

## Yoti privacy and cookies policy

Last updated on: 14 May 2018 - 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](http://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

Information collection and use

Information sharing

Security

Your rights and choices

Biometrics

Other GDPR information

Cookies

Analytics

Contact us

## 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.

## 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](mailto: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.

Creating an account with Yoti

Checking you are a real person

Adding information to your Yoti

Yoti Dashboard

Yoti Password Manager

Yoti Sign

Recovering your account

Using your Yoti

Yoti website

### Creating an account with Yoti

What we collect	What we do with it
Your mobile number	<p>To create your account in the app.</p> <p>To check you do not already have an account with Yoti – users are only allowed to have one account.</p> <p>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.</p>
Your photo	<p>To create your account in the app.</p> <p>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. We keep this information until you or we close the account and delete the information.</p> <p>See section on biometrics for more information.</p>
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 aloud some words you see on the screen	<p>This helps us to make sure you are a real live person. We delete the video after seven days, if not before.</p> <p>We may use some videos within the seven-day window for internal testing to improve our security checks.</p> <p>We use some sections of the video for internal research and development to improve our fraud prevention measures. See section on biometrics for more information.</p>
--	--

## Yoti Dashboard

This will let you see all your receipts from sharing your information. You can download receipts as a CSV file. Organisations can also set up an account to create pages and applications to request and receive information from their customers. You can also archive applications and delete receipts.

### For users

What we collect	What we do with it
Photo	<p>To register you for an account with Yoti Dashboard and to login after that.</p> <p>We keep it until you or we close the account and delete the information.</p>

### For organisations

What we collect	What we do with it
Photo, name, date of birth, email address and mobile number	<p>To register you for an account with Yoti Dashboard and to login after that.</p> <p>We don't keep the login information and we keep the registration information for five years from when you or we close the account.</p>
Organisation details, administrator and director details, and other relevant contacts, such as for billing or technical information	<p>To administer your account</p> <p>To send you account information and updates</p> <p>To confirm with the Director listed that the use of Yoti and the administrator are authorised.</p> <p>We keep the information for five years from when you or we close the account.</p>

## Adding information to your Yoti

What we collect	What we do with it
<p>Information from Government-issued or other official identity documents (for example, passport, driving licence)</p>	<p>We use the information to verify your identity and check the document is valid, and check that you are over 13. You will not be able to add an expired passport or driving licence.</p> <p>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.</p> <p>If you upload a CitizenCard, we will verify it against the CitizenCard database.</p> <p>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.</p> <p>We may check your information against fraud prevention databases where your document fails our internal fraud prevention checks. We keep fraud information either in line with our internal fraud and misuse policy or the retention rules set by relevant fraud prevention bodies.</p> <p>While we verify your identity the information is kept securely but our Security Team can access it, and may do so for training, compliance and quality assurance purposes. We can only access this information up to seven days after verification.</p> <p>Where we identify fraudulent or tampered with documents, we will keep some for up to two years as examples to use in internal staff training.</p> <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 your document includes an address we will verify this with a third party.</p> <p>In the UK this is Callcredit. This will leave a footprint on your credit file, which does not affect your credit score. For other countries this is Aristotle.</p>

<p>Information you add manually (for example, address, e-mail)</p>	<p>If you add an email address we will verify it by sending you a code.</p> <p>If you add an address you can choose to verify it with a third party. If you don't verify it, or the check fails, your address will be marked as 'unverified'. You can still share it, but some organisations may only be able to accept verified addresses.</p> <p>Third-party checks: In the UK this is Callcredit. This will leave a footprint on your credit file, which does not affect your credit score. For other countries this is Aristotle.</p> <p>We keep the information until you or we close the account and delete the information.</p>
<p>Aadhaar (name, date of birth, Aadhaar number, gender and (optional) address).</p>	<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. For this specific activity, we store the data in AWS India.</p> <p>The tech partner deletes all the information as soon as the check is complete.</p>
<p>Age attribute (for example, 18+)</p>	<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 (YPM) to log into websites without having to remember your login details, and so you can automatically fill in your information.</p> <p>We keep the information until you or we close the account and delete the information.</p>
<p>Information from in-house and third-party analytics tools</p>	<p>See sections on cookies and analytics</p>

## Yoti Sign

### Document owners: information collection and use

What we collect	What we do with it
Email address	<p>To set up your Yoti Sign account and to log in.</p> <p>We create a Yoti ID so you can easily log back in and so you can see all your Yoti Sign history in your account. This ID will not appear in your account.</p> <p>The ID is unique to your Yoti account and if you delete your Yoti account you will lose your Yoti ID. If you then set up a new Yoti account you will have a new Yoti ID, but Yoti Sign will not be able to link the two IDs. See below on deleting your account.</p> <p>Yoti will only use the ID to bill accurately for the information shares you receive, as it allows us to know how many shares were from unique users and how many from returning users. We have no way to link the IDs to any specific Yoti user, it simply tells us how many information shares there were for your documents.</p>
Documents you upload	<p>Store the document.</p> <p>Send it to those you want to sign the document.</p>
Information about recipients you enter: Name Role (for multiple people signing the same document) Email address Unique reference (for bulk signing)	<p>To send the document to the recipients for signing.</p> <p>Name and email address are mandatory.</p> <p>The unique reference is optional and allows you to identify users individually, for example, if they have the same name.</p>
Attributes of recipients you can request: Email (compulsory) Name Gender Address Date of Birth Phone number ID photo Nationality	<p>To populate the document that you are sending to the recipient to sign.</p>
Reminders you set	<p>Send reminder emails to those who haven't signed the document.</p>

Information on when documents are sent and signed. Information on when emails are delivered and opened.	This information creates an audit trail that the sender can access. This audit trail can be used in court if necessary.
--	---

**Document recipients: information collection and use**

<b>What we collect</b>	<b>What we do with it</b>
Email address	<p>To log in to Yoti Sign and authenticate you. Your email address is how you send and receive documents within Yoti Sign.</p> <p>We create a Yoti ID for you so that if you decide to create a Yoti Sign account, all your Yoti Sign history as a recipient is available. This ID will not appear in your account.</p> <p>The ID is unique to your Yoti account if you delete your account you will lose your Yoti ID. If you then set up a new Yoti account you will have a new Yoti ID, but Yoti Sign will not be able to link the two IDs. See below on deleting your account.</p> <p>Yoti will only use the ID to bill companies accurately for the information shares they receive, as it allows us to know how many shares were from unique users and how many from returning users. We have no way to link the IDs to any specific Yoti user, it simply tells us how many information shares there were for each document.</p>
Attributes (personal details) specified by document sender	<p>To populate the document with your details and sign it. These are stored in our database and used to update tags. The document sender can also use your details to search for particular users in a large document, for example, to check for runners in a liability waiver document.</p>
Information on when documents are sent and signed. Information on when emails are delivered and opened.	This information creates an audit trail that the sender can access. This audit trail can be used in court if necessary.

**Other companies' use of your personal information**

If you choose to share your information with a third party by signing documents using Yoti Sign, those third parties may choose to use that information to communicate with you or they may share that information with others. We advise you to read the privacy notices of any company you share your information with to understand how they will use your personal information.



## **Security**

The information and documents are encrypted and stored in secure locations. We continually test our systems and we follow top industry standards for information security.

Yoti has the decryption keys but we have access controls in place to limit which staff have access to the server. Our staff may need access to troubleshoot problems and manage the server in emergency events.

We currently store your personal information in Amazon Web Services EU data centres.

## **Deleting your information**

If you delete your Yoti Sign account this will delete the Yoti ID and prevent you being able to access your documents stored with Yoti Sign. The documents remain for the document sender and any individuals who signed them.

If you delete your Yoti without setting up the recovery key, you will no longer be able to access Yoti Sign.

We keep the documents for seven years from the date the document was uploaded. Please also see our terms and conditions for more information on this.

## **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.

The information provides us with statistics on things like:

- how many users we have;
- the numbers of documents uploaded, sent and signed;
- aggregate types and numbers of attributes used;
- aggregate time taken at each stage and where users drop out of the process;
- whether we have a lot of unsigned documents across the product or only a few senders with lots of unsigned documents;
- aggregate numbers of emails delivered and opened;
- aggregate time taken at each stage and where users drop out of the process;
- percentage of users who sign after a first reminder, a second reminder and so on.

These statistics are crucial for us to understand how Yoti Sign 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 improvements we need to make.

## **Recovering your account**

We store a recovery key in iCloud or Google Drive so that you can recover access to your account if you lose your phone or reinstall the app.

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 recovery key from iCloud or Google Drive	We retrieve this to restore access 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 seven days after verification.</p>

### Using your Yoti

What we collect	What we do with it
App login details	To log you in to 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>The information you send comes to us by email 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>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. We delete the support tickets after six months.</p> <p>You can also choose to share certain data with us, that we call a Request ID, to help us find the server logs for your phone so that we can identify and fix the issue.</p>

	On the back end, the app associates your server log information with a Request ID (for example, 3bbf6e6fe414b40bf9fed99c8d36bd2c) but we do not connect it to you personally, unless you choose to provide it to our Customer Support as part of getting help as set out in the above paragraph.
Anonymous information that does not identify any specific user about what types of information you have shared with third parties	This information allows us to charge organisations for the information they get from you.  For example, we may charge an organisation more for receiving five pieces of information from you through Yoti, than we would charge an organisation who only received three.
Certain device or user information (such as location, photo)	Some uses of Yoti require us to carry out authentication or fraud prevention checks to make sure that it is really you.

### Yoti website

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

## 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.

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 <a href="mailto:privacy@yoti.com">privacy@yoti.com</a>.</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 address</p>	<p>We will check this information against a third party as part of verifying your identity.</p> <p>In the UK this is Callcredit and 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. For other countries it is Aristotle.</p> <p>If you add your address manually (instead of adding it through an ID document) you can choose whether to get the verification check.</p>
<p>Some companies using Yoti will request an identity check against credit reference agency or other fraud prevention data</p>	<p>If you agree, Yoti will send the relevant details to the credit reference agency or fraud prevention database on behalf of the company, and will send the response back to the company.</p> <p>In the UK this is a check against Callcredit data. 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. For other countries this is a check against Aristotle data.</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</p>

	<p>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 identity providers who we use to help with identity verification</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> <p>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.</p>
<p>If Yoti sells its assets</p>	<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.

Organisations using Yoti can request the source of the information they request from you, such as 'passport', 'driving licence' or 'self-asserted'. This is because some organisations carrying out some types of identity checks are required to evidence where they got the details from.

## **Yoti ID**

When you allow a share, Yoti generates an ID which connects your Yoti to the third-party application / website you are sharing your personal information with. The third party can choose to store this ID along with the personal information they request from you. If they store it, the third party can use this ID to recognise your Yoti when you share with them again, so you can use different features of a third-party application / website without having to keep sharing the same information for each interaction.

For example, if you register with a site using Yoti the third party can use the ID to allow you to log in to the site, prove your age, carry out 'know your customer' due diligence and so on, by only asking for any required additional details, rather than asking you for all your details again. This approach is in line with Yoti's data minimisation principle, meaning you should only share the details relevant to what you are doing.

If a third party you are sharing information with uses the ID and you do not want them to do this, you should contact the third party to delete your account with them. The ID is unique to your Yoti account, and it is different for each third-party application / website you share information with. If you delete your Yoti account you will lose your Yoti ID. If you then set up a new Yoti account you will have a new Yoti ID which will not be recognised by any application / website you previously used with your old Yoti account.

## **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 compliant, which means we follow top industry standards for information security.

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.

Access rights

Correction rights

Deletion rights

Objection rights

Restriction rights

Portability 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 in your account through your Yoti app. If you have contacted our Customer Support or had other contact with us leading to us holding information on you, you can make an access request to: [privacy@yoti.com](mailto:privacy@yoti.com)

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 delete your account and set up a new one. We have several developments underway to improve this. These developments will let you manually add an address, archive old addresses and change your email. We are also working on the ability for you to simply replace an outdated ID document. Yoti only has access to the information in your account for up to seven days after it is first provided to Yoti.

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

If you have contacted our Customer Support or had other contact with us and want to make a correction request, please email: [privacy@yoti.com](mailto:privacy@yoti.com)

### **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](mailto: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](mailto:privacy@yoti.com)

### **Restriction rights**

In certain circumstances you are entitled to ask us to restrict our processing of your personal information.

You can ask us to do this if you dispute the accuracy of your personal information; if our processing is unlawful but you prefer restriction to deletion; if we no longer need the information but you need it for legal reasons; or if you have objected to our processing and we are still dealing with this objection.

If you want to contact us about your restriction rights, please email: [privacy@yoti.com](mailto:privacy@yoti.com)

### **Portability rights**

In certain circumstances you are entitled to receive the personal information you have provided us in a structured, commonly used and machine-readable format.

You can download the information from your Yoti account from the app settings.

If you have contacted our Customer Support or had other contact with us and want to make a portability request, please email: [privacy@yoti.com](mailto: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/>

## **Biometrics**

Biometrics are your unique features, such as your face. We use biometrics in our app to help prevent fraud and to make sure it's actually you using Yoti. Yoti is a biometric identity app, so you can't use the app without this extra security.

When you set up a Yoti account we ask you to consent to our use of your biometrics. You can withdraw this consent at any time in the app settings.

What are biometrics?

Why do biometrics provide more security?

Why does Yoti use biometrics?

What biometrics does Yoti use and why?

What if I change my mind and don't want you to use my biometrics any more?

### **What are biometrics?**

Biometrics is the measurement and analysis of your unique physical characteristics and behaviour, such as your face, your fingerprint, your voice, the way you walk, the way you use your phone and so on.

Using biometrics allows you to prove it's really you by comparing one of these characteristics with a template you have already set up or that has been created for you automatically. The template is created and stored securely and then each time you need to prove that you are really you, your information is compared against the template to see if it matches.

For example, many smartphones allow access using a PIN or your fingerprint. To use your fingerprint you first need to provide it to your phone so it can create a template. Then every time you use your fingerprint to access the phone it compares it to the template and only lets you in when the fingerprints match. This prevents someone else from accessing your phone.

Apps like Yoti can use the phone's fingerprint technology so you can log in to our app using your fingerprint instead of your PIN. We don't collect or store your fingerprint to do this.

### **Why do biometrics provide more security?**

Instead of having to remember PIN numbers, or usernames and passwords (which may be guessed or hacked), biometrics uses something unique to you that only you have, like your face or fingerprint. Many companies, such as banks, are using biometrics like voice recognition to make sure only you can access your account.

### **Why does Yoti use biometrics?**

Yoti is a biometric identity app. It works by allowing you to set up a trusted, genuine and verified digital identity. The biometrics are a key part of making sure we keep out fake identities and documents. The biometrics also make sure that it really is you taking actions in the app. Essentially, all our use of biometrics is to prevent fraudulent use of Yoti and protect your data.

### **What biometrics does Yoti use and why?**

**Photo**

As part of registration we will ask you to take a photo of yourself. From this photo we create a template of the key points on your face. Every time we ask to take another photo to check it's really you we compare the photo against the template to check it matches. For example, we will ask you to take a photo if you want to delete your account, or recover it on a new phone. These checks make sure that only you can take these actions.

### **ID document**

You can also add an ID document to Yoti so that you can share verified identity details like your name, address and date of birth. When you add a document we compare the photo with the face template to make sure users only upload their own documents.

### **Checking you're a real person**

When you add an ID document we will ask you to record a short video of yourself saying a few words. When you take certain actions in the app, such as resetting your PIN, we ask you to move the phone in a particular way. We use the information from these actions to make sure you are a real person. We can't give you any more details about how this works, as we don't want people to be able to get round our checks.

### **Internal research**

As well as preventing fraud in your everyday use of the app, we need to make sure our checks continue to work and that we constantly improve them so we stay ahead of fraudsters and others who might try to provide fake identities or might try to get into your account. We have an internal research team who are constantly testing new ways to prevent fraud, and to do their job they need real biometric data from real people. However, all they have are things like photos, or sections of the video or phone movement measurements. They don't have any information that could identify you personally. We keep information used for R&D purposes for as long as it is relevant to the R&D project.

### **What if I change my mind and don't want you to use my biometrics any more?**

We hope you understand why biometrics are an essential security part of our app, but if you change your mind you can withdraw your agreement at any time by deleting your account in the app settings. There isn't a non-biometric version of Yoti, so without biometrics the app just doesn't work.

## Other GDPR information

The revised EU data protection law - GDPR - (in force from 25 May 2018) requires us to provide you with some extra information that isn't already set out elsewhere in our privacy policy.

Lawful bases

Retention

### Lawful bases

EU data protection law requires an organisation to have a lawful basis for its personal data collection and use, and there are several lawful bases available. We are a global app and so in some cases our choice of EU lawful basis reflects the need to comply with different laws in different countries.

Performance of a contract	<p>When you set up and use our app and associated products and services, almost all the personal data collection and use is necessary to provide the app, product or service.</p> <p>If you provide us your contact details to ask us a question, request more information or contact our Customer Support, we use your details to reply and resolve any issues.</p>
Consent	<p>We ask you to consent to us using your biometrics. This is because biometric data is sensitive data under the EU GDPR and the lawful bases available for this data are very limited. There are also biometrics laws in other countries that require consent.</p> <p>See the section on biometrics for more information about the biometrics we use and why.</p> <p>In the UK we can also use a 'fraud prevention' lawful basis, as our use of biometrics is for fraud prevention purposes.</p>
Legitimate interests	<p>Some personal data collection and use is in our legitimate business interests.</p> <p>Identity checks: where we check your details with a third party to make sure only verified identities can get a Yoti.</p> <p>Fraud reporting: some anti-fraud bodies we work with require us to report identity fraud we discover.</p> <p>R&amp;D: (non-sensitive data) to continually improve and test our fraud prevention measures.</p> <p>Analytics: we de-identify and aggregate the metrics information we get from users to understand how our website and app are performing, to identify bugs, and to identify where we need to focus our efforts to improve.</p> <p>Marketing campaign records: we keep information so we know who was sent what marketing information and when.</p> <p>Invoice and billing: for corporate customers.</p>
Legal obligation	<p>If you have provided us your contact details to hear about Yoti, its products and services and you no longer want to hear from us, we</p>

	<p>are obliged by law to stop contacting you. To meet this legal obligation we will add your details to a suppression list so you no longer hear from us.</p> <p>If you are a corporate customer, we are obliged to carry out some due diligence.</p>
--	---

**Retention**

We provide relevant retention information throughout this privacy notice.

In most cases, the information you add to your account or provide as part of using a product or service remains until you delete the account.

It is important to note that if you delete the app before deleting your account, you just lose the connection to your data, and it remains 'orphaned' in our system. We delete orphaned data after three years.

If you volunteer for user testing, we will keep the related information for six months.

If you provide us with an email address to hear more about Yoti, its products and services, we will keep it for two years from the date of collection. If you unsubscribe we will add you to our suppression list.

Corporate customer information in our business development database:  
After two years of inactivity we will review your details and decide whether it is appropriate to retain or delete the information.

## **Cookies**

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

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](http://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: <a href="https://vwo.com/knowledge/cookies-used-by-vwo/">https://vwo.com/knowledge/cookies-used-by-vwo/</a>

## 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.

What are analytics and why do we use them?

Yoti website analytics

Yoti app analytics

Your choices for 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**

### **Pixels**

These track activity on the website such as when a user completes an activity (for example, clicking through, completing a purchase, completing a web form, downloading the app). We use this to determine which platform users come to Yoti from, to understand what actions users take once they arrive at Yoti, and so we can attribute business leads back to ad campaigns.

For more information, please see:

- Facebook: <https://www.facebook.com/business/help/651294705016616>
- Twitter: <https://business.twitter.com/en/help/campaign-measurement-and-analytics/conversion-tracking-for-websites.html>
- Google Adwords: <https://support.google.com/adwords/answer/1722054?hl=en-GB>
- Taboola: <https://help.taboola.com/hc/en-us/articles/115006587107-Conversion-Tracking-Overview>
- Outbrain (business landing pages): <https://www.outbrain.com/help/advertisers/what-is-outbrain-amplify/>

## **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, and which adverts, 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. Adjust collects information on which ad you clicked on on which site, and whether you installed the app. If you install the app, Adjust also collects information on when certain events happen (such as completing registration, successfully adding an ID document, first use of Yoti Password Manager).

To provide this service, Adjust uses two identifiers which they anonymise using a technology called 'hashing'. One identifier is the Advertising ID that Apple or Android gives your phone (depending on which operating system your phone uses). 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 hashing technology Adjust uses to anonymise these identifiers means that it is not possible for us to identify you individually. Adjust then provide us with a list of Advertising IDs and country location (based on IP address). We filter the Advertising IDs by things like country, iOS or Android users, or events such as 'completed registration'. We then pass relevant hashed Advertising IDs to advertising partners to be able to show our adverts to the right people on their platforms.

We use Adjust with different advertising networks that allow us to show Yoti adverts on these networks. Adjust also pass back the Advertising ID to these networks so they can build 'lookalike marketing models'. This activity is how companies make sure they target their adverts at the right types of users, and users see adverts that are most relevant to their interests. The advertising networks use the Advertising ID and any associated information they have to create groups of people who share similar characteristics. They use these groups to deliver targeted ads. They use the information they have about you to determine which groups you are in, and so which adverts you see.

Yoti uses advertising networks to make sure we only show our adverts to the people who are most likely to be interested in our products and services. The advertising networks also use the Advertising IDs as a suppression list, to make sure they don't show Yoti adverts to people who have already installed the app. See section 2 of Adjust's privacy notice for more information:

[https://www.adjust.com/privacy\\_policy/](https://www.adjust.com/privacy_policy/)

Opt out of Adjust analytics for all apps using their technology:

<https://www.adjust.com/opt-out/>

**You can opt out of Yoti using 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 and its associated

products and services. 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 recovery keys set up,, 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.

### **Your choices for analytics**

You have some control over analytics information collected through settings available in your website browser and on your phone, as well as Yoti app settings.

#### **Website**

You can clear pixels in the same way as cookies by clearing your cache or browsing history and by setting your browser to refuse cookies and pixels.

You can also get more information from the Digital Advertising Alliance and change ad settings using their 'Your Ad Choices' tool here: <http://www.aboutads.info/consumers>

#### **Phone**

Both Android and iOS phones have privacy settings to limit the collection of the Advertising ID.

Apple: <https://support.apple.com/en-gb/HT202074>

Android: <https://support.google.com/ads/answer/2662922?hl=en-GB>

#### **Yoti app**

You can opt out of Adjust and Google Analytics through the in-app settings.

### **Contact us**

Email: [privacy@yoti.com](mailto:privacy@yoti.com); [hello@yoti.com](mailto: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: 14 May 2018

Section	Changes
---------	---------

### Information collection and use

- We have updated and added to this whole section with relevant information on how long we keep different information for.
- Adding information to your Yoti: we have added information about an upcoming feature where you can add certain information to your Yoti manually, rather than through an ID document.
- Recovering your account: we have clarified this section and merged it with the information on if you lose access to your account.
- Yoti Dashboard: we have added information about account features due in the June app release.
- Yoti Sign: this is a new section to explain this new electronic document signing product.

### Information sharing

- When you share your personal information: we have added information about a new feature where an organisation can request the source of the information you provide them.
- When Yoti shares your personal information: we have added information on the optional verification check you can have us do when you add an address manually.

### Your rights

- We have updated this section and added information on two new rights (restriction and portability) you have under the GDPR (EU data protection law update in force from 25 May 2018).

### New sections

- We have added two new sections: on biometrics and on other GDPR information.
- Biometrics: we will ask you to consent to our use of biometrics in the app and this section reflects the in-app information you will see and explains it all.
- Other GDPR information: under the updated law we are required to provide some additional information on lawful bases and retention that was not already elsewhere in the privacy policy.