

PXL Vision Privacy Policy PXL Ident

1. The product

PXL Vision provides you with a way to identify yourself for a service that requires ID verification. Your identity is determined by PXL Vision on the basis of the identification document and the data contained therein, which is recorded by camera and/or, if necessary, collected via the NFC chip contained on the identification document and by comparing the photo contained on the identification document with a selfie taken by you. Video checked. After transmission by PXL Vision, the verified result can be sent to the service provider for further use of its offer. The identification may be required for a legally regulated (e.g. bank or telecommunications company) or unregulated use case at the provider requesting the identification (transaction partner). The identification can also be done for a qualified trust service provider (QTSP), for example if you want to order them to issue a qualified electronic signature via their certified infrastructure.

2. General information on data protection

At this point we would like to inform you about the processing of personal data as part of the implementation of the identification process. In this context, personal data is all information that relates to an identified or identifiable natural person (hereinafter referred to as the data subject).

The responsible processing body and addressee for the exercise of the rights of those affected is the

PXL Vision AG
Rautistrasse 33
8047 Zurich

3. Applicable Law

This data protection information covers data processing in accordance with the regulations of the currently applicable version of the EU General Data Protection Regulation (GDPR) and the currently valid Swiss Data Protection Act (DSG), which came into force on September 10, 2023, together with the associated Data Protection Regulation (DSV), away.

The DSG applies to data protection issues that have an impact in Switzerland, even if they are initiated abroad. The GDPR essentially applies to the processing of personal data of data subjects located in the Union by a controller not established in the Union.

Unless otherwise regulated, data processing at PXL Vision is carried out in accordance with the principles of the GDPR. Accordingly, processing in accordance with Article 6 of the GDPR is carried out on the basis of appropriate permission standards, which also ensures permissible data processing in accordance with the principles stated in Article 6 of the GDPR.

4. Data and data categories as well as processing purposes

a. Data and data categories

(1) Personal data / master data

The verification of identification documents requires the collection and processing of the following personal data contained on the identification document to be checked. These are usually:

- Last name, first name, address, date of birth, place of birth, maiden name, as well as any other personal data contained on the document
- ID number, issuing authority, date of issue, date of validity

- Biometric photo

Furthermore, a selfie video is recorded to compare the ID photo and the person using it.

(2) Technically generated data

When you access the web app, the following additional data can be collected:

The requested URL and the URL of the website from which the file was requested, the access status (file transferred, file not found, etc.), date and time of retrieval, amount of data transferred as part of the connection, type and version of the data used Browser, language used and IP address.

b. Purposes and their legal basis for which the personal data is processed

(1) Provision of the contractually agreed service

In the following cases, the data processing serves to carry out the contractual service to transaction partners and users in accordance with Article 6 Paragraph 1 Letter b) / Article 6 Paragraph 2 DSG

i. Identity verification

Collection and processing of identification data for the purpose of checking the identification document for authenticity and affiliation with the person using it. The requirements for identification and the associated data processing and transmission arise from the relevant legal requirements for the application, in the context of the provision of trust services, among others from the Swiss Federal Law and the Ordinance on Electronic Signatures (ZertES, VZertES) as well as when using Trust services in and for the EU of the eIDAS regulation and the corresponding technical guidelines.

ii. Providing services that require identification

The collection, processing and transmission of the ID data and the photos and the selfie video are carried out for the purpose of automated comparison and to provide this data to the transaction partner. In the case of a request for a trust service, for transmission to the QTSP as the transaction partner to provide the trust services.

(2) Legitimate interest

In the following cases, we collect and process the data mentioned within the scope of a legitimate interest in accordance with Article 6 Paragraph 1 Letter f) GDPR / within the framework of good faith in accordance with Article 6 Paragraph 2 GDPR:

i. Improving the WebApp user experience

Use of usage data to improve the user experience of the web application and to prevent and prosecute misuse and fraud.

ii. Troubleshooting

Usage data to troubleshoot software or process errors. Identification data and photo files for error checking after a verification and transaction has been completed. Data is also saved in the event of an unsuccessful verification in order to be able to process any later errors or complaints.

iii. Anonymization

for statistical purposes.

(3) Consent

In the following cases, we collect and process data within the scope of consent in accordance with Article 6 Paragraph 1 Letter a) or Article 9 Paragraph 2 Letter a) GDPR / Article 6 Paragraph 7 DSG.

i. Carrying out the identification and verification process

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Identification data and biometric data generated from the passport photo and selfie video.

The data is collected, processed and stored to fulfill the identification service in accordance with Art. 6 DSG, Art. 6 Para. 1 b) GDPR.

The processes used by PXL to process this data are subject to strict data protection requirements and are secured by appropriate technical and organizational security precautions.

ii. Processing for the purposes of quality assurance and development

The data previously identified as part of the identification and verification process is generally only processed to provide the identification service in the respective individual case.

However, PXL Vision also needs the data for its own purposes of improving the quality of the detection algorithms.

The verification process is based on complex analysis algorithms that require constant improvement in order to enable reliable analysis results. PXL processes the data using artificial intelligence and machine learning methods. For this purpose, they are stored at PXL and processed under its own responsibility as the responsible processing body.

The data collected will be stored on separate servers located exclusively in Switzerland based on your consent and, if necessary, within the scope of a legitimate interest in accordance with Art. 6 DSG, Art. 6 Para. 1 a) and f) GDPR. You can object to processing for these purposes at any time by email or post.

5. Recipients or categories of recipients of the personal data

a. Transmission to transaction partners

Either in advance or after the verification has been successfully carried out, the WebApp will inform you or ask for your consent as to whether the result of the verification and the transmission of the collected data may be transmitted to the transaction partner for the purpose of further processing. From this point on, the transaction partner is solely responsible to you for further processing. Please inform yourself in advance about their business and data protection regulations, which will also be displayed to you as part of the overall process.

b. Subcontractors

With the exception of the transaction partner specified in the identification process, the data will not be passed on to third parties or made available to third parties. Subcontractors used by PXL Vision are contractually obliged in accordance with the legal regulations for order processing to comply with strict security requirements in accordance with the provisions of data protection laws.

6. Storage period and criteria for the storage period

a. Storage as part of the identification process

After completing a transaction via the WebApp, the data may be stored in PXL's operational system for a reasonable period of time for support and troubleshooting purposes.

b. Storage for machine learning

Basically, the efficient use of machine learning processes requires algorithms that have as complete a database as possible. The data will therefore be stored until revoked.

7. Places of data processing

We generally only process your personal data in Switzerland, Germany and the European Union. If personal data is processed

outside this region in individual cases, PXL has made appropriate agreements with these companies (order processing agreements) to comply with data protection obligations in accordance with the standards of the DSG and the GDPR.

8. Automated decision making

As part of identity verification, automated procedures are used to check your identity. The result of the identification may potentially lead to automated decision-making by PXL or the transaction partner. After identity verification, the transaction partner is informed of the result in order to be able to make a decision on this basis. In some cases, particularly when a QTSP provides identification for a trust service, human intervention in the verification process may be possible. In the case of automated decisions, you have the right to human intervention by the data controller in accordance with Article 22 (3) GDPR in order to express your point of view and contest the decision. Profiling does not take place.

9. Secure communication

To transmit confidential information, we recommend contacting us by telephone, post or using an encrypted contact form. If you contact us via email, social media, messenger services (such as WhatsApp) or other means, complete data security cannot be guaranteed.

10. Your Rights

In accordance with the DSG and the GDPR, data subjects generally have the following rights:

a. Right to deletion of personal data concerning you

With regard to the personal data to which you have consented to be used for the purpose of quality improvement and development, you have a right of revocation and deletion at any time, which you can exercise by sending an email to privacy@pxl-vision.com. This does not affect the legality of the processing carried out based on consent until its revocation.

If you notice an error in the data collected during the verification process via the WebApp, you should cancel the verification process and inform us via the email address support@pxl-vision.com.

After transmission to the transaction partner, please contact the responsible processing agency directly to correct the data transmitted to them.

b. Right to information from the data subject about the personal data concerned

You can request information about the processing of your personal data in accordance with Art. 15 GDPR / Art. 25 DSG from PXL at any time using the contact details provided above. Please understand that in this case we will take appropriate measures to ensure that you are the correct person authorized to receive information.

c. Other rights

You have the right to have incorrect personal data corrected or incomplete data completed (Art. 32 DSG and Art. 16 GDPR).

Under certain legal conditions, you have the right to restrict processing (Art. 32 DSG, Art. 18 DSGVO).

Under certain legal conditions, you have a right to receive or transfer personal data concerning you (Art. 28 DSG, Art. 20 DSGVO).

d. Your right to object

You have the right at any time to object to the processing of your personal data for quality assurance purposes as described above

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under a. stated to object. An objection to the data stored for the purpose of identification is only possible in justified individual cases, provided that the data processing is not necessary to fulfill the contractual service to the transaction partner or due to legitimate interest, in particular to prevent fraud.

e. Right to lodge a complaint with a supervisory authority

You have the right to complain to a supervisory authority about the processing of your data.

11. Changes to data protection regulations

Since changes to the law or changes to our internal company processes may make it necessary to adapt these data protection regulations, we reserve the right to make changes.

PXL Vision AG, as of October 2024