

Privacy Policy

Version 1.0 | Last updated 03.11.2021

This Privacy Policy covers the TezID website <https://tezid.net> and its services.

Surf Labs AS may in certain situations collect and process personal data about you.

We process personal data in accordance with the principles in EU's General Data Protection Regulation ("GDPR") and the Norwegian Personal Data Act and will only process personal data which are necessary for our business and services. The personal data Surf Labs AS processes shall be adequate, relevant and limited to what is necessary to fulfil the purpose of the processing. This implies that Surf Labs AS shall process as little personal data as possible that belong to e.g. subscribers to publications, customer data and eventually others.

This privacy notice explains what information we collect, what we use information for and who we give that information to. It also sets out your rights and who you may contact for more information or queries. Therefore, please read this text carefully in order to understand how we process your personal data.

This privacy policy was last modified on: 29th of October 2021

Topics:

- Which data do we collect about you?
- The legal basis for the collection and processing of your personal data
- From whom do we collect your personal data?
- Who do we share your personal data with and why?
- Who do we transfer your personal data to?
- How long do we store your data?
- Your rights
- Contact details
- Revision to this privacy notice

1. Which data do we collect and for which purposes

a) Visitors to the Website

We may collect and process the following personal data when you enter our website:

- Standard internet log information, including IP address, browser type and language, visiting hours and referring URLs
- Email address, phone number and other information relevant to the verification of proofs
- Passbase verification result

Any data stored is encrypted and cannot be decrypted by us except in cases where the user has explicitly allowed this (KYC purposes).

The TezID website makes no use of cookies or tracking images.

The personal data listed above is collected and processed for the following purposes:

- To measure the success of our dissemination activities.
- To measure how well our websites perform.
- To ensure an adequate level of information security for our websites
- To optimize our services
- To give you the possibility register proof in the Tezos Blockchain
- To give you services for verifying ownership of id or other assets

2. The legal basis for the collection and processing of your personal data

We collect and process your data based on the following legal basis:

- Consent (see GDPR article 6 paragraph 1 (a))
- Performance of a contract (see article 6 paragraph 1 (b)).

When Surf Labs AS is a data processor on behalf of its customers (“**Customer**”) the customer must provide a sufficient legal basis for the collection and processing of personal data. The Customers legal basis for the processing activity in question will be covered by the data processing agreement entered into between the Customer and Surf Labs AS.

3. From whom do we collect your personal data?

We collect your personal data from you and we also receive your verification result from Passbase.

4. Who do we share your personal data with and why?

In connection with one or more purposes outlined above, your personal data may be disclosed to and shared with the following recipients:

- public authorities;
- our professional advisors (e.g. auditor and legal advisors);
- vendors;
- KYC customers;

5. Who do we transfer your personal data to?

Transfer of personal data to data processors

We may transfer your data to IT providers, including cloud service providers, or to vendors of external services, who process and/or store the personal data on our behalf. In such cases, Surf Labs AS has entered into agreements to maintain information security at all stages of the processing.

Transfer of personal data to data controllers

We may transfer your personal data to other data controllers, e.g. if Surf Labs AS has a legal obligation to transfer the data to public authorities.

Transfer of personal data to recipients in countries outside the EU/EEA

We may transfer your personal data to recipients located in countries outside the EU/EEA for the purposes listed in section 1. The transfer may only take place if there is an adequate level of protection in place. The basis for the international transfer is Standard Contract Clauses.

6. How long do we store your data?

We store the personal data for as long as necessary to fulfil the purposes above. Your personal data will be deleted in accordance with the Surf Lab AS's retention policy, which can be viewed and accessed here:

<https://tezid.net/data-retention-policy.pdf>.

7. Your rights

Subject to the conditions set out in the applicable Data Protection legislation, you enjoy the rights set out below. In the following, you can read about your rights, and how to perform them.

- **The right to request access to your personal data**

You can send us a request for access to get information about whether we process personal information about you, and thus gain insight into what information we process about you if you are registered.

- **The right to rectification of your personal data**

If you believe the information we have stored about you is incorrect, you can request that we correct this at any time.

- **The right to erasure of your personal data**

You can withdraw your consent to process personal data at any time. If you withdraw your consent, we will delete, as far as possible, your personal information that is processed on this basis.

- **The right to restriction of processing**

If you do not wish us to delete your information but want us to stop processing them in ways other than storage, you may, under certain circumstances, have the right to request this.

- **The right to data portability**

According to Article 20 of the GDPR you have the right to data portability for personal information about yourself that you have given to Surf Labs AS and which has a basis for processing in consent or agreement. If you wish to exercise your right to portability, the relevant information from your profile will be exported to an editable format and handed over to you.

- **The right to objection to the processing of your personal data**

You have the right to object to processing of personal data concerning you, where the processing is based on legitimate interest of Surf Labs AS or public interest. If so, Surf Labs AS will no longer process your personal data unless there is a legitimate ground for doing so which, according to a balancing test, is overriding.

- **The right to lodge a complaint**

You also have the right to lodge a complaint with the competent supervisory authority. In Norway this is 'Datatilsynet' (the data protection authority). Complaints can be submitted on their websites by following this link: datatilsynet.no

8. Contact

If you have any questions regarding the protection of your personal data or if you wish to exercise your legal rights, please contact us by sending an e-mail to: support@tezid.net

Contact info Surf Labs AS:

Surf Labs AS org. nr 927 669 277
Frøyerhagen 8
4328 Sandnes

9. Revision of our privacy notice

We keep our privacy notice under regular review and thus the notice may be subject to changes. The date of the last revision of the privacy notice may be found on the top of the page.