

# Privacy Notice

**Effective Date:** July, 2025

This Privacy Notice explains how **Ayasec**, a service owned by **NewTech Mobile SIA** (referred to as “we,” “us,” or “our”), collects, uses, shares, and protects your personal data during the identity verification process.

## 1. Who We Are

Ayasec is an identity verification tool operated by **NewTech Mobile SIA**, a company registered in Latvia.

**Company registration number:** 40103709254

**Registered address:** Rīga, Skanstes iela 7 k-1, LV-1013

**Contact email:** dpo@newtech.lv

We are the data controller for the personal data processed through Ayasec.

## 2. What Data We Collect

During the identity verification process, we collect and process the following categories of personal data:

- **Identity Documents:** Photos of your valid, government-issued ID card or passport.
- **Proof of Address:** Image of a utility bill or bank statement not older than 3 months, showing your name and address.
- **Biometric Data:** A selfie and a liveness photo for identity matching.
- **Metadata:** Timestamp, IP address, and device/browser information used during the verification process.
- **Consent Record:** Proof that you consented to the processing of your personal data.

## 3. Why We Process Your Data (Purpose and Legal Basis)

Your personal data is processed for the following purposes:

- **To verify your identity.**
- **To comply with legal obligations** (e.g., anti-money laundering, fraud prevention).

- **To protect our legitimate interests**, such as preventing fraudulent access.
- **To ensure secure access to services requiring verified identity.**

**Legal bases** under GDPR:

- Article 6(1)(a): **Consent**
- Article 6(1)(c): **Legal obligation**
- Article 6(1)(f): **Legitimate interest**

For biometric processing (e.g., face matching), we rely on **your explicit consent** (Article 9(2)(a) GDPR).

## 4. How We Collect Your Data

You provide your data directly via the Ayasec platform by:

- Uploading or photographing your ID and address document
- Taking a selfie
- Accepting this Privacy Notice and giving your consent

## 5. Who We Share Your Data With

We may share your data with:

- **Our service providers**, such as secure cloud storage or biometric matching providers
- **Regulated institutions**, if required by law or compliance obligations
- **Authorities**, upon lawful request

All third parties are bound by strict confidentiality and data protection obligations.

## 6. Data Retention

Your data is retained only as long as necessary to fulfill the purposes for which it was collected, or as required by law. Typically:

- **Identity documents and biometrics**: up to 5 years (or as required by legal obligations)

- **Proof of address:** up to 5 years
- **Consent logs and metadata:** up to 5 years

## 7. Your Rights

You have the following rights under GDPR:

- **Right to access** your data
- **Right to rectification** of inaccurate data
- **Right to erasure** ("right to be forgotten")
- **Right to restriction** of processing
- **Right to data portability**
- **Right to object** to processing based on legitimate interests
- **Right to withdraw consent** at any time (without affecting prior processing)

To exercise these rights, contact us at: dpo@newtech.lv

## 8. Security Measures

We implement appropriate technical and organizational measures to protect your data, including:

- End-to-end encryption
- Secure servers located in the EU
- Access control and monitoring
- Regular audits and data protection impact assessments

## 9. International Transfers

Your data may be processed outside the EU/EEA. In such cases, we ensure safeguards such as:

- Adequacy decisions
- Standard Contractual Clauses (SCCs)

## **10. Changes to This Notice**

We may update this Privacy Notice periodically. We will notify users of material changes through the Ayasec platform or email.

## **11. Contact & Complaints**

If you have any questions or wish to file a complaint, contact:

**Data Protection Officer (DPO)**

Email: dpo@newtech.lv

You also have the right to lodge a complaint with your local **Data Protection Authority** (e.g., **DVI** in Latvia).

**By proceeding with the identity verification process, you confirm that you have read and understood this Privacy Notice and consent to the processing of your personal data as described above.**