Recognid.com Privacy Policy

We are happy that you are interested in our services and want you to know that we take the protection of personal data seriously. This Privacy Policy is a description of our commitment to data protection, that states how Recognid.com collects, handles, and processes the data of its customers and visitors.

Please visit this section regularly as the policy may be subject to change or update.

By using recognid.com, you agree to the collection, processing, and transfer of your data as described in this privacy policy.

Who are we?

We, MDFIN CORPORATE LIMITED are the developers of the <u>recognid.com</u> platform.

Information about MDFIN CORPORATE LIMITED

MDFIN CORPORATE LIMITED is a legal entity incorporated in Cyprus, 1 Poseidonos Str., office 5, LEDRA BUSINESS CENTRE, 2406 Egkomi, Nicosia, Cyprus, with the following identification HE397123.

Contacts

info@mdfin.com

Use of recognid.com

By accessing or using any part / function of the <u>recognid.com</u> website, you agree to accept and comply with the terms, conditions and policies mentioned and / or available through the hyperlink and that you are of legal age in accordance with applicable national law. If you do not accept the terms, conditions and policies set forth in this documentation, then you should not continue to access our site and / or use our services.

The content of the <u>recognid.com</u> website: images, texts, web graphics, scripts, software, design rights, model rights, patents, trademarks are the entire property of MDFIN CORPORATE LIMITED and are protected by the Law on Copyright and Rights related to intellectual and industrial property laws. The use without the consent of MDFIN CORPORATE LIMITED of any of the elements listed above is punished, according to the legislation in force.

How we collect data about you

Generally, the personal data we collect is provided by you when completing the contact form available on our website.

How we use the personal data

Please find below the purposes for which we process your personal data, the people who have access to your data, and how we store it.

1. When you interact with us through the contact info available on the site

When you interact with us using the contact details available on the website or you interact with us through our contact form, we will use your contact details and the data you provide to us to reply to you, either if it is for resolving a reported situation or to assess your satisfaction. We will also use all feedback to continuously improve the services we offer.

Personal data	Last name, first name, phone number, email address, the company you work for and any other data you voluntarily send us.
Lawfulness of processing	 We process your data in order to process your request before concluding a contract (Art. 6/1/b of Regulation (EU) 2016/679) In pursuit of our legitimate interest to answer any questions, complaints or recommendations you send us and to improve the services and experience we offer our customers (Art. 6/1/f of Regulation (EU) 2016/679) To detect, prevent or otherwise address fraud, security breaches or technical problems or to protect us against infringement of property rights or against infringement of the security of our website and implicitly of user data (Art. 6/1/f of Regulation (EU) 2016/679)
Who can we share your data with?	 IT service providers for our company (hosting and data storage) or providers to whom we outsource certain technical support services for our site or suppliers of customer relationship management systems Regulatory and other state authorities, if required by legal or statutory requirements. We will only disclose your personal data to the extent that this is strictly necessary to achieve the intended purpose. We have taken all necessary measures to ensure that external service providers who have access to your data have implemented physical, electronic and managerial security measures to protect your data.
How long will we store the data	We will not keep in our database communications older than 1 year from the date of the last interaction. If we conclude a contract, we will not keep personal data for more than 5 years, calculated from the moment of termination of the contract, except for documents that are subject to storage conditions imposed by national law (eg accounting data).

Where data is stored	The data registered through the recognid.com website will be stored on	
	the hosting provider's servers, located in Frankfurt, EU.	
	The data we download locally will be stored securely, both locally and on	
	cloud servers, provided by Amazon.	

Is the data processed by recognid.com safe?

We have implemented physical, electronic, and managerial security measures to protect and secure the information we collect and process. We have limited the access to your personal data to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal data upon our instructions, and they are subject to a duty of confidentiality.

Remember, however, that no data processing is guaranteed 100% secure!

If you suspect a breach of the confidentiality of your data, please contact us immediately at info@mdfin.com.

Important: After the data retention period ends, your data will be deleted. We will continue to use this data only after the irreversible anonymization of this data, if we believe that this data could help us improve the quality of our products or services.

International transfers of personal data

Some of our external third parties are based outside the European Economic Area ("EEA") so the processing of your personal data may involve a transfer of data outside the EEA. We will ensure that all transfers occur in accordance with applicable data protection laws, including concluding data transfer contracts if necessary.

Any transfers of personal data to countries which do not benefit from an adequacy decision issued by the EU European Commission, shall be made based on agreements using standard contractual terms adopted by the European Commission or other appropriate guarantees, under applicable law.

To see the list of countries for which there is an adequacy decision, please check the following link: <u>Adequacy protection - non EU countries</u>.

Processing personal data of minors

<u>recognid.com</u> is not intended and does not collect through the site, knowingly, information from children under 18. If we discover that a minor has used our site we will delete all personal data about them.

Your rights

As a data subject, you have specific legal rights with respect to your personal data that we collect and process. <u>recognid.com</u> respects your rights and will ensure that your interests are properly taken into account.

- Withdrawal of consent: If the processing is carried out based on your consent, you can withdraw your consent for such processing at any time.
- **Rectification of data:** If you notice that we have erroneous personal data, you can ask us at any time to rectify the personal data concerning you. We make reasonable efforts to keep personal data which are used continuously and in our possession or control accurate, complete, current, and relevant, based on the latest available information to us.
- **Restriction of processing:** If you are in one of the following situations, you can ask us to restrict the processing of your data:
 - You contest the correctness of personal data for the period in which we must verify the accuracy;
 - The processing is illegal and you request the restriction of processing rather than personal data deletion;
 - We no longer need your personal data, but you request it for the establishment, exercise or defense of a right; or
 - You object to the processing while we verify that our legitimate reasons take precedence over your rights
- Access to your data: You can ask us for information about the personal data we hold about you, including information about what categories of data, what they are used for, where we collected them, if they are not collected directly from you and to whom they were disclosed (if any). You can obtain a copy from us, free of charge, containing the personal data we hold regarding you. We reserve the right to charge a reasonable fee for abusive requests.
- **Right to portability:** Upon request, we will transfer personal data to another operator, where technically possible, provided that processing is necessary for the performance of a contract. Rather than receiving a copy of your personal data, you may request that we transfer your data directly to another operator specified by you.
- **Right of deletion:** You may obtain the deletion of personal data from us if:
 - the data are no longer needed concerning the purposes for which they were processed;
 - you object to the further processing of personal data (see Right of Opposition below);
 - o personal data have been processed illegally;
 - o you withdraw your consent based on which the processing takes place

Unless the processing is necessary:

- o to fulfill a legal obligation that requires the processing of those data by us;
- in particular for the legal requirements regarding the deadlines for data retention;

- for the establishment, exercise, or defense of a right in court.
- **Right of opposition:** You can object at any time to the processing of personal data due to the special situation you are in. In this case, we will no longer process personal data if we cannot demonstrate well-founded, legitimate reasons, a major interest in the processing or the establishment, exercise, or defense of a right. When you object to the processing, please indicate whether you wish to delete personal data or restrict the processing of such data.
- **Right to file a complaint:** In case of an alleged violation of the data protection legislation, you can file a complaint to the national supervisory authority for data protection at commissioner@dataprotection.gov.cy

Important!

Time period: We will try to resolve your request within 30 days. However, the period may be extended for reasons regarding the specific legal law or the request's complexity.

Restricting access: In certain situations, we may not be able to grant you access to all or part of your personal data due to restrictions provided by law. If we refuse your request for access, we will notify you of the reason for the refusal.

Impossibility of identification: In some cases, we may not be able to identify personal data due to the lack of identification elements provided in the application you send us. In such cases, if you do not provide additional information to identify you, we will not be able to comply with your request to exercise your legal rights, as described in this section.

Exercising your legal rights:

To exercise your legal rights, please contact us, in writing, at <u>info@mdfin.com</u>.

Last updated on the 5th of May 2022