
PRIVACY NOTICE

KINEGRAM® eMRTD Connector App, DocVal Server

OVD Kinegram AG (hereinafter “**OVDK**”) respects any concerns associated with privacy issues and therefore would like the user of its apps (hereinafter “**the Users**”) to be familiar with the method for the collection, processing and use of any information including information concerning the personal or material circumstances of an identified or identifiable individual (hereinafter “**Personal Data**”). This Privacy Notice describes the type of information or Personal Data that is collected when using the KINEGRAM® Digital Seal application (hereinafter “**App**”) and how such information or Personal Data is collected, processed and used by OVDK.

1. Who We Are

OVD Kinegram AG
Zaehlerweg 11
CH-6300 Zug, Switzerland
Phone +41 41 555 20 00
digitalsolutions@kinegram.com

2. Data We Collect

- Operating system and version
- Mobile device type
- Generated device ID
- Browser version (when scanning with laptop or PC)
- Time and date of scan
- IP address
- GPS coordinates
- Document-specific attributes (e.g. issuing country)

We will only collect data from a User when a scan or read function is executed within the App or a document from the document library is displayed.

2.1 GPS coordinates

We collect the GPS coordinates where the User’s device is located, when the device is used to execute a scan or read function. After downloading the App, the App will request to allow location access. If technically supported by the User’s mobile device, the User may disallow location access in the settings of the mobile device at any time.

2.2 IP Address

The “IP Address” is a number that is automatically assigned to the User’s networked device by the Internet Service Provider. We will collect the User’s IP address, when the User executes a scan or read function within the App. However, we will use appropriate means to anonymize the User’s IP address by shortening such IP address in the App and we will therefore not collect nor save the User’s full IP address in order to prevent IP addresses from being traced to a specific User.

2.3 Other Non-Personal Data

The operating system version, the mobile device type, the generated device ID, the document-specific attributes and the browser version (when scanning with laptop or PC) are automatically collected when using a scan or read function within the App or when a document from the document library is displayed. However such information is not assigned to and cannot be linked to a specific person. Instead this information is used to determine the attractiveness of the App and to improve its performance or content. The following information is not collected: The mobile device user name, the International Mobile Equipment Identity number or any other mobile device identification (e.g. UDID), the serial number or the model number of the User’s mobile device. The generated device ID is automatically registered but cannot be linked to a specific mobile device or person.

3. **Personal Data**

We may collect Personal Data if and to the extent that such Personal Data was provided by the User (e.g. in case of an inquiry or request by the User). In this case the Personal Data we collect will only be used for the purpose of providing the User with the requested services.

In the event of the use of Personal Data for a purpose which requires the User's consent under the statutory provisions, we will always request from the User an explicit consent and record such consent in accordance with the data protection regulations.

The User has right to withdraw such consent at any time using a message to the contact information set out in Section 1. The withdrawal of consent shall not affect the lawfulness of the collection, the processing and the use of Personal Data based on prior consent.

Based on the User's express request we will provide the User with the information to what extent Personal Data of the User is stored by us free of charge.

4. **How We Use Data (Purpose of Use)**

We will use the User's data solely for the following purposes:

- Calculating App usage levels in different geographic regions
- Improve the verification quality in the future
- Helping diagnose server and performance problems

5. **How We Transfer User's Personal Data**

The collected data remains on servers in Germany and may only be accessed by our affiliated companies LEONHARD KURZ Stiftung & Co. KG and KURZ Digital Solutions GmbH & Co. KG. We will not transfer the User's Personal Data to any third party unless we have obtained such User's consent or are legally obligated to do so (e.g. in case of a court order).

6. **How We Store User's Personal Data**

User's Personal Data will be processed for the first time from the time of collection and deleted after storage is no longer necessary. Otherwise, we restrict processing if there are legal retention obligations. We do not store User's Personal Data by using the App. User's Personal Data will be deleted immediately after legitimation. In the event that the User has agreed to further storage of User's Personal Data, we will delete User's Personal Data after the agreed period has expired.

7. **User's Rights**

Users have the following rights if the legal requirements are met: Users have the right to request information (Art. 15 GDPR and Art. 25 CH-DSG), rectification (Art. 16 GDPR and Art. 32 CH-DSG), deletion (Art. 17 GDPR) or restriction (Art. 18 GDPR) of processing of User's Personal Data to the extent required by law. We will also provide the User with User's Personal Data in a structured, common and machine-readable format upon request (Art. 20 GDPR and Art. 28 CH-DSG). To exercise User's rights, the User should contact the controller. If we process User's Personal Data on the basis of legitimate interest, the User can object to this processing (Art. 21 GDPR and Art. 30 CH-DSG). The User also has the right to contact the competent supervisory authority if the User believes that the processing of User's Personal Data is not rightful (Art. 77 GDPR and Zivilprozessordnung Art. 20 Bst. d).

8. **Updates to this Privacy Notice**

We reserve the right to make changes to this Privacy Notice. In the event of any changes to this Privacy Notice, the User may be prompted to accept such changes to this Privacy Notice when downloading updates to the App. No changes to this Privacy Notice shall be applicable without User's prior consent.

CONTACTING US

If you have any problems or questions about this Privacy Notice, please contact us.

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ISSUE: 08/2021