

MAGIC ACCESS MANAGEMENT LTD – PRIVACY POLICY

Magic Access Management Ltd, a company registered in England and Wales, with company number, 14125786 (**we, us or our**), understands that protecting your personal data is important. This Privacy Policy sets out our commitment to protecting the privacy of personal data provided to us, or otherwise collected by us when providing our re-useable digital identity and identity verifications services (**Services**) or when otherwise interacting with you.

It is important that you read this Privacy Policy together with any other detailed privacy notices we may provide when we are collecting or processing personal data about you so that you understand our privacy practices in relation to your data.

The information we collect

Personal data: is information that relates to an identified or identifiable individual.

As a data controller (including when we are dealing with our clients and visitors on our website), we may collect, use, store and disclose different kinds of personal data about you which we have listed below:

- **Identity Data** including first name, last name, date of birth, gender, photographic identification and images of you.
- **Contact Data** including billing address, email address and telephone numbers.
- **Financial Data** including bank account and payment card details (through our third party payment processor, PayPal)
- **Transaction Data** including details about payments to us from you and other details of products and services you have purchased from us.
- **Technical and Usage Data** including internet protocol (IP) address, your login data, your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour, information about your access and use of our website, including through the use of Internet cookies, your communications with our website, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider.
- **Profile Data** including your password for our Services, profile picture, orders you have made with us, support requests you have made, information you share through our platform, information you have shared with our social media platforms, your interests, preferences, feedback and survey responses.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Professional data** including where you are a worker of ours or applying for a role with us, your professional history such as your previous positions and professional experience.
- **Special Categories of Personal Data** is a special category of personal data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not actively request special categories of data about you, nor do we collect any information about criminal convictions and offences. If at any time we need to collect special categories of data about you, we will only collect it and use it as required or authorised by law.

End User Data

When we act as a data processor and process end user data on behalf of our clients, we may collect, use, store and disclose the end user's identity data, contact data, details of the service they are using with our client, identity verification data (which may require copies of identity documents like a driving licence, passport and/or proof of address) and marketing and communications data, including preferences in relation to receiving marketing from and our third parties. As part of processing end user data for our clients, we may come across special categories of personal data, including information about your race or ethnicity, your religious beliefs, or details about criminal convictions. We will only process such sensitive end user data in accordance with our client's instructions and all applicable laws.

How we collect personal data

We collect personal data in a variety of ways, including:

- **Directly:** We collect personal data which you directly provide to us, including when you sign up to our services, through the ‘contact us’ form on our website or when you request our assistance via email, or over the telephone.
- **Indirectly:** We may collect personal data which you indirectly provide to us while interacting with us, such as when you use our website or platform, in emails, over the telephone and in your online enquiries.
- **From third parties:** We collect personal data from third parties, such as from our clients when they use our Services and provide us with personal data about their end users to benefit from the Services. See the “Cookies” section below for more detail on the use of cookies.
- **From publicly available sources:** We collect personal data from publicly available resources such as Companies House and professional networking sites such as LinkedIn.

Purposes and legal bases for processing

We collect and process personal data about you only where we have legal bases for doing so under applicable laws. We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please reach out to us if you need further details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose of use / disclosure	Type of Data	Legal Basis for processing
To enable our clients to access and use our Services, including to provide our clients with a login to our software.	<ul style="list-style-type: none"> • Identity Data • Contact Data 	<ul style="list-style-type: none"> • Performance of a contract with our client
Where our clients make available our Services to their end users (e.g. they integrate our identity verification product into their platform), to verify the end user’s identity and/or create their digital identity, to provide our Service to our client.	<ul style="list-style-type: none"> • End User Data 	<ul style="list-style-type: none"> • Performance of a contract with our client
To contact and communicate with our clients about our Services, including in response to any support requests you lodge with us or other enquiries you make with us.	<ul style="list-style-type: none"> • Identity Data • Contact Data • Profile Data 	<ul style="list-style-type: none"> • Performance of a contract with our client
To contact and communicate with you about any enquiries you make with us via our website.	<ul style="list-style-type: none"> • Identity Data • Contact Data 	<ul style="list-style-type: none"> • Legitimate interests: to ensure we provide the best client experience we can offer by answering all of your questions
For internal record keeping, administrative, invoicing and billing purposes.	<ul style="list-style-type: none"> • Identity Data • Contact Data • Financial Data • Transaction Data 	<ul style="list-style-type: none"> • Performance of a contract with our clients • To comply with a legal obligation • Legitimate interests: to recover debts due to us and ensure we can notify you about changes to our

		terms and conditions and any other administrative points
For analytics including profiling on our website, market research and business development, including to operate and improve our Services, associated applications and associated social media platforms.	<ul style="list-style-type: none"> • Profile Data • Technical and usage Data 	<ul style="list-style-type: none"> • Legitimate interests: to keep our website updated and relevant, to develop our business, improve our Services and to inform our marketing strategy
For advertising and marketing to our clients and prospective clients, including to send you promotional information about our events and experiences and information that we consider may be of interest to you.	<ul style="list-style-type: none"> • Identity Data • Contact Data • Technical and usage Data • Profile Data • Marketing and communications Data 	<ul style="list-style-type: none"> • Legitimate interests: to develop our Services and grow our business
For advertising and marketing to end users of our clients, using zero-knowledge marketing, to promote events, services, products, experiences and information that we consider may be of interest to them.	<ul style="list-style-type: none"> • End User Data 	<ul style="list-style-type: none"> • Consent
If you have applied to work with us; to consider your application.	<ul style="list-style-type: none"> • Identity Data • Contact Data • Professional Data 	<ul style="list-style-type: none"> • Legitimate interests: to consider your employment application
To comply with our legal obligations or if otherwise required or authorised by law.	<ul style="list-style-type: none"> • All relevant Personal Data 	<ul style="list-style-type: none"> • To comply with a legal obligation

If you have consented to our use of data about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your data because we or a third party have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using our services. Further information about your rights is available below.

Our disclosures of personal data to third parties

We may disclose personal data to:

- our employees, contractors and/or related entities;
- Onfido, our identity verification service provider;
- IT service providers, data storage, web-hosting and server providers such as Microsoft Corporation;
- marketing or advertising providers such as Meta, Google;
- professional advisors, bankers, auditors, our insurers and insurance brokers;
- payment systems operators such as PayPal;
- our existing or potential agents or business partners;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;

- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights; [and]
- third parties to collect and process data, such as Google Analytics (To find out how Google uses data when you use third party websites or applications, please see www.google.com/policies/privacy/partners/ or any other URL Google may use from time to time) and Facebook Pixel; and
- any other third parties as required or permitted by law, such as where we receive a summons.

Google Analytics: We have enabled Google Analytics Advertising Features including Remarketing Features, Advertising Reporting Features, Demographics and Interest Reports, Store Visits, Google Display Network Impression reporting etc. We and third-party vendors use first-party cookies (such as the Google Analytics cookie) or other first-party identifiers, and third-party cookies (such as Google advertising cookies) or other third-party identifiers together.

You can opt-out of Google Analytics Advertising Features including using a Google Analytics Opt-out Browser add-on found [here](#). To opt-out of personalised ad delivery on the Google content network, please visit Google's Ads Preferences Manager [here](#) or if you wish to opt-out permanently even when all cookies are deleted from your browser you can install their plugin [here](#). To opt out of interest-based ads on mobile devices, please follow these instructions for your mobile device: On android open the Google Settings app on your device and select "ads" to control the settings. On iOS devices with iOS 6 and above use Apple's advertising identifier. To learn more about limiting ad tracking using this identifier, visit the settings menu on your device.

Overseas transfers

Where we disclose personal data to the third parties listed above, these third parties may store, transfer or access personal data outside of the United Kingdom including EU countries, and United States. The level of data protection in countries outside of the United Kingdom may be less comprehensive than what is offered in the United Kingdom. Where we transfer your personal data outside of the United Kingdom, we will perform those transfers using appropriate safeguards in accordance with the requirements of applicable data protection laws and we will protect the transferred personal data in accordance with this Privacy Policy. This includes:

- only transferring your personal data to countries that have been deemed by applicable data protection laws to provide an adequate level of protection for personal data; or
- including standard contractual clauses in our agreements with third parties that are overseas.

Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Your rights and controlling your personal data

Your choice: Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect our ability to provide our Services to you and your use of our Services.

Information from third parties: If we receive personal data about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal data about somebody else, you represent and warrant that you have such person's consent to provide the personal data to us.

Access, correction, processing and portability: You may request details of the personal data that we hold about you and how we process it (commonly known as a "data subject request"). You may also have a right in accordance with applicable data protection law to have your personal data rectified or deleted, to restrict our processing of that information, to object to decisions being made based on automated processing where the decision will produce a legal effect or a similarly

significant effect on you, to stop unauthorised transfers of your personal data to a third party and, in some circumstances, to have personal data relating to you transferred to you or another organisation.

Unsubscribe: To unsubscribe from our e-mail database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

Withdraw consent: Where we are relying on consent to process your personal data, you have the right to withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Complaints: If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint. You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Storage and security

We are committed to ensuring that the personal data we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal data and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

While we are committed to security, we cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

Cookies

We may use cookies on our website from time to time. Cookies are text files placed in your computer's browser to store your preferences. For more information about the cookies we use, please see <https://accessmagic.io/cookie-policy>.

Links to other websites

Our website may contain links to other party's websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal data which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

Amendments

We may change this Privacy Policy from time to time. We will notify you if we make a significant change to this Privacy Policy, by contacting you through the contact details you have provided to us and by publishing an updated version on our website.

For any questions or notices, please contact us at:

Magic Access Management Ltd, a company registered in England and Wales, with company number, 14125786.

Email: privacy@accesssmagic.io

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