

Privacy Policy of PXL Vision AG

1. The Product

PXL Vision provides you with the PXL Ident WebApp, a way to digitally identify yourself for the service provider independent of PXL Vision, who will ask you to identify yourself. Your identity is verified by PXL Vision based on the security features of the ID document and the data contained on it, as well as in the context of a comparison of the photo contained on the ID document with a selfie video taken by the user. The verified result can be used by the service provider for the purposes specified by the service provider after it has been transmitted by PXL Vision.

2. General information on data protection

At this point, we inform you about the processing of personal data in the context of the implementation of the identification process. Personal data is any information relating to an identified or identifiable natural person (hereinafter "data subject").

The responsible processing body as well as the addressee for the exercise of the data subject rights is:

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) as well as the currently applicable Swiss Data Protection Act (DPA), which came into force on 10.9.2023, together with the associated Data Protection Ordinance (DPA).

The DPA applies to data protection matters 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.

The data processing at PXL Vision is generally carried out according to the principles of the GDPR, unless otherwise regulated. Accordingly, the processing according to Art. 6 GDPR takes place on the basis of corresponding permission norms, which also ensures a permissible data processing according to the principles named in Art. 6 DSG.

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 verified. These are usually:

- Name, first name, address, date of birth, place of birth, maiden name, name of artist or order, height, eye color
- ID card 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

The following data may also be collected when the web app is called up:
The requested URL as well as the URL of the website from which the file was requested, the status of the access (file transferred, file not found, etc.), date and time of the call, amount of data transferred during the connection, type and version of the browser used, language used and IP address.

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

(1) Provision of the contractually agreed service

In the following cases, data processing serves to provide the contractually agreed service to customers and users in accordance with Art. 6 para. 1 lit. b) / Art. 6 para. 2 DSG

(i) Matching with the data record available at the transaction partner's site

Collection, processing, and transmission of identification data. Upon successful verification, a transmission to the transaction partner takes place via a secure connection.

(ii) Carrying out the matching of the ID photo and the person taken during use

Collection, processing and transmission of the photos and the selfie video for automated matching and provision of this data to the transaction partner for matching with his own data to be confirmed by him.

The data is provided to the transaction partner via a secure connection. This also takes place in the event that a verification has not proved successful.

(2) Legitimate interest

In the following cases, we collect and process the designated data within the framework of a legitimate interest according to Art. 6 (1) lit f) DSGVO / within the framework of good faith according to Art. 6 (2) DSG:

(i) Improve the user experience of the WebApp

Use of usage data to improve the user experience of the Web App and to prevent or track abuse and fraud.

(ii) Troubleshooting

Usage data for the purpose of troubleshooting software or processes. Identification data and photo files for the purpose of error checking after a completed verification and transaction. Data is also stored in the event of an unsuccessful verification to be able to follow up on subsequent errors or complaints if necessary.

(iii) Anonymization

for statistical purposes

(3) Consent

In the following cases, we collect and process data within the scope of consent pursuant to Article 6 para. 1 lit. a) or Article 9 para. 2 lit. a) DSGVO / Art. 6 para. 7 DSG

(i) Implementation of the identification and verification process

Identification data and biometric data generated from ID photo and selfie video.

The data is collected, processed, and stored to fulfill the identification service according to Art. 6 DSG, Art. 6 para. 1 b) DSGVO.

The processes used by PXL Vision to process this data are subject to strict data protection regulations and are secured by correspondingly secure technical and organizational measures. The servers of PXL Vision are located exclusively in Switzerland, a data transfer to third parties or to other countries does not take place

(with the exception of the transfer to the transaction partners specifically named in each case during identification).

(ii) Processing for quality assurance and development purposes

The data designated above as part of the identification and verification process is processed in principle only for the purpose of providing the identification service in the respective individual case.

The verification process is based on complex analysis algorithms that require continuous improvement to enable a reliable analysis result, so PXL Vision stores this data for quality assurance and development purposes using artificial intelligence and machine learning techniques and obtains consent to do so.

The collected data is stored on separate servers located exclusively in Switzerland based on your consent and, if applicable, in the context of a legitimate interest pursuant to Art. 6 DSG, Art. 6 para. 1 a) and f) DSGVO. You can object to processing for these purposes at any time by e-mail or by post.

5. Recipients or categories of recipients of the personal data

a. No transmission to third parties

Die Daten werden nicht an Dritte weitergegeben oder Dritten zugänglich gemacht. Ggf. eingesetzte Unterauftragnehmende von PXL Vision sind vertraglich verpflichtet gemäss der gesetzlichen Regelungen zur Auftragsbearbeitung verpflichtet, strenge Sicherheitsanforderungen gemäss den Bestimmungen der Datenschutzgesetze einzuhalten.

b. Transmission to transaction partners

After each successfully completed verification, you will be expressly asked by the WebApp for your consent as to whether the result of the verification as well as the transmission of the collected data for comparison and, if necessary, further storage and processing by your service provider/our transaction partner may be transmitted to this transaction partner already known to you and again expressly and specifically named as part of the verification process. After consent has been given, PXL Vision transmits this data to the named transaction partner via a secure connection. From this point on, the transaction partner is exclusively responsible to you for further processing. Please inform yourself about their data protection regulations before giving your consent.

6. Storage period and criteria for the storage period

a. Storage as part of the identification process

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

b. Storage for Machine Learning

The data for the purpose of quality assurance and development will be stored until further notice because the database is the basis for the machine learning processes. Deletion will take place if you request deletion of your data or object to its use.

7. Data processing locations

As a matter of principle, we only process your personal data in Switzerland, Germany, and the European Union. If, in individual cases, personal data is processed outside this region, PXL Vision has entered into corresponding agreements with these companies to comply with the data protection obligations in accordance with the standards of the DPA and the GDPR (order processing agreements).

8. Automated decision making

If the identification and biometric data are successfully matched, an automatic decision is made about the user's identity with the documents he or she has scanned. This decision is not based on personal characteristics of the user, such as age, gender, interests, knowledge, etc., but solely on the algorithmic matching of the image files and the matching of the identification data. Profiling does not take place.

9. Secure communication

For the transmission of confidential information, we recommend that you contact us by phone, mail, or encrypted contact form. If you contact us by e-mail, social media, messenger services (such as WhatsApp) or other means, complete data security cannot be guaranteed.

10. Your rights

Within the meaning of the DPA and the GDPR, data subjects are generally entitled to the following rights:

a. Right to erasure of personal data concerning you.

Regarding the personal data, the use of which you have consented to for the purposes of quality improvement and development, you have a right of objection and deletion at any time, which you can exercise by sending an email to privacy@pxl-vision.com. This does not affect the lawfulness of the processing carried out based on the consent until revocation.

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

After the transmission to the transaction partner after your consent, please contact them directly regarding the correction of the data transmitted to them.

b. Right of access on the part of the data subject to the personal data concerned.

You can request information about the processing of your personal data at any time pursuant to Art. 15 DSGVO / Art. 25 DSG at PXL Vision via the contact details provided above. We ask for your understanding that in this case we will ensure appropriate measures to ensure your identity as the correct recipient of the data information.

c. Other rights

- You have the right to have incorrect personal data corrected or incomplete data completed (Art. 32 DSG and Art. 16 DSGVO).
- You have a right to restrict processing under certain legal conditions (Art. 32 DSG, Art. 18 DSGVO).
- You have a right to receive or transfer the personal data concerning you under certain legal conditions (Art. 28 DSG, Art. 20 DSGVO).

d. Your right of objection

You have the right to object at any time to the processing of your personal data, which is based on Art. 6 (7) DSG, Art. 6 (1) a) DSGVO, in particular for processing for quality assurance and development purposes. We will then no longer process your personal data for these purposes. You can submit such an objection to us using the contact details provided. 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 for the fulfillment of the contractual performance towards the transaction partner or due to legitimate interest, especially for fraud prevention.

e. Right of complaint to a supervisory authority

You have the right to lodge a complaint about the processing of the data with a supervisory authority.

11. Changes to the privacy policy

Since changes in the law or changes in our internal company processes may make it necessary to adapt this privacy policy, we reserve the right to change this policy.

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