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## 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](https://www.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](https://www.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 (the “Company”), are the developers of the [recognid.com](https://www.recognid.com) platform.

#### Information about the Company:

Name: MDFIN CORPORATE LIMITED

Address: Prodromou 75, ONEWORLD PARKVIEW HOUSE, 3rd floor, Office 305, 2063, Nicosia, Cyprus

Registration no.: HE397123

Contacts: [info@mdfin.com](mailto:info@mdfin.com)

### Use of [recognid.com](https://www.recognid.com)

By accessing or using any part / function of the [recognid.com](https://www.recognid.com) website, you agree to accept and comply with the terms, conditions and policies mentioned and / or available through the hyperlink and confirm 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 [recognid.com](https://www.recognid.com) website: images, texts, web graphics, scripts, software, design rights, model rights, patents, trademarks are the entire property of the Company and are protected by the Law on Copyright and Rights related to intellectual and industrial property laws. The use without the consent of the Company 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.

We also collect data through cookies.

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## 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.

<b>Personal data</b>	Last name, first name, phone number, email address, the company you work for and any other data you voluntarily send us.
<b>Lawfulness of processing</b>	<ul style="list-style-type: none"><li>▪ We process your data in order to process your request before concluding a contract (Art. 6/1/b of Regulation (EU) 2016/679)</li><li>▪ 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 to our customers (Art. 6/1/f of Regulation (EU) 2016/679)</li><li>▪ 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)</li></ul>
<b>Who can we share your data with?</b>	<ul style="list-style-type: none"><li>▪ 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</li><li>▪ Regulatory and other state authorities, if required by legal or statutory requirements</li></ul> <p><i>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.</i></p>
<b>How long will we</b>	We will not keep in our database communications older than one

<b>store the data</b>	(1) year from the date of the last interaction. If we conclude a contract, we will not keep personal data for more than five (5) years, calculated from the moment of termination of the contract, except for documents that are subject to storage conditions imposed by national law (e.g. accounting data).
<b>Where data is stored</b>	The data registered through the <a href="https://www.recognid.com">recognid.com</a> website will be stored on the hosting provider's servers, located in Frankfurt, Germany. The data we download locally will be stored securely, both locally and on cloud servers, provided by Amazon.

## 2. Facilitating an easy and pleasant navigation on our site, analytical and advertising purposes

When you visit our site, we collect data about you through online identifiers (cookies and IP), which are stored in log files.

We use this information to be able to design our site so that we can better adapt to the needs of our users. We may also use your IP address to help diagnose any malfunctions of our servers and to manage our site, analyze trends, and track visitor movements.

<b>Personal data</b>	Internet Protocol (IP), computer general location, website viewing history, timestamp, request / action, information about how visitors use a website, such as which pages are the most popular, which method of linking the pages is most effective, and whether users receive error messages from web pages. Although the information about the categories that define the range of interested users is not personal data, the profile created about visitors based on the data collected through advertising profiling cookies falls into the category of personal data.
<b>Lawfulness of processing</b>	<ul style="list-style-type: none"> <li>• We use cookies that make your browsing on our site easy and pleasant in our legitimate interest (Art. 6/1/f of Regulation (EU) 2016/679)</li> <li>• We use analytical cookies to measure the way users interact with the website and to optimize our content based on your consent</li> <li>• We use marketing cookies to show you targeted advertising based on your consent</li> <li>• Optional / non-essential analytical and marketing cookies are not used without your consent (Art. 6/1/a of Regulation (EU) 2016/679)</li> </ul>
<b>Who can we share your data with?</b>	<ul style="list-style-type: none"> <li>• IT service providers for our company (hosting and data storage) or providers to whom we outsource certain technical</li> </ul>

	<p>support services for our site or suppliers of customer relationship management systems</p> <ul style="list-style-type: none"> <li>• Regulatory and other state authorities, if required by legal or statutory requirements</li> <li>• The third party that provided cookies, e.g. Google</li> </ul> <p><i>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.</i></p>
<b>How long will we store the data</b>	<p>There are session cookies and persistent cookies. The session cookies are deleted when the browser is closed, but the persistent ones may have a different lifetime, which differs depending on the role of the cookie.</p> <p>More information about the lifetime of the cookies that we use, you can find in cookie table below.</p>
<b>Where data is stored</b>	<p>The data registered through the <a href="https://www.recognid.com">recognid.com</a> website will be stored on the hosting provider's servers, located in Frankfurt, Germany.</p> <p>The data we download locally will be stored securely, both locally and on cloud servers, provided by Amazon.</p> <p>The information generated by the cookie about how you use the website (including your IP address) will be transmitted to and stored by Google Ireland Limited, located at Gordon House, Barrow Street, Dublin 4, Ireland ("Google").</p>

## What is cookie?

A cookie is a simple piece of information that takes the form of a very small text file. Each cookie is a unique combination of letters and / or numbers and may include the name of the site that created it.

Most of the websites place cookies on your device's hard drive (computer, mobile phone, or tablet) when you browse them. They do this through your browser - for example Google Chrome, Internet Explorer, Microsoft Edge, Opera, Safari, or Firefox. A cookie can only be read and retrieved by the website that created it. Websites can never exchange information with each other through cookies.

Some cookies are valid only during your visit. These "session cookies" disappear from your computer or mobile device after you close your browser. Other cookies remain on your computer or mobile device after you close your browser and are still valid for a specified period of time. These "persistent cookies" are activated every time you visit the website that generated them.

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## What's not in cookies?

Cookies (as individual items) do NOT contain:

- Personal information - you cannot be personally identified based on a cookie.
- Program code - unlike a computer virus, a cookie is not composed of code, which means that it is not able to damage your device.

## Why do we use cookies?

We use cookies thanks to their useful ability to enhance your navigation through our website and make it easier. One can say that cookies are some sort of memories that the website holds about you, helping it to recall your previous navigation and your personal choices.

You can surf easier and faster on a website that remembers you in contrast to a website that does not remember your previous access. This is the reason why most of the websites you know and like, use cookies.

## What are the purposes for which we use cookies?

A visit to our website may place the following types of cookies:

- cookies strictly necessary for the operation of the website
- cookies for analyzing the behavior of site visitors
- cookies for personalized advertising

### → Necessary cookies

First, cookies may be required to ensure the proper functioning of the website. For example, without cookies, it can be difficult for the website to remember that you are logged in or what choices have you made on the cookie banner. These are called necessary cookies. They are active automatically, without being conditioned by the visitor's consent.

### → Analytical cookies

Analytical cookies collect information about how visitors use a website, such as which pages are the most popular, which method of linking the pages is most effective, and whether users receive error messages from web pages. These cookies allow us to provide users with a high-quality user experience and serve to help improve the way our website works.

### → Cookies for personalized advertising

The use of advertising personalization cookies is a current standard of the most important websites you visit. This type of advertising helps us to reach the categories of customers interested in a certain type of product, to which the respective advertisements are displayed. Usually, the information about the categories that define the range of interested users is not personal data, but the profile created about visitors is based on the data collected through advertising profiling cookies and falls into the category of personal data. As these cookies are placed by services controlled by us, it results that the profiling (which is

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a processing of personal data) through these cookies is performed by us as a data controller. You can choose not to be profiled by Google for advertising purposes at [www.google.com/settings/ads](http://www.google.com/settings/ads)

**Recognid.com** will use by default only cookies that are strictly necessary for the good functioning of the website, while the other categories of cookies can only be used after your consent is given.

## Third Party Cookies

Third-party cookies (also known as tracking cookies, or trackers) are created by “parties” other than the website that the user is currently visiting – providers of advertising, retargeting, analytics, and tracking services.

Google's cookies are the most used cookies which track our marketing efforts.

### → Google

This website uses **Google Analytics**, a web analytics service provided by Google. Google Analytics uses cookies to help us constantly analyze how our website is used by visitors.

The information generated by the cookie about how you use the website (including your IP address) will be transmitted to and stored by Google. Google will use this information to evaluate how you used our website, compiling reports on website activity for website controller and providing other services relating to website activity and Internet usage.

Google Analytics script is implemented on our site through **Google Tag Manager**. Google Tag Manager does not install, use, or store cookies on your device. The service is used to enable tags of third-party scripts, such as Google Analytics, to be easily implemented and managed on the site.

Detailed information about [recognid.com](http://recognid.com) and third-party cookies you can find in the cookie table below:

Cookie Name	Expiry	Source	Purpose	Description
cookies_necessary	session	<a href="http://recognid.com">recognid.com</a> (first-party)	Necessary cookies	Cookies are used to retain visitor choices in the cookie banner.
cookies_access	1 year			
_ga	2 years	<a href="http://recognid.com">recognid.com</a> (first-party)	Analytical cookies	Google Analytics. Cookies are used to identify unique users and sessions, collect information about using the website. More information
_gat	24 hours			
_gat_*	1 minute			
_gid	24 hours			

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				you can find in <a href="#">Google Privacy Policy</a> and <a href="#">Types of Cookies</a>
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## Cookies can be blocked, disabled or deleted from your web browser

Most browsers are set to accept cookies. However, if you do not wish so, you can set your browser to refuse the use of cookies.

**You can get information and instructions on how to edit this feature depending on your web browser provider:**

[Mozilla Firefox](#) | [Internet Explorer](#) | [Microsoft Edge](#) | [Google Chrome](#) | [Opera](#) | [Safari](#)

You can also delete or manage cookies using settings of your browser at any time. Find out more about managing cookies depending on your web browser provider:

[Mozilla Firefox](#) | [Internet Explorer](#) | [Microsoft Edge](#) | [Google Chrome](#) | [Opera](#) | [Safari](#)

You should be aware that some sections of our website may not be available as usual if you reject or disable all cookies. This is not according to our own choice, but because some features of our website may not work properly without the use of cookies.

## Do you want to know more about our cookies?

Send your questions at [info@mdfin.com](mailto:info@mdfin.com) and we will provide you with all the requested information.

## 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](mailto: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 data anonymization, if we believe that this data could help us improve the quality of our products or services.

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## 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 the 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 European Commission, shall be made based on agreements using [Standard Contractual Clauses \(SCC\)](#) 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: [Adequacy protection – non-EU countries](#).

## Processing personal data of minors

[recognid.com](#) 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. [recognid.com](#) 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.



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- **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 data controller, 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 data controller 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 the Right of opposition below);
    - personal data have been processed illegally;
    - you withdraw your consent based on which the processing takes place;

Unless the processing is necessary:

- 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 (Office of the Commissioner for Personal Data Protection in the Republic of Cyprus) at [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy)

## To remember!

**Time period:** We will try to resolve your request within 30 days. However, the period may be extended for reasons regarding the specific 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.

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## How may we update this Privacy Policy?

We may periodically update this Privacy Policy in order to reflect changes in our practices or services. If we make any material changes in the way we collect, use and/or share information about you including information held in cookies, we will notify you by means of publishing a revised edition of the Privacy Policy on [recognid.com](https://www.recognid.com) website. The revised version will be in effect immediately and be noted by updated date to the end of this Privacy Policy.

## Exercising your legal rights:

To exercise your legal rights, please contact us in writing at [info@mdfin.com](mailto:info@mdfin.com)

This Privacy Policy last updated on the 11th of July 2023.