

Privacy Policy

Last Modified: 1 March 2018

1. INTRODUCTION

- 1.1 The website at www.ageid.com and the age verification universal login we offer (together or individually known as the "**Platform**") are owned and operated by Colbette II Limited ("**AgeID**", "**we**", "**us**" or "**our**"). We are registered in Cyprus and our registered office is at 195-197 Old Nicosia-Limassol Road, Block 1 Dali Industrial Zone, 2540, Cyprus. For the purposes of the Data Protection Act 1998, we are the data controller.
- 1.2 This Privacy Policy (together with our [terms of use](#) and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.
- 1.3 We respect your privacy and are committed to protecting it through our compliance with applicable privacy and data protection laws and regulations. Please read this privacy policy carefully to understand our policies and practices regarding your information and how we will treat it. By using our Platform, you are accepting the practices described in this privacy policy. If you do not want your information to be processed as set out in this privacy policy, please do not provide any personal data to us and do not use the Platform.
- 1.4 If you have any questions about our privacy practices, please refer to the end of this privacy policy for information on how to contact us.

2. WHEN THIS PRIVACY POLICY APPLIES

- 2.1 This privacy policy applies to information we collect:
- 2.1.1 on the Platform; or
 - 2.1.2 in e-mail and other communications between you and the Platform.
- 2.2 It does not apply to information collected by:
- 2.2.1 any other website operated by us (or our affiliates and group companies)
 - 2.2.2 any website operated by a third party including those on which AgeID login tool is used; or
 - 2.2.3 any application or content (including advertising) that may link to or be accessible from or on the Platform.
- 2.3 We strongly recommend that you review the privacy policies of any website which you use AgeID to log into before using them or providing them with any personal information.

3. WHO THIS PRIVACY POLICY APPLIES TO

- 3.1 This privacy policy applies to anyone who visits or uses our Platform. The personal information that we collect about our users depends on what type of user they are.
- 3.1.1 Our "**Personal Users**" are individuals who create an account with us in order to have their age verified so they are able to access age restricted content.

3.1.2 Our "**Business Users**" are businesses operating websites which includes age restricted content and who request our age confirmation services.

3.2 The phrase "Users" shall mean anyone who visits or uses the Platform and includes Personal Users and Business Users.

4. **WHY DO WE COLLECT INFORMATION?**

4.1 We collect information in order to provide an age verification service to operators of websites that contain content which is only suitable for adults. The Digital Economy Act 2017 requires website operators to verify a person's age before allowing them access rights to certain websites and/or certain types of content shown on websites.

4.2 If you would like to have your age verified by us, we will require certain personal information from you so that this can be checked with a third party who is then able to confirm your age to us. Once a Personal User's age has been verified, they will be granted a "**Universal Login**" which they will be able to use to access websites operated by Business Users.

5. **INFORMATION WE COLLECT AND HOW WE COLLECT IT**

5.1 We only collect a limited amount of information by which Users may be personally identified ("**personal information**"). We do not collect personal information about Personal Users' visits to the Business Users' websites (or particular content on those websites).

5.2 When you access our website from a mobile device like a tablet or phone, we receive information about your approximate location from your IP address, information about your device, including one or more unique identifiers for your device, and your mobile carrier.

5.3 Information collected automatically:

5.3.1 *Information about your computer and internet connection.* This includes your internet protocol address ("**IP address**"), your country of location (so we know which version of the website to display), operating system and browser and platform type (e.g., a Firefox browser on a Macintosh platform) and language, access times and the content of any undeleted cookies that your browser previously accepted from us.

5.3.2 *Information provided by cookies (or browser cookies).* Cookies are small text files that are stored in your web browser or downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie, and allow a website to recognise a user's device.

We currently use the following types of cookies:

Cookie	Reason/Purpose	Duration/T ype
Age ID cookie	This cookie is used for Users which are registered and logged in and assists in tracking this information. It does not store the email address or password of the User.	Persistent cookie

Load cookie	Balancer	This cookie tells the device which server to connect to based on the load.	Session cookie
Google cookies	Analytics	<p>We use two google analytics cookies which contain information regarding their device if the User has chosen to share it with Google Analytics.</p> <p>Google Analytics is a web analytics service provided by Google, Inc. which uses cookies to collect information about how visitors use our site. We use this information to compile reports and to help us improve our site. Google holds this information and provides us with access to it.</p> <p>Find out more about Google Analytics at: https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage. Read the Google Analytics privacy policy at: https://www.google.co.uk/policies/privacy/. You can find out how to opt out of being tracked by Google Analytics by visiting https://tools.google.com/dlpage/gaoptout.</p>	Various lengths

5.3.3 We do not require that you accept cookies and you may withdraw your consent to our use of cookies at any time by adjusting your browser's privacy settings. However, if you decline to accept cookies, some functionality on our Platform may be disabled (e.g. you may have to log in more frequently) and you may be unable to access certain parts of our Platform. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Platform. Cookies can be either session cookies or persistent cookies. A session cookie expires automatically when you close your browser. A persistent cookie will remain until it expires or you delete your cookies. Expiration dates are set in the cookies themselves; some may expire after a few minutes while others may expire after many years.

5.3.4 *Information provided by device identifiers.* When you use a mobile device like a tablet or phone to access our Platform, we may access, collect, monitor, store on your device, or remotely store one or more "device identifiers". Device identifiers are small data files or similar data structures stored on or associated with your mobile device. A device identifier may be data stored in connection with the your carrier, browser, device hardware, data stored in connection with the device's operating system or other software, or data sent to the device by the Platform. It does not identify the specific device. Some features of the Platform may not function properly if use or availability of device identifiers is impaired or disabled.

5.4 We also may receive confirmation that you are at least 18 years old from age verification providers (e.g. credit card providers and telephone providers).

5.5 In respect of Business Users only, we will collect financial information you provide to invoice you for the services we provide and to process any payments you make to us.

6. PURPOSES FOR WHICH WE USE YOUR PERSONAL INFORMATION

6.1 We use information that we collect about you or that you provide to us for following purposes:

6.1.1 **Age verification:** to assist in confirming that a third party has verified that you are at least 18 years old and are allowed to access age restricted content;

6.1.2 **Provision of services:** to present our Platform and its contents to you and to provide you with information or services that you request from us;

6.1.3 **Customer management:** to manage your account, to provide you with customer support and with notices about your account, including expiration and renewal notices, and notices about changes to our Platform or any services we offer or provide through it;

6.1.4 **Functionality and security:** to diagnose or fix technology problems, and to detect, prevent, and respond to actual or potential fraud, illegal activities, or intellectual property infringement;

6.1.5 **Compliance:** to enforce our terms and conditions and to comply with our legal obligations;

6.1.6 **Consent:** for any other purpose with your consent provided separately from this privacy policy; and

6.1.7 **As informed:** in any other way we outline when you provide information to us.

7. DISCLOSURE OF YOUR PERSONAL INFORMATION

7.1 We understand that your personal information is important and we therefore want you to understand the circumstances in which we disclose it as well as other information we have collected about you or your activities on the Platform. We do not share your personal information with third parties except as indicated below:

7.1.1 To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganisation, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by us about our Users is among the assets transferred. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this privacy policy.

7.1.2 In response to a summons or similar investigative demand, a court order or other judicial or administrative order, or a request for cooperation from a law enforcement or other government agency; to establish or exercise our legal rights; to defend against legal claims; to comply with applicable law or cooperate with law enforcement, government or regulatory agencies; or to enforce our Platform terms and conditions or other agreements or policies; or as otherwise required by law (including responding to any government or

regulatory request). In such cases, we may raise or waive any legal objection or right available to us, in our sole discretion.

7.1.3 To the extent a disclosure is necessary in connection with efforts to investigate, prevent, report or take other action regarding illegal activity, suspected fraud or other wrongdoing; to protect and defend the rights, property or safety of our company, our Users, our employees, or others; to maintain and protect the security and integrity of our Platform or infrastructure.

7.1.4 To the extent this is necessary to fulfil any other purpose not mentioned above for which you provided personal information and, if applicable, your consent separately from this privacy policy.

7.2 We may disclose aggregated information about our users, and information that does not identify any individual, without restriction. In particular, we may transfer non-personal information and process it outside your country of residence, wherever the Platform, its affiliates and service providers operate. We may combine non-personal information we collect with additional non-personal information collected from other sources.

8. **FINANCIAL INFORMATION**

8.1 We do not routinely process Personal Users' financial information.

8.2 We do process Business Users' financial information (including personal information) regularly. We will only share such financial information with our third party processors in order to initiate and complete any orders placed on your account. All credit card transactions are processed with industry standard encryption through third party processors who only use your financial information and personal information for that purpose. All financial data and related personal information will not be shared by us with third parties except with your authorisation or when necessary to carry out all and any transactions requested by you with the understanding that such transactions may be subject to rules, terms, conditions and policies of a third party. All such information provided to a third party is subject to their terms and conditions.

9. **HOW WE STORE YOUR PERSONAL INFORMATION**

9.1 The information that we collect about you, including personal information, will be stored and processed in the countries in which we and our third parties service providers maintain facilities. Please note that we transfer personal information of our Business Users to Canada for billing purposes which does not provide the exact same level of protection as within the European Economic Area. We do not transfer any personal information relating to our Personal Users outside of the European Economic Area. All data relating to Users is stored on servers in Amsterdam and is not replicated anywhere else.

9.2 By using the Platform you consent to the transfer of information that we collect about you, including personal information, to any country in which we, our affiliates or service providers maintain facilities and the use and disclosure of information about you as described in this privacy policy.

10. **RETENTION OF PERSONAL INFORMATION**

- 10.1 To the extent we have collected your personal information for purposes of provision of services and customer management, we keep it for as long as you have an account with the Platform, and as needed to provide you with our respective services.
- 10.2 If you delete your Universal Login, or it is closed for any reason, we retain your information to the extent this should be necessary to comply with have legal, auditing or account obligations or it is in our archive system. Where possible, your personal information will be anonymised.
- 10.3 Personal information used for functionality and security purposes will be stored as long as necessary to ensure the proper operation and the security of our Platform and services.
- 10.4 The period for which we keep your personal information that is necessary for compliance and legal enforcement purposes varies and depend on the nature of our legal obligations and claims in the individual case.

11. **HOW WE PROTECT YOUR PERSONAL INFORMATION**

- 11.1 We take appropriate security measures (including physical, electronic and procedural measures) to safeguard your personal information from unauthorised access and disclosure. For example, only authorised employees are permitted to access personal information, and they may do so only for permitted business functions. In addition, we use encryption in the transmission of your personal information between your system and ours, and we use firewalls to help prevent unauthorised persons from gaining access to your personal information.
- 11.2 The safety and security of your personal information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Platform, you are responsible for keeping this password confidential. You must not to share your password with anyone. We are not responsible for circumventions of any privacy settings or security measures contained on the Platform.

12. **CHOICES ABOUT HOW WE COLLECT, USE AND DISCLOSE YOUR PERSONAL INFORMATION**

- 12.1 We have outlined below some of your choices regarding the personal information you provide to us.
- 12.2 You can choose not to provide us with certain personal information, but that may result in you being unable to use certain features of our Platform because such information may be required in order for you to register as a User; pass verification procedures; login via the Universal Login; access third-party websites; purchase or request our services; ask a question; or initiate other transactions on our Platform.
- 12.3 You may at any time, update, correct or delete certain personal information that you have provided to us by contacting us at the email address provided at section 19.
- 12.4 You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of the Platform may then be inaccessible or not function properly.

12.5 You may delete your Universal Login at any time. If you do so, your personal information and any and all other account related information including, but not limited to, user profile data, sharing data and any other data, or content specifically associated with your account will no longer be accessible by you. After deleting your Universal Login, if you want to create a new account, you will have to sign up again as none of the information you previously provided or saved within your account will have been saved. Please note that you will have to pass the age verification procedures again in order to be granted a new Universal Login.

13. **YOUR RIGHTS RELATED TO YOUR PERSONAL INFORMATION**

In accordance with the Data Protection Act 1998 you have the right to access any personal data that we hold relating to you. Please note that we reserve the right to charge a fee of GBP 10.00 to cover costs incurred by us in providing you with the information. If you would like a copy of this information, please write to us at section 19.

14. **CHANGES TO OUR PRIVACY POLICY**

14.1 We may modify or revise our privacy policy from time to time. Although we may attempt to notify you when major changes are made to this privacy policy, you are expected to periodically review the most up-to-date version found at https://cdn1.ageid.com/misc/privacypolicy_en.pdf, so you are aware of any changes.

14.2 If we change anything in our privacy policy, the date of change will be reflected in the "last modified date". You agree that you will periodically review this privacy policy and refresh the page when doing so. You agree to note the date of the last revision to our privacy policy. If the "last modified" date is unchanged from the last time you reviewed our privacy policy, then it is unchanged. If the date has changed that means that there have been changes. In these circumstances you agree to re-review our privacy policy and your continued use of our Platform confirms your acceptance of the revised terms.

14.3 All changes are effective immediately and apply to all access to and use of the Platform thereafter. The updated version of our privacy policy supersedes any prior versions immediately upon being posted.

15. **COMPLAINTS PROCEDURE**

We regularly review our compliance with this privacy policy. Please feel free to direct any questions or concerns regarding this privacy policy or our treatment of personal information by contacting us at support@ageid.com. When we receive a formal written complaint, it is our policy to contact the complaining party regarding his or her concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the collection, use and disclosure of personal information that cannot be resolved by an individual and us.

16. **NO RIGHTS OF THIRD PARTIES**

This privacy policy does not create rights enforceable by third parties.

17. **NO CHILDREN**

Our Platform is not intended for use by persons under the age of 18 and we do not intentionally collect personal information from children. If you become aware that your child has provided us with personal information, please contact us at support@ageid.com.

If we become aware that a child has provided us with personal information, we will take steps to remove such information and terminate that person's account. We delete the personal information of anyone who our age verification procedures suggest is under 18 years of age.

18. NO ERROR FREE PERFORMANCE

We do not guarantee error-free performance under this privacy policy. We will use reasonable efforts to comply with this privacy policy and will take prompt corrective action when we learn of any failure to comply with our privacy policy.

19. CONTACT INFORMATION

19.1 If you have any questions about this privacy policy or our information-handling practices, please contact us at support@ageid.com.

19.2 You may also write to us at Colbette II Limited, 195-197 Old Nicosia-Limassol Road, Block 1 Dali Industrial Zone, Cyprus 2540, telephone us on [+357 22662 320](tel:+35722662320) or fax us on +357 22343 282.