

Data protection information on the use of data for quality assurance and development purposes by PXL Vision AG

1. Processing of data by PXL Vision

PXL Vision is a provider of digital identification services and makes them available to transaction partners, i.e. customers who require identification services from their users. In addition to the identification performed on behalf of the customer, it is important for PXL Vision to be able to process the data collected during the identification for purposes of securing and improving/developing the quality of the identification processes. For this purpose, PXL Vision stores the data collected from the customer (i.e., in particular, the image data and text content of the scanned identification documents, as well as the selfie video that may have been recorded) in order to incorporate them into machine learning processes using artificial intelligence. In this way, PXL Vision is able to continuously improve the accuracy of document and facial recognition based on a larger database.

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 takes place in principle, unless otherwise regulated, according to the principles of the GDPR. 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: Personal data / master data

As part of the verification of identification documents on behalf of the transaction partners, the following personal data contained on the identification document to be verified is collected and processed. 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.

b. Purpose and its legal basis for which the personal data are processed by PXL Vision

The data previously designated within the scope of the identification and verification process shall in principle only be processed for the purpose of providing the identification service in the respective individual case in the order.

The verification process is based on complex analysis algorithms that require continuous improvement to enable a reliable analysis result, so that PXL, as a technical service provider of identity verification, also requires this data itself for quality assurance and development purposes using artificial intelligence and machine learning methods, stores it for this purpose and processes it for this purpose under its own responsibility as the responsible processing entity.

The collected data is stored on separate servers located exclusively in Switzerland on the basis of your consent and, if applicable, within the scope of a legitimate interest pursuant to Art. 6 DSG, Art. 6 para. 1 a) and f) GDPR. 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

The data will not be passed on to third parties or made accessible to third parties. PXL Vision's subcontractors, if any, are contractually obligated in accordance with the legal regulations for order processing to comply with strict security requirements in accordance

with the provisions of the data protection laws.

6. Duration of the storage of personal data

In principle, the efficient use of machine learning processes requires algorithms that have as complete a database as possible. The data is therefore stored until it is revoked.

7. Place of data processing / transfer of personal data to a third country

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. 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

With regard to the personal data whose use 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 E-mail to privacy@pxl-vision.com. This does not affect the lawfulness of the processing carried out on the basis of the consent until revocation.

If you notice an error in the collected data during the verification process via the App or 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 GDPR / 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 GDPR).
- You have a right to restrict processing under certain legal conditions (Art. 32 DSG, Art. 18 GDPR).
- You have a right to receive or transfer the personal data concerning you under certain legal conditions (Art. 28 DSG, Art. 20 GDPR).

d. Your right of objection

You have the right to object at any time to the processing of your personal data that is carried out on the basis of Art. 6 (7) DSG, Art. 6 (1) a) GDPR 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.

e. Right of complaint to a supervisory authority

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

9. Changes to the privacy policy

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

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