Privacy Policy: itsme App & Services

This itsme App & Services Privacy Policy (hereafter the "Privacy Policy") applies to (i) the itsme Application (hereafter the "itsme App" or the "App") developed by Belgian Mobile ID SA/NV as well as (ii) the services provided by Belgian Mobile ID SA/NV to its business or private customers.

The itsme App allows its users (hereafter the "Users") to share data with, access/log-into and confirm transactions through websites and/or different mobile applications (as made available by Service Providers). The itsme App also allows the Users to electronically sign documents, using a qualified certificate on a qualified signature creation device (hereafter all services together -actual and future- the "itsme Services").

The App is made available by Belgian Mobile ID NV/SA, whose seat is registered at Markiesstraat 1, 1000 Brussels, Belgium, under number 0541.659.084 – RPM Brussels (hereafter "Belgian Mobile ID", "we" or "us")[1].

The itsme Services are made available by Belgian Mobile ID with the intervention of the following third parties (hereafter jointly referred to as the "Belgian Mobile ID Members"):

- Service Providers: providers of services or goods or any other third party with whom you use the App to register with them, or log into their website/app, approve a transaction or sign a document.
- Identity Registrars: entities that can verify your identity, such as your bank.

When providing the itsme Services Belgian Mobile ID acts as data 'controller' under the applicable Belgian privacy laws, and as such Belgian Mobile ID is responsible for the collection and use of your personal data. Please note that, in specific cases, we may also process your personal data on behalf of our Service Providers (acting as controller). In such case, we act as processor and will process your personal data strictly on the documented instructions of the data controller on behalf of which we do so. Those processing activities are not described in this Privacy Policy. Please refer to their privacy policies for further information.

The following policy explains among others (i) the different types of personal data that will be collected, (ii) the purposes of collection, (iii) any sharing of that data with third parties, (iv) your rights as the data subject and (v) the measures taken to protect your personal data. Please note that the itsme Services necessarily imply that we will collect and store personal data pertaining to you and that we will communicate some of your personal data to third parties, as described below.

This Privacy Policy only describes the processing of personal data performed by us (or on our behalf) in our capacity as controller in the context of the itsme Services – other entities, such as the Service Providers and Identity Registrars also process your personal data as data controllers in the context of their own services or activities; for those processing activities please refer to their privacy policies.

[1] The Crossroads Database of Undertakings (Banque-Carrefour des Entreprises/Kruispuntbank van Ondernemingen).

0. MODIFICATIONS COMPARED TO THE PREVIOUS VERSION OF THIS PRIVACY POLICY AND ENTRY INTO FORCE OF THE NEW VERSION

This updated privacy policy version 5.0 will become applicable as from March 19th, 2025.

you will find below the list of modifications compared to the previous version of our privacy policy:

- Chapter 1.1, 2.6, 3, 6.1: Adaptation specifically for sharing data from external Data Vault and/or Wallet environments

1. THE PERSONAL DATA WE COLLECT AND HOW

1.1. THE PERSONAL DATA WE PROCESS

In order to offer the itsme Services and operate the App as set out in this Privacy Policy and the General Terms and Conditions, we process different categories of personal data:

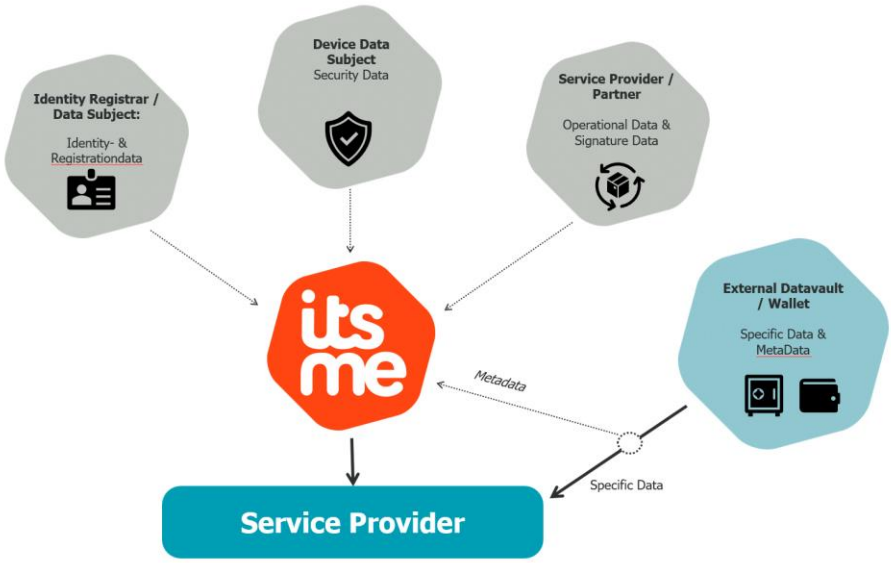
- Identity Data, which allows us to identify you. These cover various kinds of data:
    - core identity data, consisting of the data which allows us to identify you (for instance your full name, gender, legal address, nationality, date and place of birth, ID-Card Number and ID picture (all as recorded on any official document that we accept to verify your identity, such as your ID card, your passport, etc.).
    - The unique identifier linked to your identity in your country of residence (such as, with regard to Belgium, the National register number). Such unique identifier will only be used within the boundaries set by, and in accordance with, the applicable local laws and regulations. Please note that, in some cases, we may process the unique identifier on behalf of Service Providers (Belgian Mobile ID acting as a processor). In such case, we will process your personal data strictly on the documented instructions of the data controllers on behalf of which we process your personal data. Those processing activities are not described in this Privacy Policy. Please refer to their privacy policies for further information.
    - Biometric data (processed to comply with our legal obligations and, in cases where it is necessary, after having obtained explicit consent from the User); in all cases biometric data will not be processed before having informed you clearly of the processing.
    - Contact information (email address and mobile phone number);
    - Different user and preference settings, e.g. your shipping address or the specific capacity in which you act (as employee of a specific company, for instance).
    - IP address and device identifier, which are processed to respond to your support requests, to send you notifications about products and legal issues, to analyse fraud cases and to enable registration and tracking of BMID systems.
- Security Data, which are necessary in order to verify your identity as the User and to link your phone to your account, i.e. details regarding your device (brand, version, rooted or not device, …), your device's operating system (OS and version), and the version of the itsme App on your device When you enrolled for the itsme Services, you consented to the transfer of some of the Security Data to Belgian Mobile ID; the elements of the Security Data are collected directly via your device.
- Operation Data, which are the records of specific operations carried out through the App and their characteristics, covering for example, to which entity information is sent, when it is sent and concerning which transactions.
- Enrolment Data, which are specifics regarding the registration process and cover information such as your consent to our Terms and Conditions and this Privacy Policy and the date and time of enrolment.
- Signature Data, which are all such information, including personal data, as are necessary in accordance with the applicable law in order to provide the services of validating the electronic signature (Signature Validation data) or creating qualified electronic signature (Signature Creation data), under Regulation (EU) No 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC) (the "eIDAS Regulation").

- Sharing data from external Data vaults or Wallet environments: When sharing data from external Data Vaults or Wallet environments, Belgian Mobile ID / itsme explicitly limits itself only to transferring a temporary version of this specific data to deliver the data, as approved by the itsme user, to the partner in question. This temporary version is in no case retained after the transaction, with us only acting as a data controller to facilitate this transfer.

We only process such data as are necessary for the purposes described below and we only process data that is, in relation to said functions or services, adequate, relevant and limited to what is necessary. We could process other data elements on a voluntary basis, but in such case, we would inform you and ask for your consent thereto.

Aside from the information set forth above, we may process other data elements such as Usage and Device Information. Usage and Device Information relates among others to data regarding (i) the App version, the device model, OS and language used, (ii) a country in which the App or Service is used; and (iii) usage data relating to how often the App is used, what happens within the App, aggregated usage and performance data, App errors and debugging information, and where the Apps were downloaded from.

1.2. HOW PERSONAL DATA ARE COLLECTED



The different categories of personal data described are either collected directly from you or by a Belgian Mobile ID Member as follows:

- Identity Data is collected either directly from you or from the Identity Registrar you enrolled with for the App. When you enrolled with them, you consented to the transfer of your Identity Data to Belgian Mobile ID. We may also update your Identity Data after having verified it. In that context, Identity Registrars may from time to time send us updates regarding your Identity Data. Identity Data may also include biometric data if you opt for the biometric enrolment. In that case, the biometric data will be strictly limited to your eID picture.
- Security Data is obtained directly from your phone (details from your device, brand, type, OS).
- Operation Data is a mixture of data generated by the App itself and data received from Service Providers.
- Enrolment Data is created when registering for an itsme account. Enrolment Data is obtained either directly from you, when registering through the itsme website, or through the Identity Registrar.
- Signature Data is a mixture of Identity data (collected directly from you or via our Identity Registrar(s)) and Operation data (received from the Service Provider(s)).
- Usage and Device Information can be collected when you enroll and use the App.
- Note: Data from external Data Vaults or Wallet environments are not maintained by Belgian Mobile ID. These are only and directly transmitted to the Service Providers, and immediately afterwards deleted from the systems of Belgian Mobile ID.

2. WHEN WILL THE DIFFERENT CATEGORIES OF DATA BE PROCESSED?

We generally use your personal data to provide you with the itsme Services, it being understood that this includes:

- carrying out the operations you request to perform with the App and more generally, the operation of the App and performance and itsme Services, for the first time or afterwards, when you unblock your account, for instance (including the creation of a signing certificate when you use the service of signature creation); Please note that the processing of biometrics data can also be done to comply with applicable legal requirements
- the operation, evaluation and improvement of the services offered by Belgian Mobile ID, such as: (i) communicating with you (customer support, reviews of our products and services, information on new products and features, etc.), (ii) monitoring the usage of the itsme App, (iii) analyzing Belgian Mobile ID's products, services and websites, (iv) facilitating the functionality of the App and (v) performing accounting, auditing, billing, reconciliation and collection activities; and
- fraud management and risk management.

2.1. WHEN WILL IDENTITY DATA BE PROCESSED AND HOW:

- Registering for the itsme Services (for the first time or each time you reactivate your account): we will collect and verify your identity data the first time you register for the itsme Services (either via an Identity Registrar or directly from you) after you agreed thereto. For the processing of biometric Identity Data, you will be asked for consent.
- Informing you on the itsme® Services and Belgian Mobile ID.
- Updating your Identity Data: from time to time, we will update your Identity Data in our database. This will be done only after the updated elements of Identity Data have first been verified. In that context, Identity Registrars may, on a periodic basis, communicate updated elements of Identity Data to us.
- Registration with a Service Provider: When you register for the first time with a Service Provider through the App, your consent is requested. This is because in such case we will have to transfer elements of your identity data to them. you will be asked to consent to each data transfer and to any request for additional personal data should it arise.
- Logging-in and Confirming a Transaction: Depending on the technical interface Service Providers choose, Identity Data may have to be communicated to them for log-in and approval operations, including for sharing data from external Data Vaults or Wallet environments.
- Signature creation or validation: when you use the itsme App to electronically sign a document or when we are requested to verify an electronic signature, we process elements of Identity data of the signatory (you, when you use the itsme App to sign a document) to create the signature or verify its validity; in case of signature creation, those elements will be communicated to the Service Provider as part of your signature. When you do not have a valid signing certificate in your name, some of your Identity Data will also be communicated to the certificate authority for the creation of that signing certificate.
- Archiving: Once you have terminated your use of the itsme Services or after a period of inactivity over two years, the data will be archived for evidentiary purposes for a period of 10 years (counting from the last transaction), after which they will be destroyed.

All elements of your identity data that are communicated to Service Providers will be processed by those Service Providers acting as data controllers in accordance with their own privacy policy. Please note that once elements of Identity data are transferred to the Service Providers we cannot control how they will process them nor do we assume any liability therefore. We advise you to read carefully the Service Providers' privacy policy before using our App to perform operations with them.

Please also note that if you intend to use your fingerprint or any other biometric authentication tool (such as FaceID) as a means of authentication in the itsme App other than for registering an itsme account, the fingerprint or any other biometric authentication tool that you register on your device, will not be transferred to Belgian Mobile ID in whatever form and will therefore not be processed by Belgian Mobile ID. Belgian Mobile ID only requests the biometric recognition function on your device to confirm that that the biometric element used by you corresponds to the biometric element that has been logged by the device. The processing of your personal data in the context of the function of biometric recognition is subject to the privacy policy and terms and conditions of the manufacturer of the device.

2.2. WHEN WILL SECURITY DATA BE PROCESSED AND HOW:

- A transaction requires identity verification: we receive the Security Data at the time of enrolment and in specific cases at the moment of a transaction with the App, directly from your phone (data regarding brand and type of device, OS-version). We store that information in our database for validation purposes and such data are stored as long as needed for such purposes. In certain limited cases, elements of the security data will be transferred to a Service Provider for purposes of fraud and risk management by that Service Provider.

- Archiving: Once you have terminated your use of the itsme Services or after a period inactivity over two years, the Security Data will be archived for evidentiary purposes for a period of 10 years (in case of transaction data, counting from the last transaction), after which they will be destroyed.

All elements of your Security Data that are communicated to Service Providers will be processed by those Service Providers acting as data controllers in accordance with their own privacy policy. Please note that once elements of Security Data are transferred to the Service Providers we cannot control how they will process them nor do we assume any liability therefore. We advise you to read carefully the Service Providers' privacy policy before performing transactions with them via our App.

2.3. WHEN WILL OPERATION DATA BE PROCESSED AND HOW:

- Carrying out a transaction: the App generates the Operation Data as you carry out different operations with Service Providers. The data generated will be logged for evidentiary purposes.
- Informing you of your past transactions in your historic in the App
- Archiving: the Operation Data will be archived for evidentiary purposes, for a period of 10 years (to be calculated starting from the relevant operation), after which they will be destroyed.

2.4. WHEN WILL ENROLMENT DATA BE PROCESSED AND HOW:

- At the enrolment: the Enrolment Data will be generated and collected at the time of your enrolment with the itsme Services;
- Evidence and Archiving: Enrolment Data is kept in database by either the Identity Registrar (acting as processor for Belgian Mobile ID) or directly Belgian Mobile ID for evidentiary purposes. Once you have terminated your use of the itsme Services or after a period of inactivity of two years, the data will be archived for a period of 10 years. After this period, the Enrolment Data will be destroyed.

Please note that by contacting our facilities, including the helpdesk services linked to the itsme App, you agree that messages (voice, text or otherwise) and any related technical information (such as the origin of communication, time and duration of the communication, claimed identities of the participants) may be recorded and stored for one month, in order to permit us to evaluate the effectiveness and performance of our contact facilities, and in order to address any attempted unlawful uses of our contact facilities or the itsme Services.

2.5. WHEN WILL SIGNATURE DATA BE PROCESSED AND HOW:

We process Signature Validation Data in order to provide services of qualified electronic signature validation, as prescribed by Articles 3(41), 32 and 33 of the eIDAS Regulation.

We process Signature Creation Data in order to provide services of electronic signature creation in accordance with the same eIDAS Regulation.

In this framework, we act as data controller in accordance with the applicable legal provisions, including in particular the eIDAS Regulation and the implementing regulations and derived technical standards. We provide these services in accordance with the applicable legislation on the processing of personal data, and we ensure in particular that only data that is adequate, relevant and not excessive for that purpose is processed. In the contractual terms on which we agree with the Service Providers and that govern our providing such services, we also ensure that all rules and principles of the data protection laws are fully complied with. In particular, we ensure that adequate and appropriate technical and organisational measures are implemented to safeguard the Signature Data that are processed and prevent unauthorized or unlawful processing of personal data and accidental loss, destruction or damage to the same personal data.

Signature Data will be archived for evidentiary purposes, for a period of 10 years (to be calculated starting from the relevant signature service operation), after which they will be destroyed.

2.6. WHEN AND HOW WILL DATA FROM EXTERNAL DATA VAULTS OR WALLET ENVIRONMENTS BE PROCESSED:

We process data as shared from the external Data Vaults or Wallet environment only to realize the transfer of this data, based on the explicit consent as given via the itsme App.

The data from external Data Vaults or Wallet environments themselves are only very temporarily processed on Belgian Mobile ID's systems for this transfer, and then immediately afterwards permanently and securely deleted. After this operation, only the "Metadata" of this transaction are kept to keep the operation demonstrable, as well as the security data, as already indicated above (see chapter 2.2 and chapter 2.3).

In this context, we act as a data controller in accordance with the applicable legal provisions. We provide these services in accordance with applicable personal data processing legislation, and in particular we ensure that only data that is adequate, relevant and not excessive is processed for this purpose. In the contractual terms that we agree on with the service providers and that apply to the specific data from those external Data Vault or Wallet environments, we also ensure that all rules and principles as applicable to them, including on data protection, are fully complied with. This is particularly the case for:

- Data from the Notarial IZIMI environment: the IZIMI vault data is subject to the specific regulations as laid down by FEDNOT;
- Data from the Flemish Data Vaults: the Athumi / DNB DataNutsBedrijf vault data is subject to the decree establishing the Flemish DataNutsBedrijf, with specific restrictions around the use of the voluntary consent and the copying ban on this data;
- Data from other Data Vaults: where relevant, access to other Data Vaults will be subject to the conditions relevant to that data.

In particular, we ensure that adequate and appropriate technical and organisational measures are implemented to secure the processed data and prevent unauthorised or unlawful processing of personal data and accidental loss, destruction or damage of the same personal data. Explicit herein are:

- Secure deletion of data: Data as made available in a temporary version by Belgian Mobile ID to the relevant partner are explicitly and permanently deleted after the transaction, with an absolute limitation on processing of up to 15 minutes;
- Limited & auditable access on specific systems: the access of Belgian Mobile ID's employees on specific systems deployed for sharing from external Data Vaults or Wallet environments is restricted, with any direct access remaining auditable.

Metadata regarding the data as shared from the external Data Vault or Wallet environment will be archived for evidentiary purposes, for a period of 10 years (to be calculated from the relevant service operation), after which it will be destroyed.

2.7. WHEN WILL USAGE AND DEVICE INFORMATION BE PROCESSED AND HOW:

Usage and Device Information can be processed when using the App. Such information is processed to conduct research and analysis of usage of, or interest in our App and Services. Such Usage and Device Information is collected with the aim of improving our Services and App (for instance, we may decide to change the look and feel or even substantially modify a given feature based on users' behaviour).

In order to carry out analysis on Usage Data and Information gathered by our App, we may use third party service providers such as Google Analytics – Firebase. Such Usage and Device Information are provided to such third party service providers such as Google in order to enable us to carry out data analysis. Any information which is provided to such third party service provider will become subject to such service provider's privacy policy. Any information provided to Google will therefore become subject to Google's privacy policy which is located here: *https://policies.google.com/privacy*. For further information on how Google's Firebase analytics tool uses data, please see the site "How Google uses data when you use our partners' sites or apps", (located at *https://policies.google.com/technologies/partner-sites*).

2.8. OTHER

We may process any category of personal data to evaluate, improve and ensure the services offered by Belgian Mobile ID are working as intended. This includes but is not limited to (i) communicating with you (customer support, reviews of our products and services, information on new products and features, etc.), (ii) monitoring the usage of the itsme App, (iii) analyzing Belgian Mobile ID's products, services and websites, (iv) tuning, enhancing, improving and facilitating the functionality of the App and (v) performing accounting, auditing, billing, reconciliation and collection activities, (vi) fraud management and risk management.

We may also process any category of personal data to comply with applicable legal requirements and industry standards and policies.

3. ON WHAT LEGAL GROUNDS DO WE PROCESS THE PERSONAL DATA?

We only process your personal data on the basis of one of the following legal grounds:

- processing that is necessary for the performance of the contract between you and Belgian Mobile ID (including the preparation, execution and termination of the contract): e.g. carrying out the operations you request to perform with the App and more generally, the operation of the App and performance and itsme Services (including the creation of a signing certificate when you use the service of signature creation);

- processing for which you have given (explicit) consent – it being understood that Belgian Mobile ID will at all times ensure that that consent is compliant with the applicable laws and regulations: e.g. processing biometric data to verify your identity when you register (for the first time or afterwards, when you unblock your account, for instance) for an itsme account. Please note that the processing of biometrics data can also be done to comply with applicable legal requirements; this is also the legal basis used for processing data from external Data Vault and Wallet environments;

- processing that is necessary for the purposes of the legitimate interests pursued by Belgian Mobile ID: e.g. the operation, evaluation and improvement of the services offered by Belgian Mobile ID;

- processing that is necessary for compliance with a legal obligation to which Belgian Mobile ID is subject: e.g. with regard to the prevention of money laundering or to respond to requests from competent authorities in this context.

- Specifically with regard to processing of the Belgian national register number NRN, Belgian Mobile ID bases itself on Article 8 of the law of 8 August 1983 on the regulation of a national register of natural persons.

Please find below a table recapitulating the processings we do, the applicable legal grounds, the type of data involved, and the retention period for this data.

	Non-biometric identity data	Biometric identity Data	Security data	Operation data	Enrolment data	Signature data
Registering for the itsme Services	Contract	Consent				
Informing you on the itsme® Services and Belgian Mobile ID	Legitimate interest					
Updating your Identity Data	Legal obligation					
Registration with a Service Provider	Contract					
Logging-in and Confirming a Transaction	Contract					
Signature creation or validation	Contract					
A transaction requires identity verification	Contract		Legitimate interest			
Carrying out a transaction				Contract		
Informing you of your past transactions	Contract			Contract		
Enrolment	Contract	Consent			Contract	
Qualified electronic signature validation services						Contract
Electronic signature creation services						Contract
Sharing of data from Data Vault or external Wallet	Contract	Consent				
Evaluate, improve, and ensure the services offered by Belgian Mobile ID are working as intended	Legitimate interest		Legitimate interest	Legitimate interest	Legitimate interest	Legitimate interest

4. THE PERSONAL DATA WE SHARE

We do not sell or otherwise disclose personal data we collect about you to third parties, except as described in this Privacy Policy (here above and below). We will share personal data to enable the performance of itsme Services that you have chosen to use. In this respect, we may share your personal data with our members, including Service Providers, as described above.

We transfer data to third parties who process data in the context of performing or offering itsme Services on our behalf (subcontractors or value added resellers, which have integrated our services into their own platforms or applications and offer them to their customers or merchants with which we do not have a contractual relationship). Those actors act either as processors for us, or for the customers or merchants to which they offer their services. When acting as our processors, they are not authorized to use the data or disclose it in any way except as here above described or to comply with legal requirements. We contractually require these third parties and our Members to appropriately safeguard the privacy and security of personal data they process on our behalf.

We also may disclose data about you: (i) if we are required to do so by law or legal process, (ii) to law enforcement authorities or other government officials in accordance with their competences, or (iii) when we believe disclosure is necessary or appropriate to prevent physical harm, or (iv) in connection with an investigation of suspected or actual fraudulent or illegal activity. Moreover, we can share Usage and Device Information with third party service providers for analysis purposes as set forth in point 3.6 above.

We also reserve the right to transfer any personal data we have about you in the event we sell or transfer all or a portion of our business or assets affecting the itsme App. Should such a sale or transfer occur, we will ensure that personal information you have provided to us remains to be treated in a manner that is consistent with this Privacy Policy.

5. YOUR RIGHTS AND CHOICES

If you wish to exercise your rights or if you have a complaint, question or problem concerning the way we process your personal data, contact our Data Protection Officer via the following contact details

Belgian Mobile ID NV/SA
Markiesstraat 1
1000 Brussels
Belgium
Web: *https://support.itsme-id.com/*
Email: *privacy@itsme-id.com*

If you contact us in order to exercise your rights, we will reply within 1 month. Exceptionally, this period may be extended (up to a maximum of 3 months), but in this case we will inform you of the reason within 1 month.

Whether or not you can exercise your rights depends on the processing operation and its legal basis. If the processing in question or its legal basis does not allow you to exercise a right, we will inform you within 1 month.

Always make sure you clearly state which right you wish to exercise and how you wish to receive the information (e.g. by e-mail, by post, verbally, etc.). Please note that in some cases you will need to provide us with additional information so that we can identify you with certainty and ensure that we are helping the right person.

5.1. ACCESS, RECTIFICATION AND DATA PORTABILITY

At any time, you may exercise your right to access and rectify any of your personal data that we may retain in relation to the itsme App, in accordance with applicable data privacy laws, either, as the case may be, through the App interface itself, or by sending a request with a copy of the front of your ID card, passport or other proof of identity to *privacy@itsme-id.com*, or in writing to Belgian Mobile ID NV/SA, Data Protection Officer (DPO), Markiesstraat 1, 1000 Brussels, Belgium.

Please note that some elements of your personal data can be accessed through the App's interface. As a User you have the right to rectify and modify those data at any time. However, because the itsme Services' security depends on the integrity of the core Identity Data, the modification of these Identity Data will only be possible after the modified elements have been verified: either through an Identity Registrar or via the itsme website (both of which require additional steps to verify your identity).

Finally, you also have the right to data portability in accordance with applicable data privacy laws. To that end, you can send a written request with a copy of the front of your ID card, passport or other proof of identity. Such request can either be sent by email to *privacy@itsme-id.com* or by regular letter to Belgian Mobile ID NV/SA, Data Protection Officer (DPO), Markiesstraat 1, 1000 Brussels, Belgium. In such case, Belgian Mobile ID will provide you or the recipient designated by you in your written request, a copy of such personal data in a CSV or similar format.

5.2. ERASURE

you may at any time exercise your right to data deletion in accordance with applicable data privacy laws, by sending a request with a copy of the front of your ID card, passport or other proof of identity to *privacy@itsme-id.com*, or in writing to Belgian Mobile ID NV/SA, Data Protection Officer (DPO), Markiesstraat 1, 1000 Brussels, Belgium. Belgian Mobile ID will refrain from using any of your personal data upon this request and will only continue to store any past personal data for evidentiary purposes over a period of ten years, after which they will be erased. After your data has been deleted, you will no longer be able to use the itsme Services. As soon as Belgian Mobile ID has received the erasure request, it will inform all Service Providers to whom Belgian Mobile ID has provided any of your identity data. Please note that this notification is for information of the Service Provider only and that the Service Provider will independently decide to continue using the data afterwards or not.

5.3. OBJECTION

When using the itsme App you could be requested to consent to certain data processing activities. You have the right to withdraw your consent to such activities at any time, by sending a request with a copy of the front of your ID card, passport or other proof of identity to *privacy@itsme-id.com,* or in writing to Belgian Mobile ID NV/SA, Data Protection Officer (DPO), Markiesstraat 1, 1000 Brussels, Belgium. Such withdrawal will not affect the lawfulness of past data processing. Please note that opposing to some processing can, however, affect your continued use of the App as Belgian Mobile ID cannot provide the itsme Services without processing necessary elements of your personal data.

At any point, should you deem that your rights have not been respected, you may also log a complaint with the Belgian Data Protection Authority, rue de la Presse, 35, 1000 Brussels, e-mail address: *contact@apd-gba.be* (see also *www.dataprotectionauthority.be*).

6. HOW WE PROTECT PERSONAL DATA

We maintain appropriate administrative, technical and physical safeguards to protect personal data against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of processing of the personal data in our possession.

The security measures we adopt depend on the different types of information collected and stored.

6.1. HOW WE ENSURE THE INTEGRITY OF STORED DATA

- Encryption

We encrypt all the data we store with different keys depending on the origin of the data.

When you provide personal data online, we use the industry standard for encryption on the Internet – Transport Layer Security (TLS) technology – to help protect the data that you provide. This internet encryption standard scrambles data as they are transferred from your device to our server. We also use digital certificates to ensure that you are connected to authentic channels.

- Data Storage

All of your personal data, whether used actively or archived, is stored in Belgian Mobile ID's servers and not the App itself. Belgian Mobile ID uses secured servers provided by a provider internationally certified ISO 27001 that are located in the European Economic Area to store the data.

- Restricted Access

Internal access to the personal data is limited on a strict 'need-to-know' basis. Only authorized personnel, whose activity can be auditably designated to prevent any misuse, will be able to access the personal data.

- Limited retention period

All personal data as processed by Belgian Mobile ID are kept for a limited period of time. These are essentially the following time limits:

  - 10 years for the data commonly processed and maintained by Belgian Mobile ID. Please refer to the archiving period in section 2 for each category of data.
  - 15 minutes (maximum) for data as shared to Partners from external Data Vaults and/or Wallet environments, with the understanding that the data is already deleted immediately after the transaction is completed.

6.2. MEASURES PREVENTING MISUSE

Each operation with the itsme App is subject to strict authentication mechanisms.

7. DATA TRANSFERS

Belgium Mobile ID may (i) enter into agreements with Service Providers and suppliers located outside the European Economic Area whereby those have access to personal data or (ii) transfer personal data to entities located outside the European Economic Area (such as, for instance, the United Kingdom or the United States of America).

The level of data protection in countries outside the European Economic Area may be less than the level of data protection offered within the European Economic Area and transfers outside the European Economic Area. Belgian Mobile ID shall ensure that an adequate level of protection for such personal data is guaranteed by implementing one or more of the safeguards as set forth in Chapter V of the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("General Data Protection Regulation" or "GDPR")).

In case Belgian Mobile ID cannot rely on an adequacy decision taken by the European Commission under Article 45 GDPR for a data transfer outside of the European Economic Area, Belgian Mobile ID will enter into Standard Contractual Clauses (as approved by the European Commission) under Article 46.2 GDPR with the recipient of your personal data. In addition and where necessary, Belgian Mobile ID may take supplementary measures in order to ensure compliance with the level of protection guaranteed within the European Economic Area.

For more info about these safeguards: Please consult our website https://www.itsme-id.com/nl-BE/legal/app-privacy-policy or contact our Data Protection Officer via the contact details in Section 9..

8. UPDATES TO THIS PRIVACY POLICY

This Privacy Policy may be updated periodically to reflect changes in our personal data practices. We will post a prominent notice on our websites and/or through the itsme App to notify you of any significant changes to our Privacy Policy and indicate at the top of the notice when it was most recently updated. We will ensure that you are informed of the changes sufficiently in advance thereof, taking into account the potential impact of the change on you.

9. HOW TO CONTACT US

If you have a question or comment about this Privacy Policy or about the processing of personal data by Belgian Mobile ID, please contact our Data Protection Officer via the following contact details :

Belgian Mobile ID NV/SA
Markiesstraat 1
1000 Brussels
Belgium
Web: *https://support.itsme-id.com/*
Email: *privacy@itsme-id.com*