directly from your phone (data regarding your location and IMSI and IMEI for each transaction with the App). We store that information in our database for validation purposes and such data are stored as long as needed for such purposes. In certain limited cases, elements of the security data will be transferred to a Service Provider for purposes of fraud and risk management by that Service Provider.
- **Archiving:** Once you have terminated your use of the itsme Services or after a period inactivity over two years, the Security Data will be archived for evidentiary purposes for a period of 10 years (in case of transaction data, counting from the last transaction), after which they will be destroyed.

All elements of your Security Data that are communicated to Service Providers will be processed by those Service Providers acting as data controllers in accordance with their own privacy policy. **Please note that** once elements of Security Data are transferred to the Service Providers we cannot control how they will process them nor do we assume any liability therefore. We advise you to read carefully the Service Providers' privacy policy before performing transactions with them via our App.

3.3. WHEN WILL OPERATION DATA BE PROCESSED AND HOW:

- **Carrying out a transaction:** the App generates the Operation Data as you carry out different operations with Service Providers. The data generated will be logged for evidentiary purposes.
- **Informing you** of your past transactions in your historic in the App
- **Archiving:** the Operation Data will be archived for evidentiary purposes, for a period of 10 years (to be calculated starting from the relevant operation), after which they will be destroyed.

3.4. WHEN WILL ENROLMENT DATA BE PROCESSED AND HOW:

- **At the enrolment:** the Enrolment Data will be generated and collected at the time of your enrolment with the itsme Services;
- **Evidence and Archiving:** Enrolment Data is kept in database by either the Identity Registrar (acting as processor for Belgian Mobile ID) or directly Belgian Mobile ID for evidentiary purposes. Once you have terminated your use of the itsme Services or after a period of inactivity of two years, the data will be archived for a period of 10 years. After this period, the Enrolment Data will be destroyed.



Please note that by contacting our facilities, including the helpdesk services linked to the itsme App, you agree that messages (voice, text or otherwise) and any related technical information (such as the origin of communication, time and duration of the communication, claimed identities of the participants) may be recorded and stored for one month, in order to permit us to evaluate the effectiveness and performance of our contact facilities, and in order to address any attempted unlawful uses of our contact facilities or the itsme Services.

3.5. WHEN WILL SIGNATURE DATA BE PROCESSED AND HOW:

We process Signature Validation Data in order to provide services of qualified electronic signature validation, as prescribed by Articles 3(41), 32 and 33 of the eIDAS Regulation.

We process Signature Creation Data in order to provide services of electronic signature creation in accordance with the same eIDAS Regulation.

In this framework, we act as data controller in accordance with the applicable legal provisions, including in particular the eIDAS Regulation and the implementing regulations and derived technical standards. We provide these services in accordance with the applicable legislation on the processing of personal data, and we ensure in particular that only data that is adequate, relevant and not excessive for that purpose is processed. In the contractual terms on which we agree with the Service Providers and that govern our providing such services, we also ensure that all rules and principles of the data protection laws are fully complied with. In particular, we ensure that adequate and appropriate technical and organisational measures are implemented to safeguard the Signature Data that are processed and prevent unauthorized or unlawful processing of personal data and accidental loss, destruction or damage to the same personal data.

3.6. WHEN WILL USAGE AND DEVICE INFORMATION BE PROCESSED AND HOW:

Usage and Device Information can be processed when using the App. Such information is processed to conduct research and analysis of usage of, or interest in our App and Services. Such Usage and Device Information is collected with the aim of improving our Services and App (for instance, we may decide to change the look and feel or even substantially modify a given feature based on users' behaviour).

In order to carry out analysis on Usage Data and Information gathered by our App, we may use third party service providers such as Google Analytics - Firebase. Such Usage and Device Information are provided to such third party service providers such as Google in order to enable them to carry out data analysis. Any information which is provided to such third party service provider will become subject to such service provider's privacy policy. Any information provided to Google will therefore become subject to Google's privacy policy which is located here: <https://policies.google.com/privacy>. For further information on how Google's Firebase analytics tool uses data, please see the site "How Google uses data when you use our partners' sites or apps", (located at <https://policies.google.com/technologies/partner-sites>).

3.7. OTHER

We may process any category of personal data to evaluate, improve and ensure the services offered by Belgian Mobile ID are working as intended. This includes but is not limited to (i) communicating with you (customer support, reviews of our products and services, information on new products and features, etc.), (ii) monitoring the usage of the itsme App after a publicity or marketing campaign, (iii) analyzing Belgian Mobile ID's products, services and websites, (iv) tuning, enhancing, improving and facilitating the functionality of the App and (v) performing accounting, auditing, billing, reconciliation and collection activities, (vi) fraud management and risk management.

We may also process any category of personal data to comply with applicable legal requirements and industry standards and policies.

4. THE PERSONAL DATA WE SHARE

We do not sell or otherwise disclose personal data we collect about you to third parties, except as described in this Privacy Policy (here above and below). We will share personal data to enable the performance of itsme Services that you have chosen to use. In this respect, we may share your personal data with our members, including Service Providers, as described above.

We transfer data to third parties who process data in the context of performing or offering itsme Services on our behalf (subcontractors or value added resellers, which have integrated our services into their own platforms or applications and offer them to their customers or merchants with which we do not have a contractual relationship). Those actors act either as processors for us, or for the customers or merchants to which they offer their services. When acting as our processors, they



are not authorized to use the data or disclose it in any way except as here above described or to comply with legal requirements. We contractually require these third parties and our Members to appropriately safeguard the privacy and security of personal data they process on our behalf.

We also may disclose data about you: (i) if we are required to do so by law or legal process, (ii) to law enforcement authorities or other government officials in accordance with their competences, or (iii) when we believe disclosure is necessary or appropriate to prevent physical harm, or (iv) in connection with an investigation of suspected or actual fraudulent or illegal activity. Moreover, we can share Usage and Device Information with third party service providers for analysis purposes as set forth in point 3.6 above.

We also reserve the right to transfer any personal data we have about you in the event we sell or transfer all or a portion of our business or assets affecting the itsme App. Should such a sale or transfer occur, we will ensure that personal information you have provided to us remains to be treated in a manner that is consistent with this Privacy Policy.

5. YOUR RIGHTS AND CHOICES

5.1. ACCESS, RECTIFICATION AND DATA PORTABILITY

At any time, you may exercise your right to access and rectify any of your personal data that we may retain in relation to the itsme App, in accordance with applicable data privacy laws, either, as the case may be, through the App interface itself, or by sending a request with a copy of the front of your ID card, passport or other proof of identity to privacy@itsme.be, or in writing to Belgian Mobile ID NV/SA, Data Protection Officer (DPO), Sint-Goedeleplein 5, 1000 Brussels, Belgium.

Please note that some elements of your personal data can be accessed through the App's interface. As a User you have the right to rectify and modify those data at any time. However, because the itsme Services' security depends on the integrity of the core Identity Data, the modification of these Identity Data will only be possible after the modified elements have been verified: either through an Identity Registrar or via the itsme website (both of which require additional steps to verify your identity).

Finally, you also have the right to data portability in accordance with applicable data privacy laws. To that end, you can send a written request with a copy of the front of your ID card, passport or other proof of identity. Such request can either be sent by email to privacy@itsme.be or by regular letter to Belgian Mobile ID NV/SA, Data Protection Officer (DPO), Sint-Goedeleplein 5, 1000 Brussels, Belgium. In such case, Belgian Mobile ID will provide you or the recipient designated by you in your written request, a copy of such personal data in a CSV or similar format.

5.2. ERASURE

you may at any time exercise your right to data deletion in accordance with applicable data privacy laws, by sending a request with a copy of the front of your ID card, passport or other proof of identity to privacy@itsme.be, or in writing to Belgian Mobile ID NV/SA, Data Protection Officer (DPO), Sint-Goedeleplein 5, 1000 Brussels, Belgium. Belgian Mobile ID will refrain from using any of your personal data upon this request and will only continue to store any past personal data for evidentiary purposes over a period of ten years, after which they will be erased. After your data has been deleted, you will no longer be able to use the itsme Services. As soon as Belgian Mobile ID has received the erasure request, it will inform all Service Providers to whom Belgian Mobile ID has provided any of your identity data. Please note that this notification is for information of the Service Provider only and that the Service Provider will independently decide to continue using the data afterwards or not.

5.3. OBJECTION

When using the itsme App you could be requested to consent to certain data processing activities. you have the right to withdraw your consent to such activities at any time, by sending a request with a copy of the front of your ID card, passport or other proof of identity to privacy@itsme.be, or in writing to Belgian Mobile ID NV/SA, Data Protection Officer (DPO), SintGoedeleplein 5, 1000 Brussels, Belgium. Such withdrawal will not affect the lawfulness of past data processing. Please note that opposing to some processing can, however, affect your continued use of the App as Belgian Mobile ID cannot provide the itsme Services without processing necessary elements of your personal data.

At any point, should you deem that your rights have not been respected, you may also log a complaint with the Belgian Data Protection Authority, rue de la Presse, 35, 1000 Brussels, e-mail address: contact@apd-gba.be (see also www.dataprotectionauthority.be).



6. HOW WE PROTECT PERSONAL DATA

We maintain appropriate administrative, technical and physical safeguards to protect personal data against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of processing of the personal data in our possession.

The security measures we adopt depend on the different types of information collected and stored.

6.1. HOW WE ENSURE THE INTEGRITY OF STORED DATA

- **Encryption**

We encrypt all the data we store with different keys depending on the origin of the data.

When you provide personal data online, we use the industry standard for encryption on the Internet – Transport Layer Security (TLS) technology – to help protect the data that you provide. This internet encryption standard scrambles data as they are transferred from your device to our server. We also use digital certificates to ensure that you are connected to authentic channels.

- **Data Storage**

All of your personal data, whether used actively or archived, is stored in Belgian Mobile ID's servers and not the App itself. Belgian Mobile ID uses secured servers provided by a provider internationally certified ISO 27001 that are located in the European Economic Area to store the data.

- **Restricted Access**

Internal access to the personal data is limited on a strict 'need-to-know' basis. Only authorized personnel, whose activity will be monitored to prevent any misuse, will be able to access the personal data.

6.2. MEASURES PREVENTING MISUSE

Each operation with the itsme App is subject to strict authentication mechanisms.

7. DATA TRANSFERS

Belgium Mobile ID may (i) enter into agreements with Service Providers and suppliers located outside the European Economic Area whereby those have access to personal data or (ii) transfer personal data to entities located outside the European Economic Area (such as, for instance, the United Kingdom or the United States of America).

The level of data protection in countries outside the European Economic Area may be less than the level of data protection offered within the European Economic Area and transfers outside the European Economic Area. Belgian Mobile ID shall ensure that an adequate level of protection for such personal data is guaranteed by implementing one or more of the safeguards as set forth in Chapter V of the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("General Data Protection Regulation" or "GDPR")).

In case Belgian Mobile ID cannot rely on an adequacy decision taken by the European Commission under Article 45 GDPR for a data transfer outside of the European Economic Area, Belgian Mobile ID will enter into Standard Contractual Clauses (as approved by the European Commission) under Article 46.2 GDPR with the recipient of your personal data. In addition and where necessary, Belgian Mobile ID may take supplementary measures in order to ensure compliance with the level of protection guaranteed within the European Economic Area.

For more info about these safeguards: Please consult our website <https://www.itsme.be/legal/app-privacy-policy> or contact our DPO via contact-details below.

8. UPDATES TO THIS PRIVACY POLICY

This Privacy Policy may be updated periodically to reflect changes in our personal data practices. We will post a prominent notice on our websites and/or through the itsme App to notify you of any significant changes to our Privacy Policy and indicate at the top of the notice when it was most recently updated. We will ensure that you are informed of the changes sufficiently in advance thereof, taking into account the potential impact of the change on you.



9. HOW TO CONTACT US

If you have any questions or comments about this Privacy Policy, if you would like to exercise your rights, or to update the information we have about you or your preferences, please contact us here:

Belgian Mobile ID NV/SA

Sint-Goedeleplein 5

1000 Brussels

Belgium

Web: www.itsme.be/contact

Email: privacy@itsme.be