Privacy Policy

This Privacy Policy applies to the website www.itsme-ID.com (hereinafter "website") operated by Belgian Mobile ID SA/NV (hereinafter "Belgian Mobile ID" or "we").

The website has been established to keep the public and visitors (hereinafter "visitors" or "you") informed about Belgian Mobile ID products and services and in particular about the Application (hereinafter the "itsme® App" or "App").

This Privacy Policy explains the personal data that will be collected, the purposes of the collection, any sharing of that data with third parties, your rights as a data subject and the measures taken to protect your personal data.

Please note that this policy only covers the processing of personal data on the website. If you wish to obtain information about the processing of personal data carried out via the application, please consult the relevant policy via the following link: https://www.itsme-ID.com/legal/app-privacy-policy.

1. WHO ARE WE?

Belgian Mobile ID, whose registered office[1] is located at Rue du Marquis 1, 1000 Brussels, Belgium, under the number 0541.659.084, has developed and designed itsme® services (www.itsme-ID.com) allowing to:

- register digitally and identify themselves;
- approve transactions or orders remotely, and
- electronically sign or validate documents.

Belgian mobile ID acts as the "controller" of your data and, in this capacity, is responsible for the collection and use of your personal data obtained from or via the website.

2. WHY WE PROCESS YOUR PERSONAL DATA

2.1. MANAGEMENT OF THE WEBSITE

We collect and process personal data when you browse the website. This data includes, among other things, IP addresses and cookies. The latter are processed in order to ensure the proper functioning and security of the website, to improve your browsing experience, to perform retargeting and to measure the performance of our advertising campaigns. For these purposes, we use four types of cookies:

- necessary cookies;
- functional cookies;
- performance cookies;
- advertising cookies.

The processing of personal data obtained in this way is based on our legitimate interest in relation to the security and proper functioning of our website and on your consent in relation to the analysis of the use of our website, retargeting and the analysis of the performance of our campaigns. Except for essential cookies, we always ask for your consent via a cookie banner.

For more information, please see our cookie policy via the following link: https://www.itsme-ID.com/en/legal/cookie-policy.

2.2. NEWSLETTER

You have the possibility to give us your e-mail address so that we can send you newsletters.

[1] Registered with the competent Belgian authorities: Crossroads Bank for Enterprises

Category of personal data	Objective	Source of data	Legal basis	Storage period	Third parties with whom data is shared
E-mail address Name Last name Company name	Keep you informed of any developments related to our products and services	The person concerned	Consent	Until withdrawal of consent	Subcontractors who take care of our ICT infrastructure

2.3. RECRUITMENT

If you are interested in joining our team, you have the opportunity to submit your resume and cover letter. The processing of this information is based on the performance of pre-contractual measure. It is the candidate's responsibility to determine what data is relevant and to limit the sharing of information to what is strictly necessary for the hiring process.

Category of personal data	Objective	Source of data	Legal basis	Storage period	Third parties with whom data is shared
Identification data, contact details, work experience, and possibly other data that are transmitted via the resume or the cover letter	Hire employees	The person concerned	Execution of pre-contractual measures	1 year	Subcontractors who take care of our ICT infrastructure and service providers who are involved in the recruitment & hiring process

2.4. BUSINESS PORTAL

As a partner you have the opportunity to connect to the Belgian Mobile ID business portal if you need support to integrate itsme in your system. The processing of information via the portal is based on the performance of a contract.

Category of personal data	Objective	Source of data	Legal basis	Storage period	Third parties with whom data is shared
Identification data & contact details	Support partners integrating itsme in their system	Data subject	Performance of a contract	6 months if no customer agreement is concluded. Otherwise, the data will be stored as per the requirements of the contract.	Subcontractors who take care of our ICT infrastructure and subcontractors that are involved in the development and maintenance of the portal

2.5. WHITE PAPERS & LEAD MANAGEMENT

BMID provides access to informative white papers on its website. As a visitor, you have the privilege to download these valuable resources. To access these materials, we kindly request that visitors provide their contact information. Our sales department subsequently assesses each user as a potential lead, taking into account the user's profile and their company

affiliation, as an integral part of our lead management process. Should a prospect meet the criteria for being a potentially valuable lead, our sales department will initiate contact with them.

Category of personal data	Objective	Source of data	Legal basis	Storage period	Third parties with whom data is shared
Identification data & contact details	Lead generation and management	Data subject	Consent	2 years	Subcontractors who take care of our ICT infrastructure

If you consent to it we may also share your contact details to third party partners of itsme that provide signature services integrating our itsme Sign Service for their own lead generation and management. In such case, they will process your data as independent controllers. Any information provided to such third party will become subject to such third party's own privacy policy, which it shall provide to you.

2.6. SUPPORT

As a visitor to the website, you have the opportunity to contact Belgian Mobile ID, either as a user of the application or for commercial reasons. The processing of a contact form filled in by a visitor to the website is based on consent and it is the responsibility of the visitor in question to determine which data are relevant to his/her request and to limit the sharing of information to what is strictly necessary for the purpose of the request. If in doubt, we recommend that you only provide your identification data, your contact details and your request. Belgian Mobile ID will take care of identifying any additional information that is necessary for the request in question.

2.6.1. Users

Category of personal data	Objective	Source of data	Legal basis	Storage period	Third parties with whom data is shared
Identification data, contact details, application data and possibly other data that are transmitted via the attachment	Responding to the request for support	The person concerned	Consent	2 years	Subcontractors who take care of our ICT infrastructure and service providers who would be involved in the context of the request

2.6.2. Companies

Category of personal data	Objective	Source of data	Legal basis	Storage period	Third parties with whom data is shared
Identification data, contact details, job title, application data and possibly other data that are transmitted via the attachment	Responding to the demand for partnership	The person concerned	Execution of pre-contractual measures	2 years	Subcontractors who take care of our ICT infrastructure and service providers who would be involved in the context of the request
	Meeting the request for offer				
	Responding to the Sandbox request				
	Responding to the request for test accounts				

Identification data, contact details, function, question data, VAT number and possibly other data that are transmitted via the attachment	Sale of signature on Adobe Sign	The person concerned	Execution of pre-contractual measures	2 years	Subcontractors who take care of our ICT infrastructure and service providers who would be involved in the context of the request

If you consent to it we may also share your identification data, contact details and job titles to third party partners of itsme that provide itsme Services integrated within their own offering for their own lead generation and management. In such case, they will process your data as independent controllers. Any information which is provided to such third party will become subject to such third party's own privacy policy, which it shall provide to you.

2.7. EXERCISING THE RIGHTS OF DATA SUBJECTS IN RELATION TO PROCESSING CARRIED OUT BY BELGIAN MOBILE ID

In order to respond to the exercise of the rights of data subjects to our legally defined processing of personal data, we process the personal data necessary to respond to those requests.

Please note that when we process your personal data on the basis of legitimate interest, we always seek to maintain a balance between our legitimate interest and your privacy. Examples of "legitimate interests" are the improvement of Belgian Mobile ID services or the accurate identification of persons exercising their rights.

Category of personal data	Objective	Source of data	Legal basis	Data subjects	Storage period	Third parties with whom data is shared
Identification data, contact details, job title, application data and possibly other data that are transmitted via the attachment	Responding to the exercise of data subjects' rights	The person concerned	Legal obligation	Itsme® users	10 years	Subcontractors who take care of our ICT infrastructure and service providers who would be involved in the context of the request
				Non-users of the itsme® application	2 years	
Additional identification data	Confirm the identity of the adata subject	The person concerned	Legitimate interest	Users and non-users of the itsme® application	Time necessary for the identification	Subcontractors who take care of our ICT infrastructure

3. PERSONAL DATA WE SHARE

We do not sell or disclose the personal data we collect to third parties, except as described in this Privacy Policy.

We may share your personal data with related companies or third parties who process such data on our behalf. Where these service providers act as our data processors, we do not authorise them to use or disclose the data in any way except as specified in this Privacy Policy. We require such processors to adequately protect the confidentiality and security of the personal data they process on our behalf. You can find more information about the subcontractors we use and the security measures in place on the following page: https://www.itsme-id.com/legal/privacy-statement.

We may also disclose your personal data:

- if we are forced to do so by law or by legal proceedings;
- at the request of law enforcement authorities or public officials; or
- where we consider disclosure necessary or appropriate to prevent physical harm or financial loss; or
- in the context of an investigation into actual or suspected fraudulent or illegal activity.

4. EXERCISING YOUR RIGHTS

If you wish to exercise your rights or if you have a complaint, question or problem concerning the way we process your personal data, contact our Data Protection Officer via the following contact details.

Email: privacy@itsme-id.com

Mail: Rue du Marquis 1, 1000 Brussels, Belgium

User contact form: https://support.itsme-id.com/hc/en-us

If you contact us in order to exercise your rights, we will reply within 1 month. Exceptionally, this period may be extended (up to a maximum of 3 months), but in this case we will inform you of the reason within 1 month.

Whether or not you can exercise your rights depends on the processing operation and its legal basis. If the processing in question or its legal basis does not allow you to exercise a right, we will inform you within 1 month.

Always make sure you clearly state which right you wish to exercise and how you wish to receive the information (e.g. by e-mail, by post, verbally, etc.). Please note that in some cases you will need to provide us with additional information so that we can identify you with certainty and ensure that we are helping the right person.

4.1. ACCESS

You have the right to ask us about the personal data we hold about you and to request access to it. To this end, we can provide you with a copy of the data free of charge. Please note that this right of access is limited and that we cannot provide you with a copy of all documents as we are also obliged to respect the rights and freedoms of others.

4.2. RECTIFICATION

If you believe that your data is incorrect or outdated, you have the right to ask us to rectify it.

4.3. ERASURE

You have the right to ask us to delete your personal data. If we are legally obliged to retain certain personal data, we will not be able to comply with this request.

4.4. OBJECTION

You have the right to object to our processing and to ask us to stop processing your personal data.

4.5. RIGHT TO RESTRICT PROCESSING

You may ask us to restrict the processing of your personal data, in particular when we verify the accuracy of your personal data following a request for rectification.

4.6. RIGHT TO WITHDRAW YOUR CONSENT

For processing based on your consent, you have the right to withdraw your consent at any time.

4.7. RIGHT TO COMPLAIN TO THE DATA PROTECTION AUTHORITY

If you feel that any of your rights have been infringed, you have the right to complain to the Data Protection Authority via the following link: www.autoriteprotectiondonnees.be/citoyen/agir/introduire-une-plainte.

If you are not a Belgian resident, you have the right to lodge your complaint with your local data protection authority. Below is a link to the contact details of the competent data protection authority: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

4.8. RIGHT TO DATA PORTABILITY

For personal data collected on the basis of your consent or the execution of a pre-contractual and/or contractual measure, you have the right to the portability of your personal data. To this end, you have the right to receive or obtain the transfer to a person you designate of a copy of your personal data in CSV or similar format.

5. HOW WE PROTECT YOUR PERSONAL DATA

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

The security measures we take vary depending on the type of data being processed and how that data is collected and/or stored. When you provide personal data online, we use industry-standard internet encryption - Transport Layer Security (TLS) technology - to further protect the data you have provided. This internet standard encryption makes the data unreadable as it passes from your device to our server. We also use digital certificates to ensure that you are connected via authentic channels.

In addition, we are regularly audited by an independent external entity to ensure that we comply with internationally recognised standards and best practices in accordance with ISO/IEC 27001.. Finally, as part of our security policy, we are committed to maintaining this external certification in order to demonstrate the secure processing of your personal data.

6. UPDATE OF THE PRIVACY POLICY

This Privacy Policy may be updated periodically to reflect changes in our personal data protection practices. We will post a prominent notice on our website informing you of any material changes to our Privacy Policy and will indicate at the top of the notice when this policy was last modified.

7. CONTACT US

If you have a question or comment about this Privacy Policy or about the processing of personal data by Belgian Mobile ID, please contact our Data Protection Officer via the following contact details :

Email: privacy@itsme-id.com

Mail: Rue du Marquis 1, 1000 Brussels, Belgium

User contact form: https://support.itsme-id.com/hc/en-us

Company contact form: https://itsmeoperations.itsme-id.com/hc/en-us/requests/new