

Yoti privacy and cookies policy

Last updated on: 6 November 2017 - what's new

In this policy, we explain how we will handle your personal information when you sign up and use our app, Yoti dashboard and website (www.yoti.com).

Where we say 'we' and 'us' we mean Yoti. Where we say 'third party' this means anyone who is not you or us. This could be another person or an organisation.

As transparency and privacy are core values, we regularly check and update this policy to reflect new features and functionality. We have a lot of new features and functionality planned, so to avoid having to issue a new privacy policy every month, there may be information about things that aren't quite in place yet, but they will be soon. Regularly reviewing this policy makes sure that you are always aware of what information we collect, how we use it and how we might share it.

Who we are

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Who we are

- We are a digital identity platform and we design our software and services with privacy at their heart, guided by a set of principles.
- We are monitored by a Guardian Council who make sure that we always seek to do the right thing.
- We are certified as a B Corp company, meaning that we consider the impact of our decisions on employees, consumers, the community and the environment.

[Learn more](#)

Company details

Our principles

Company details

We are Yoti Ltd, Fountain House, 130 Fenchurch Street, London, EC3M 5DJ (company number 08998951), but you can call us 'Yoti'. Our general email address is hello@yoti.com.

Our principles

We take your privacy very seriously. We design our software and services with privacy at their heart, guided by a set of principles which you can read here: <https://www.yoti.com/about/journey/>.

We are monitored by a Guardian Council, who are respected and influential individuals who make sure that Yoti always seeks to do the right thing, and that we are transparent about what we are doing and why. Read more about them here: <https://www.yoti.com/about/council/#about-navbar>.

We are also certified as a B Corp company, meaning that we consider the impact of our decisions on employees, consumers, the community and the environment. Read more about it here: <https://www.bcorporation.net/>

Information collection and use

We collect information about you to set up your Yoti account, when you add documents, when you use the app, when you use Yoti Password Manager, and when you register for Dashboard.

We use it to do things like:

- create your account and provide the products / services;
- check you don't already have an account;
- check the document you add is genuine and the photo matches your account set-up photo;
- check you're a real live person;
- verify details;
- check for fraud;
- authenticate you when you make certain requests, such as to delete your account.

[Learn more](#)

Creating an account with Yoti

Checking you are a real person

Yoti Dashboard

Adding information to your Yoti

Yoti Password Manager

Backing up your account

If you lose access to your Yoti account

Using your Yoti

Yoti website

Creating an account with Yoti

What we collect	What we do with it
Your mobile number	To create your account in the app. To check you do not already have an account with Yoti – users are only allowed to have one account. We encrypt your mobile number (which means we can't access it) and keep it until you or we close the account and delete the information.
Your photo	To create your account in the app. We securely store a biometric template of your photo to verify that it is always you trying to access your Yoti account. A biometric template is a digital map of your face created from your photo. Yoti also securely stores the actual photos.
Information from in-house and third-party analytics tools	See sections on cookies and analytics

Checking you are a real person

Video of you saying some words	This helps us to make sure you are a real live person. We delete the video after 7 days, if not before.
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Yoti Dashboard

This will let you see all your receipts from sharing your information. Organisations can also set up an account to create pages and applications to request and receive information from their customers.

For users

What we collect	What we do with it
Photo	To register you for an account with Yoti Dashboard and to login after that.

For organisations

What we collect	What we do with it
Photo, name, date of birth, email address and mobile number	To register you for an account with Yoti Dashboard and to login after that.
Organisation details, administrator and director details	To administer your account To send you account information and updates To confirm with the Director listed that the use of Yoti and the administrator are authorised.

Adding information to your Yoti

What we collect	What we do with it
Information from Government-issued identity documents (for example, passport, driving licence)	We use the information to verify your identity and check the document is valid, and check that you are over 12. You will not be able to add an expired passport or driving licence. We check the document photo against the photo you took to set up the account, to check it's your document. It may be sent to our Security Team for a manual check. We use the photo and your date of birth (which we hash) to check if your identity already exists. Users can only have one account. We may check your information against fraud prevention databases where your document fails our internal fraud prevention checks. While we verify your identity the information is kept securely but our Security Team can access it. We can access this information up to 7 days after verification.

	<p>We then add the details to your Yoti account and keep this information encrypted on our servers (which means we can't access it) until you or we close the account and delete the data.</p> <p>We create general statistics and reports from some of this information to help us understand how people are using our app, and to allow us to improve the service. This information does not identify any specific user. See the sections on cookies and analytics for more information.</p> <p>Where you provide a name, address and date of birth we will verify these details with credit reference agencies.</p> <p>This will leave a footprint on your credit file, which does not affect your credit score.</p>
Aadhaar (name, date of birth, Aadhaar number, gender and (optional) address).	<p>We will redirect you to our tech partner and then onto our trusted KYC partner who are authorised to check your details against the Central Identities Data Repository (CIDR).</p> <p>The KYC partner sends the details to the tech partner, who do the matching and provide Yoti with a yes or no and your photo.</p> <p>The tech partner deletes all the information (except the photo) as soon as the check is complete. The photo is kept on a Yoti server in India for 7 days in case our Security Team need to manually check it.</p>
Age attribute (for example, 18+)	<p>We convert your date of birth into an age attribute so that in some circumstances you won't need to share your date of birth to prove your age or eligibility for a product or service.</p>

Yoti Password Manager

What we collect	What we do with it
<p>Username, passwords, URLs, website names, and any login specific settings you choose to set</p> <p>Passwords you generate using our password generator</p> <p>Information you provide to use the auto-complete feature</p>	<p>We store the information so you can use Yoti Password Manager to log into websites without having to remember your login details, and so you can automatically fill in your information.</p>

Information from in-house and third-party analytics tools	See sections on cookies and analytics
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Backing up your account

We store an encrypted key in the cloud you choose for back up so that you can recover access to your account on a different phone.

If you lose access to your Yoti account

For example, you have lost your mobile phone, can't log in and need to recover access to it

What we collect	What we do with it
The encrypted key from your cloud	We retrieve this to restore your link to your account.
PIN, photo and video	<p>To verify your identity and check you are the true holder of the Yoti account and grant you access to it again or to reset your PIN.</p> <p>If you forget your PIN we will ask you for your mobile number and date of birth (if you have added a document).</p> <p>While we verify your identity we keep the information but our Security and Customer Support Teams can access it. We can access this information for up to 7 days after verification.</p>

Using your Yoti

What we collect	What we do with it
App login details	To log you into your Yoti
Information from in-house and third-party analytics tools	See sections on cookies and analytics
Information about issues and problems you have with the app	<p>If the app crashes, or you have some other issue, you can contact us about it by email, from within the app or through the website.</p> <p>You can also choose to share certain data with us to help us find the server logs for your phone so that we can identify and fix the issue. The information you send comes to us by e-mail and if you have an email address on your Yoti account, you will receive an acknowledgement email with a ticket number for your issue.</p>

	<p>This creates a Yoti Customer service account for you so you can revisit your ticket(s) to see progress and contact us further about the issue or any other issue.</p> <p>On the back end, we associate your server log information with a reference number (for example, 3bbf6e6fe414b40bf9fed99c8d36bd2c) but we do not connect it to you personally. This log information is deleted after 6 months.</p> <p>Once we have resolved your issue and / or closed the ticket, we will send you an email asking for feedback. We only use this information to improve our services.</p>
<p>Anonymous information that does not identify any specific user about what types of information you have shared with third parties.</p>	<p>This information allows us to charge organisations for the information they get from you.</p> <p>For example, we may charge an organisation more for receiving 5 pieces of information from you through Yoti, than we would charge an organisation who only received 3.</p>

Yoti website

What we collect	What we do with it
<p>Contact details when you fill in the 'Contact us' form</p>	<p>To reply to your query</p>
<p>Information from in-house and third-party analytics tools</p>	<p>See sections on cookies and analytics</p>

Information sharing

You choose if you want to use Yoti to share your information with other individuals or with companies. You will get a receipt of any sharing you do.

Where we have access to your information, we may share it in specific circumstances, such as:

- suspected or confirmed identity fraud or other offences;
- valid and legally binding requests for information from third parties;
- to verify your details;
- where a company you are sharing details with requests further checks with third parties that we are able to provide.

We do not sell your information.

[Learn more](#)

When Yoti shares your personal information

When you share your personal information

Always allow

When Yoti shares your personal information

While we verify your account, for a short period of time after you register or add information, your account will be pending and Yoti will be able to access your personal information.

Yoti's core principles are that it is not our business model to sell, transfer or share outside the company any of the personal information used to set up your account or your user activity information.

There are though some situations where we will share or will have to share some information, and we list these below.

Situation	Who we share your data with
If we suspect a registration may involve identity fraud, a national security threat, legal infringement, a criminal offence	We may have to share a copy of your information with the appropriate authorities.
If you provide false or inaccurate information	<p>If, after investigation, we determine that there has been fraud that meets the criteria for reporting, we will pass the details to relevant crime and fraud prevention agencies to prevent further fraud and money laundering.</p> <p>You can get more information about our approach to fraud and misuse and explaining how the crime and fraud prevention agencies will use the information by emailing privacy@yoti.com.</p>

<p>If we get a request for user information from a law enforcement or other official authority</p>	<p>We cannot provide your information that is encrypted in our database unless either you, or a third party you shared your information with, provides us the receipt from your sharing activity, as this contains the decryption key necessary to access the personal information you shared with that third party.</p> <p>We have an internal policy and process to make sure that, where we are able to share information, the request is valid, the information requested is no more than necessary, and that we think it's the right thing to do.</p> <p>We may have a legal obligation to share the information if we receive a court or similar legal order ordering us to disclose it.</p>
<p>If you have provided your name, address and date of birth</p>	<p>We will check this information against credit reference agency data as part of verifying your identity.</p> <p>This check leaves a footprint on your credit file, which will reference an identity check by Yoti. This footprint does not affect your credit score.</p>
<p>Some companies using Yoti will request an identity check against credit reference agency data</p>	<p>If you agree, Yoti will send your name, address and date of birth to the credit reference agency on behalf of the company, and will send back to the company the response from the credit reference agency.</p> <p>This check leaves a footprint on your credit file, which will reference an identity check by Yoti. This footprint does not affect your credit score.</p>
<p>When you create an organisation account on Dashboard and provide corporate details, including of one of your Directors</p>	<p>We will publish the company name and address, corporate contact details (that you provide for users) and director's name in our searchable database for Yoti users to find out where they can use their Yoti.</p> <p>Users have to login to access the database and can only search on 5 organisations a day.</p>
<p>We may use the services of other businesses to help us in certain areas, for example, for data storage; online payment providers; and</p>	<p>Because of how we have designed the system, in most situations we won't need to share your information with third parties.</p>

identity providers who we use to help with identity verification	If we do, we will encrypt your data and / or it will be properly protected by the terms of our contract with these third parties.
If Yoti sells its assets	<p>Yoti will only agree to the sale if the new business commits to the core Yoti principles of data privacy.</p> <p>While we are negotiating with the company buying or combining Yoti with their own business, they won't be able to access your encrypted personal information but Yoti may provide anonymised statistical information.</p>

When you share your personal information

You alone will decide when you want to use your Yoti to identify yourself to a third party, or to swap, send and request information. You choose whether to agree or not to share the information the third party requests. If you decide to share your information with a third party, you will both receive a receipt which will contain a copy of the information that each party shared.

Yoti encourages companies to only ask for the information they actually need, for example, your age, or confirming you are over 18, rather than a full date of birth. If you choose to share your information with a third party using Yoti, those third parties may choose to use that information to communicate with you or they may share that information with others. We suggest you read the privacy policies of any organisation you share your information with to understand how they will use your personal information.

Yoti creates and encrypts a master receipt which contains the details of what information was shared and who with. This master receipt is securely stored on our servers and we cannot access it unless either you or the third party provides us with their own receipt containing the encryption key we need to access the information.

Always allow

We provide a feature to some companies, for some scenarios, where you can choose to automatically share the same information each time you interact with them. Usually, you scan a QR code to see what information the company is asking for, and you are asked whether you want to allow the sharing of your information. With 'Always Allow' you can cut out the approval step. This may be useful to save time for some transactions you carry out often, where the same information is requested from you each time.

Security

The information you provide is stored separately and encrypted in secure locations. Once your account is set up, we have no access to your information. Only you have access to use the products to share your information as you choose.

We continually test our systems and are ISO 27001 certified, which means we follow top industry standards for information security.

[Learn more](#)

Your encrypted information

Sending your personal information to other countries

Your encrypted information

Except for the biometric template and photos, as mentioned in the 'Information collection and use' section, we do not have access to your personal information that we have verified and stored on our servers. The only way we can access the information is if you provide us with the encryption key (which is a set of unique numbers stored securely on your device). Only you hold the keys to decrypt your account information.

Sending your personal information to other countries

We currently keep your personal information in the UK.

In future we may send your personal information to countries outside the UK. If those countries are in the European Union, Switzerland, Iceland, Liechtenstein and Norway, there are equivalent laws on handling personal information and so your information is protected in the same way as it is in the UK.

If we send your personal information to any other countries (for example, we may have other databases and servers in other countries), some of these countries may not have equivalent laws on handling personal information. However, we will make sure that your personal information is properly protected.

In some countries, for legal or practical reasons, Yoti may have to store personal information in that country.

When we decide to send or store your personal information in another country, we will update this section to describe the protections we have put in place (unless they are already described in another relevant section).

Your rights and choices

You can see all the information we hold on you by accessing our products (such as the app or Dashboard).

If you need to update information you can do so.

You can opt out of certain analytics in the app.

If you want to delete your information, you must use the 'delete account' option in the app. If you just delete the app then the link to your information is lost and it will remain in our system with no way to find it.

[Learn more](#)

Access rights

Correction rights

Deletion rights

Objection rights

Complain to the ICO

Access rights

You are entitled to see the personal information we hold about you.

We do not have access to your personal information that we have verified and stored on our servers. The only way we can access the information is if you provide us with the encryption key (which is a set of unique numbers stored securely on your device). Only you hold the keys to decrypt your account information.

You can access all the personal information we hold on you through your Yoti app.

When you use your Yoti, we collect some information about your phone and how you are using the app, Dashboard and website. This information is collected and stored automatically through in-house and third-party tools, as set out in the sections on cookies and analytics.

In-house analytics

The information we collect is de-identified and aggregated and it is not possible to search or get the information using your name or your phone's identifiers (for example, the IMEI number which is like a serial number for your phone). So we cannot provide you with this information as it is not linked to you specifically.

Google Analytics information

For each phone that is using our app Google creates and shares with us an identifier (such as, 76c24efd-ec42-492a-92df-c62cfd4540a3). The information that we collect from your phone through Google Analytics is linked only to this identifier, and so it is not possible to search or get the information using your name or your phone's other identifiers (for example, the IMEI number which is like a serial number for your phone). So we cannot provide you with this information as it is not linked to you specifically.

You can make an access request to Google here: <https://support.google.com/policies/contact/sar>

Correction rights

You are entitled to correct personal information we hold about you that is inaccurate.

If you think that any of the information in your Yoti account is not accurate, you can update it at any time through your account. Yoti only has access to the information in your account for up to 7 days after it is first provided to Yoti.

If you change your name, you can only update your Yoti by adding a government-issued identity document with the new name.

Deletion rights

In certain circumstances you are entitled to ask us to delete the personal information we hold about you.

If you want to close your account and delete your information, please read our FAQs here:

<https://yoti.zendesk.com/hc/en-us/sections/202203845-Managing-my-Yoti-account>

If you have any other deletion request, please email: privacy@yoti.com

Objection rights

In certain circumstances you are entitled to object to Yoti processing your personal information.

If you want to contact us about your objection rights, please email: privacy@yoti.com

Complain to the ICO

You can also complain to the Information Commissioner's Office (ICO) who is responsible for making sure that organisations comply with the law on handling personal information.

<https://ico.org.uk/global/contact-us/>

Cookies

We use cookies on our website and on Yoti Dashboard to provide the service, collect anonymous information and for security purposes.

[Learn more](#)

What's a cookie?

Types of cookie

Categories of cookies

How do I delete cookies?

Yoti website cookies

Yoti Dashboard cookies

What's a cookie?

It's an online technology to collect information about you and to store your online preferences. Cookies are small pieces of information sent by a web server to a web browser which allows the server to uniquely identify the browser on each page.

Types of cookie

Session cookies

These expire when you close your browser and do not remain on your computer.

Persistent cookies

These are stored on your computer until they expire or you delete them from your cache. They are normally used to make sure the site remembers your preferences.

Categories of cookies

Strictly necessary cookies

These cookies are essential for you to move around our website and Dashboard and use their features. Without these cookies we cannot provide services you have asked for, such as access to secure areas.

Performance cookies

These cookies collect anonymous information on how people use our Dashboard and website.

Functionality cookies

These cookies remember choices you make, such as your last action, language and search preferences. We can use these to provide you with a better experience based on your preferences. The information from these cookies is anonymous and they cannot track your browsing activity on other websites.

How do I delete cookies?

Go to the help and support area on your internet browser for instructions.

Information on deleting or controlling cookies is also available at www.allaboutcookies.org

If you delete or disable our cookies you may not be able to access certain areas or features of our site.

Yoti website cookies

Name of the cookie	Type of cookie	What we do with it
yoti_ignoreCookieBanner	Functionality cookie	Used to know that you have seen the cookie banner, and so not to show it you again.
_ga	Performance cookie	(Google Analytics and Adwords) Used to show us how users arrive at and interact with our website. It helps highlight areas where we can improve and shows us how successful our marketing campaigns are.
_gat	Performance cookie	Used by Google Analytics to prevent attacks on their servers.
_gid	Performance cookie	Used by Google Analytics to distinguish users from each other.
Visual Website Optimiser	Functionality and performance cookies	VWO anonymously tracks where people click on our website allowing Yoti to generate a diagram highlighting the most active areas, as well as count how many times users click on a certain link or button. We use this technology to understand how people use our website and to test different content, so that we can improve the website. You can find information on the specific cookies used by VWO here: https://vwo.com/knowledge/cookies-used-by-vwo/

Yoti Dashboard cookies

Name of the cookie	Type of cookie	What we do with it
_yop	Strictly necessary cookie	Stores only a session ID (no user data).

_csrf	Strictly necessary cookie	Security feature to prevent account hijack.
xsrftoken	Strictly necessary cookie	Security feature to prevent account hijack.
connect.sid	Strictly necessary cookie	Stores only a session ID (no user data).
channel_id	Strictly necessary cookie	Used to identify which mobile to communicate with.
privateKey	Strictly necessary cookie	Used for decrypting personal information - no data from this cookie goes to Yoti.
publicKey	Strictly necessary cookie	Used to encrypt personal information.
refId	Strictly necessary cookie	Used with channel_id and is also used to identify which mobile to communicate with.
signedPublicKey	Strictly necessary cookie	To prove ownership of the Public Key.
ngStorage-ageLink	Strictly necessary cookie	Used to store the URL of a Yoti Connect Page.
ngStorage-profile	Strictly necessary cookie	Temporarily stores user's avatar, date of birth and age - no data goes to Yoti.
_ye	Strictly necessary cookie	A session cookie used to store a user ID.
_ys	Functionality cookie	Stores data about the mobile a user is using. It also stores the ID of a Yoti App being shared, data sharing between Yoti users, and the last action a user was about to perform before installing the app.
acknowledgedBanners	Functionality cookie	Hides a banner telling you to add an admin email once you have dismissed it.

Analytics

We collect information about your device and your use of our products using in-house analytics and third-party tools. The information we collect is de-identified and aggregated so we can't identify you personally. We use it to understand how our products are being used and to improve them.

You can opt out of certain analytics in the app.

[Learn more](#)

What are analytics and why do we use them?

Yoti website analytics

Yoti app analytics

What are analytics and why do we use them?

Analytics means collecting and analysing information about activity on our website and in our app. None of our analytics provide information about you personally. The statistics we get from this data allow us to understand how people are using our website or app, and things like what works and what doesn't, how long it takes to complete critical tasks and where we have users.

All these statistics are essential to understanding how our website and app are performing and identify where we need to focus our efforts to improve.

Yoti website analytics

Facebook, Twitter and Google Adwords pixels

These track activity on the website such as when a user completes an activity (for example, clicking through, completing a purchase, downloading the app). We use this to determine which platform users come to Yoti from, and to understand what actions users take once they arrive at Yoti. For more information, please see:

- <https://www.facebook.com/business/help/651294705016616>
- <https://business.twitter.com/en/help/campaign-measurement-and-analytics/conversion-tracking-for-websites.html>
- <https://support.google.com/adwords/answer/1722054?hl=en-GB>

Visual Website Optimiser

VWO anonymously tracks where people click on our website allowing Yoti to generate a diagram highlighting the most active areas, as well as count how many times users click on a certain link or button. We use this technology to understand how people use our website and to test different content, so that we can improve the website.

Yoti app analytics

Adjust

We use Adjust performance and analysis technology in our app. This allows us to track and analyse which marketing channels or sources are producing the best results in directing users to download the Yoti app, and to help us understand how our users are using our app. When you launch the app, Adjust collects information on user activity (such as clicks and when you install the app), as well as when certain events happen (such as completing registration, successfully adding

an ID document, adding a password to Yoti Password Manager, deleting the account and so on).

To provide this service, Adjust uses three identifiers which they anonymise using a technology called 'hashing'. One identifier is one that Apple AppStore or Google Play gives your phone (depending on which app store you visited), The second identifier is your IP address which is like an address for your phone from your mobile network provider, and which may change if you take your phone to a different location. The third identifier is your MAC address, which is a unique number the phone manufacturer gives to the parts of your phone that connect to the internet. The hashing technology Adjust uses to anonymise these identifiers means that it is not possible to identify you or your mobile individually. Adjust then provide us with aggregated information.

We use Adjust with different advertising networks that allow us to show Yoti adverts on these networks. Adjust also pass back this aggregated information to these networks so they can improve their systems and do better at targeting relevant advertising.

See section 2 of Adjust's privacy notice for more information:

https://www.adjust.com/privacy_policy/

You can opt out of Adjust analytics in the settings in the app.

In-house and Google analytics

Using our in-house software, and using Google Analytics, we collect some information from users and some information on when certain things happen as you use the app. This information includes information about your phone. Our in-house software does not track how you personally use our app.

The information is de-identified so that it is not associated with an identifiable user. The information provides us with statistics on things like:

- the number of people installing the app;
- the number of accounts created successfully;
- how long it takes on average to carry out certain actions in the app, such as taking a photo, uploading a document;
- how many addresses are uploaded from a document and how many are manually added;
- the number of account backups, account recoveries, and account deletions;
- the percentage of people who stop using the app at certain key points, such as accepting the terms and conditions, taking a photo and so on;
- the number of users per country, age band, and gender.

These statistics are crucial for us to understand how our app is performing, where things are failing, and what kinds of users we have. This information helps us to understand where we need to focus our business, marketing and product development efforts and what app improvements we need to make.

Yoti Password Manager

We use Google Analytics and our in-house analytics to understand the following.

- What percentage of overall registered Yoti users also registered for Password Manager
- How many active Password Manager users there are
- How many users use Password Manager for at least one website
- How many users per country: based on a truncated IP address to give the country
- Which browser is used: Chrome, Mozilla, Safari or Internet Explorer

- Total number of uses of Password Manager in a day, week and month (not per user)

Contact us

E-mail: privacy@yoti.com; hello@yoti.com

Website: <https://www.yoti.com/contact/#contact-us-choose>

FAQs: <https://yoti.zendesk.com/hc/en-us>

Address: Yoti Ltd, Fountain House, 130 Fenchurch Street, London, EC3M 5DJ

What's new

Last updated on 6 November 2017

Section	Changes
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All sections	
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- We have made general improvements to the presentation and layout of many sections, and consolidated information where it was duplicated.

Information collection and use	
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- We have added in information for Indian users about our use of Aadhaar data when you add this to your Yoti.
- We have also made some amends to update information on our use of your data to reflect some internal changes, specifically around internal checks to make sure you only have one account, and new functionality, such as in relation to Dashboard.

Information sharing	
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- We have removed information relating to MyVenue products developed by our sister company Yoti External Applications Ltd, as this now has its own privacy notice on the MyVenue websites.

Your rights and choices	
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- We have added information on our in-house analytics to the section on access rights.
- We have added a contact e-mail for deletion requests other than closing your account.

Cookies and analytics	
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- We have separated this into two sections so it is clearer.