

## ENTAKSI SOLUTIONS SPA – ONFIDO INC

### Consent to process biometric data and sensitive data

ver. 1.0 of 15/10/2024

To continue, you must grant **Onfido Inc.** and its affiliates (together, **Onfido**), the service providers listed below (**Providers**), and the trust service provider and owner of this website/app **Entaksi Solutions SpA (Entaksi)** consent to collect, capture, obtain, possess, store, use, process, disclose and re-disclose (**Process**) your Biometric Data (defined below) and other personal data, including sensitive personal data (**Personal Data**), for the purpose described below.

By clicking "Accept", you agree you have: (1) read, understand, and accept [Facial Scan & Voice Recording Policy \(Policy\)](#) and [Terms of Service](#), (2) grant consent to Onfido, Entaksi and Providers to Process your Biometric Data and other Personal Data for the purposes described in the Policy and summarised below. If you do not agree, click "Do Not Accept" to exit without providing your Biometric Data. Onfido will not be able to complete the verification process and you will need to contact Entaksi for an alternative way to verify your identity.

**Personal Data:** If you consent, Onfido and Providers will Process your Personal Data, including:

- **Images:** images/videos (including audio recordings) of you captured via your device camera or otherwise uploaded.
- **ID Doc:** images (front and back) of your ID including the photo on your ID, ID number and other data extracted from your ID (e.g., name, DOB, gender, and data from your ID's machine-readable zone).
- **Biometric Data:** we may extract "scans of face geometry" and/or "voiceprints", from your Images and/or ID Docs, which may be considered biometric identifiers or biometric information.
- **Device Data:** location data, IP address, and other device data.

**Purpose:** Onfido and Providers Process your personal data on Entaksi's behalf, as part of the Onfido identity verification services. Entaksi, Onfido and Providers may use Biometric Data from your ID Doc and Images and other personal data to: (i) verify your identity or authenticate you and your use of Entaksi's services, including to compare Biometric Data from your Images and ID Doc; (ii) detect and prevent fraud, (iii) evaluate the authenticity of Images and ID Docs, including to look for signs of tampering, and detect whether they contain a genuine human or physical document, and (iv) improve and develop Onfido's services, where permitted by applicable law.



**Retention:** Biometric Data is retained by Onfido only until the initial purpose for which it was collected has been satisfied and will be securely deleted within three-hundred and sixty five (365) days after you submit your Images and ID Doc. Images and ID Docs may be stored by Onfido for up to three (3) years after you submit them. After the applicable retention period, Onfido permanently destroys the data, unless otherwise required by law or legal process. (Please refer also to [Entaksi's own privacy related policy](#) to understand how long the Entaksi may retain that information).

**Disclosures:** Biometric Data and other personal data may be disclosed: (1) to our Providers, namely Microsoft Ireland Operations Limited (whose technology is used to convert your voice recording into written text (Speech to Text)) and Amazon Web Services (who provides another Speech to Text service as well as Onfido's cloud storage), who Process this data on our behalf; (2) to Entaksi, to complete a Company transaction as requested and authorized by you; (3) as required by state or federal law or municipal ordinance; (4) as required pursuant to a warrant or subpoena; and (5) as expressly consented to by you or your authorized representative.

**Withdrawal of Consent:** If you consent now but would like to later withdraw your consent, please contact Entaksi at [privacy@entaksi.eu](mailto:privacy@entaksi.eu)  
Entaksi has also appointed a Data Protection Officer that can be contacted at [dpo@entaksi.eu](mailto:dpo@entaksi.eu) in the event of questions regarding the protection of personal data.