

Personal data processed by Onfido and list of third-party service providers with whom Onfido may share personal data1

Onfido processes personal data to provide and develop its services and in so doing, also shares information relating to end users with third party service providers who support Onfido's services, as described in the Onfido Privacy Policy. The below list:

1. SERVICES

A. Document Check / Document Check - Video

Purpose: Assesses the likelihood the identity document provided is genuine and, if applicable, cross-references information within the identity document.

Personal Data Processed: Image/video of the identity document and information describing the identity document including information extracted from the document.

¹ Document drafted by Ecofinance IFN SA based on Onfido GmBH document *Personal data processed by Onfido and list of third-party service providers with whom Onfido may share personal data* version 13, dated 31.01.2024. The responsability for updating this info and for the accuracy of data provided within falls under sole responsability of Onfido GmBH. More info can be find here https://onfido.com/privacy/

1. Melissa Data Ltd Note - this service can be deactivated upon request to keep data within a specified region. This will cause data to go to manual extraction. Category: •	London, U.K.	No data is stored in long term storage, but the service may ping servers in the following location for a response: France U.K Ireland Australia United States Canada Note - All personal data originating in Europe is processed within the EEA.	EU Standard Contractual Clauses and UK Addendum.	Melissa Privacy Policy	Address parsing service, dependent upon client configuration.	Address and postcode.	Not applicable - Melissa Data does not store any data.
TrustID Ltd (providing access to Amberhill - Metropolitan Police)	Reading, U.K.	U.K.	Not applicable - The data recipient is located in the UK. Any onward transfers of personal data	Trust ID Privacy Policy	To check whether an identity document has been flagged as fraudulent by the UK Metropolitan Police.	 Identity document number and type (to check the database). Image of the identity document (where Onfido is obliged to share a 	No data is retained by TrustID, but the Metropolitan Police may retain data in accordance with their own policies and procedures. For
Note - this service may be activated / deactivated by each client. Category: •			out of the EEA must comply with applicable data protection law.			fraudulent identity document).	more information, see the <u>UK</u> <u>Metropolitan Police</u> <u>Amberhill Service</u>

3. Mas Callnet India Pvt. Ltd. Note - The service may be configured to only use BPOs located in specific regions. Category: •	New Delhi, India	Same as AWS storage location (ie dependent upon client configuration) - see below. Note - Mas Callnet uses a Zero Trust Browser (ZTB) to access an Onfido provided environment (hosted by AWS) from its service centre in India, and consequently, does not store data on any Mas Callnet controlled servers.	EU Standard Contractual Clauses and UK Addendum.	Available upon request.	To provide human review, where necessary as part of business continuity.	•	Image/video of the identity document and information describing the identity document.	Not applicable - Mas Callnet does not store any data.
4. Teleperformance Global Services Private Limited Note - The service may be configured to only use BPOs located in specific regions. Category: •	Mumbai, India	Same as AWS storage location (ie dependent upon client configuration) - see below. Note - Teleperformance uses a Zero Trust Browser (ZTB) to access an Onfido provided environment (hosted by AWS) from its service centre in India, and consequently, does not store data on	EU Standard Contractual Clauses and UK Addendum.	Teleperformance Security	To provide human review, where necessary as part of business continuity.	•	Image/video of the identity document and information describing the identity document.	Not applicable - Teleperformance does not store any data.
		controlled servers.						2

5. Concentrix CX UK Limited Note - The service may be configured to only use BPOs located in specific regions. Category: •	London U.K.	Same as AWS storage location (i.e. dependent upon client configuration) - see below. Note - Concentrix uses a Zero Trust Browser (ZTB) to access an Onfido provided environment (hosted by AWS) from its service centres in India, Vietnam and/or Bulgaria, and consequently, does	EU Standard Contractual Clauses and UK Addendum.	Concentrix Privacy Policy	To provide human review, where necessary, and dependant upon client configuration.	•	Image/video of the identity document and information describing the identity document.	Not applicable - Concentrix does not store any data.
		not store data on any Concentrix controlled						
6. WNS Global Services (UK) Limited Note - The service may be	London, U.K.	servers. Same as AWS storage location (ie dependant upon client configuration) - see below.	EU Standard Contractual Clauses and UK Addendum.	WNS Privacy Policy	To provide human review, where necessary, and dependant upon client configuration.	•	Image/video of the identity document and information describing the identity document.	Not applicable - WNS does not store any data.
configured to only use BPOs located in specific regions.		Note - WNS uses a Zero Trust Browser (ZTB) to access an						
Category: •		Onfido provided environment (hosted by AWS) from its service centres in India and Sri Lanka, and consequently, does not store data on any WNS						
		controlled servers.						



B. Facial Similarity Check

Purpose: Compares the face displayed on an identity document with an image/video of the person claiming ownership of the identity document to verify that they are the same and, for Facial Similarity Check – Video, requires the end user to undergo liveness detection.

Personal data processed: (i) image/video of the end user's face; (ii) image of the face in the identity document; (iii) transcribed text data from the video clip (if applicable); and (iv) numerical biometric data.

7. Microsoft Ireland Operations Limited Note - The following Microsoft regions: • West Europe; • East US; and • Canada- Central are used dependent on client configuration of AWS storage location - see section Onfido Data Storage and Infrastructure below, for default hosting depending on client place of establishment.	Dublin, Ireland.	The following Microsoft regions: • West Europe; • East US; and • Canada- Central are used dependent on client configuration of AWS storage location - see below.	EU Standard Contractual Clauses and UK Addendum.	Overview of Microsoft Azure Compliance	Microsoft Azure Cognitive Services Speech API is used for: Speech to text conversion (video configuration only).	Audio clip. Transcribed text data from the video clip.	Within 24 hours
of establishment. Category:							



8. Concentrix CX UK Limited Note - The service may be configured to only use BPOs located in specific regions. Category: •	London, U.K.	Same as AWS storage location (ie dependant upon client configuration) - see below. Note - Concentrix uses a Zero Trust Browser (ZTB) to access an Onfido provided environment (hosted by AWS) from its	EU Standard Contractual Clauses and UK Addendum.	Concentrix Privacy Policy	To provide human review, where necessary, and dependant upon client configuration or as part of business continuity.	user's • Image	e/video of the end of face. e of the face in the ty document.	Not applicable - Concentrix does not store any data.
		service centres in India, Vietnam and/or Bulgaria, and consequently, does not store data on any Concentrix controlled servers.						
9. Mas Callnet India Pvt. Ltd. Note - The service may be configured to only use BPOs located in specific regions. Category: •	New Delhi, India	Same as AWS storage location (ie dependant upon client configuration) - see below. Note - Mas Callnet uses a Zero Trust Browser (ZTB) to access an Onfido provided environment (hosted by AWS) from its service centre in India, and consequently, does not store data on any Mas Callnet controlled servers.	EU Standard Contractual Clauses and UK Addendum.	Available upon request	To provide human review, where necessary as part of business continuity.	user's • Image	e/video of the end of face. e of the face in the dty document.	Not applicable - Mas Callnet does not store any data.

10. Teleperformance Global Services Private Limited Note - The service may be configured to only use BPOs located in specific regions. Category: ●	Mumbai, India	Same as AWS storage location (ie dependant upon client configuration) - see below. Note - Teleperformance uses a Zero Trust Browser (ZTB) to access an Onfido provided environment (hosted by AWS) from its service centre in India, and consequently, does not store data on any Teleperformance controlled servers.	EU Standard Contractual Clauses and UK Addendum.	Teleperformance Security	To provide human review, where necessary as part of business continuity.	•	Image/video of the end user's face. Image of the face in the identity document.	Not applicable - Teleperformance does not store any data.
11. WNS Global Services (UK) Limited Note - The service may be configured to only use BPOs located in specific regions. Category: •	London, U.K.	Same as AWS storage location (ie dependant upon client configuration) - see below. Note - WNS uses a Zero Trust Browser (ZTB) to access an Onfido provided environment (hosted by AWS) from its service centres in India and/or Sri Lanka, and consequently, does not store data on any WNS controlled servers.	EU Standard Contractual Clauses and UK Addendum.	WNS Privacy Policy	To provide human review, where necessary, and dependant upon client configuration.	•	Image/video of the end user's face. Image of the face in the identity document.	Not applicable - WNS does not store any data.



C. ETSI Certified IDV Package

Purpose: To provide Clients with an ETSI Certified package of products (Document Check / Document Check - Video, Motion, Known Faces and Device Intelligence).

Personal data processed: Refer to above sections for the personal data processed for the products making up the ETSI Certified IDV package (Document Check / Document Check - Video, Motion, Known Faces and Device Intelligence)

12. <u>Namirial SpA</u> Italy Category: ● 08.12.2023	Italy Ireland	Not applicable - The data recipient is located in the EEA.	Namirial TSP Documentation	To provide a sealed evidence file for the purposes of ETSI compliance.	listed products to seal the	Not applicable - Namirial does not store any data.
					evidence file.	

2. DATA COLLECTION METHODS

A. Software Development Kit (SDK)

Purpose: To provide clients with a drop-in set of end user interface screens for mobile (iOS, Android, and web) and web applications to allow the capture of identity documents and facial photographs/video for the purpose of services.

Personal data processed: (i) images/video and information describing the image/video including information extracted from the image/video; (ii) telephone number (web SDK only and optional); (iii) content of SMS (web SDK only and optional); (iv) IP address and associated city/country level location information; (v) technical device metadata for SDK performance and fraud detection; (vi) anonymised usage data; and (vii) Onfido User unique identifier.

13. <u>Twilio Inc.</u>	Delaware,	United States	EU Standard	Twilio Trust &	Web SDK (e.g.,	•	Telephone number.	Within 4 weeks.
	United States		Contractual	<u>Security</u>	desktop, laptop)	•	Content of SMS.	
Note - This functionality			Clauses and UK		end users have the			
may be disabled in the			Addendum.		option of continuing			
web SDK.					the image capture			
C-1					experience on their			
Category: •								

					mobile device (instead of a desktop/laptop). To move to a mobile experience, these users are presented with the option of (i) scanning a QR code; (ii) manually copying a link; and (iii) having a link sent to them via SMS. Only where selected SMS will any data be sent to Twilio.		
14. Woopra, Inc. Note - This service provider is only applicable to clients on a version of the SDK older than V.9.1.0. Category:	Delaware, United States	United States	EU Standard Contractual Clauses and UK Addendum.	Woopra Privacy Policy	SDK analytics used to improve the SDK experience.	IP address. Anonymised usage data.	Only anonymised data is retained for any period of time.

3. SUPPORT SERVICES AND RESEARCH

A. Onfido Data Storage and Infrastructure

Purpose: To store and process data in a cloud environment.

Personal data processed: All data stored by Onfido.

16. Salesforce UK

Limited

U.K.

15. Amazon Web Services (AWS) (Amazon Web Services, Inc. and Amazon Web Services EMEA SARL)	Delaware, United States and Luxembourg	AWS storage is client configurable between an EU, Canada and U.S instances (see API Documentation).	EU Standard Contractual Clauses and UK Addendum.	Amazon Web Services: Overview of Security Processes	Cloud-based hosting, routing, storage and processing services provider for all Onfido environments.	All information processed to provide the applicable services.	Deletion is configurable via the Onfido deletion service. For more information, see here .
Note - The AWS storage region can be configured upon request. Category:		EU primary storage is in Ireland while backup storage is in Germany.					Automated database backups (text data only, no images): backups are generated and destroyed on a rolling 30 days basis Operational and debug logs (text data only, no images): Logs are generated and destroyed on a rolling 60 day basis
circumstances, personal do	o's services as nece ata should not be pr	ocessed by these third po	arty services providers	s).		ring/logging by Onfido. <i>(Note - Un</i> icted; (v) document number; (vi) c	ŕ

end user queries; (vii) error log data; and (viii) information necessary to resolve the specific query (which may include an image of the identity document and information describing the identity

Salesforce Security

Support ticketing

system.

Full name.

Email address.

Telephone number.

Message content.

EU Standard

Contractual

Addendum.

Clauses and UK

document including information extracted from the document and image/video of the end user's face).

Germany

Paris

Within 1 year.

17. Google Cloud EMEA Limited	Dublin, Ireland	Worldwide - Google Cloud Platform locations are recorded <u>here</u> .	EU Standard Contractual Clauses and UK Addendum Or EU - US Data Privacy Framework where applicable.	Google Security Whitepaper	Email services provider (Gmail).		Communications between Onfido, clients and/or end users via Salesforce will also have their data processed by our email provider (Google). This data may include: Full name. Email address. Telephone number. Message content.	Onfido emails are currently deleted on an ad hoc basis.
18. Google Cloud EMEA Limited	Dublin, Ireland	Worldwide - Google Cloud Platform locations are recorded <u>here</u> .	EU Standard Contractual Clauses and UK Addendum. Or EU - US Data Privacy Framework where applicable.	Google Security Whitepaper	Cloud-based hosting, storage and processing services provider (Google Drive).	•	On request of a client, the following data may be recorded in a spreadsheet and shared with the client in encrypted form. Full name. Date of birth. Address. Document number.	Data is deleted manually upon completion of the client request.
19. <u>Datadog Inc</u>	Delaware, United States	United States	EU Standard Contractual Clauses and UK Addendum.	Datadog Security	Real-time application performance monitoring.	•	Data generated from ingesting, parsing, querying and performing analytics on the system infrastructure and services.	Within 15 days.
20. <u>Sentry</u> (Functional Software Inc. t/a)	Delaware, United States	United States	EU Standard Contractual Clauses and UK Addendum.	Sentry Security	Real-time monitoring and notification of application exceptions and errors.	•	Application error log data.	Within 90 days.
21. Zoom Video Communications Inc	Delaware, United States	United States	EU Standard Contractual Clauses and UK Addendum.	Privacy & Security for Zoom Video Communications	To enable collaborative product support and issue resolution.	•	Personal data viewable on a shared screen during an encrypted zoom call.	Not applicable - no data is recorded.

22. Concentrix CX UK Limited Note - The "Flag an Issue" button may be disabled in the Onfido	London, U.K.	Same as AWS storage location (ie dependant upon client configuration) - see above.	EU Standard Contractual Clauses and UK Addendum.	Concentrix Privacy Policy	To review and respond to feedback and queries raised by clients in respect of	 For client requested feedback: Name and contact information of the person raising the query. Content of the query. 	Not applicable - Concentrix does not store any data.
Dashboard upon request. However, Concentrix will continue to be used in respect of specific queries for feedback raised via other support channels. Category: •	London, U.K.	Note - Concentrix uses a Zero Trust Browser (ZTB) to access an Onfido provided environment (hosted by AWS) from its service centre in India and consequently, does not store data on any Concentrix controlled servers. Same as AWS	EU Standard	WNS Privacy Policy	Onfido check results. • Upon request of a client or during trials, to review the results of a sampling of completed checks for quality assurance purposes. Upon request of a	Information necessary to resolve the specific query. For client requested or trial quality assurance purposes: Image of the identity document and information describing the identity document. Image/video of the end user's face. Image of the identity	Not applicable -
Services (UK) Limited Category: •		storage location (ie dependant upon client configuration) - see above. Note - WNS uses a Zero Trust Browser (ZTB) to access an Onfido provided environment (hosted by AWS) from its service centres in India and Sri Lanka, and consequently, does not store data on any WNS controlled servers.	Contractual Clauses and UK Addendum.	THE PROPERTY OF THE PROPERTY O	client or trial purposes, to review the results of a sampling of completed checks for quality assurance purposes.	document and information describing the identity document. Image/video of the end user's face.	WNS does not store any data.

24. Mas Callnet India Pvt. Ltd. Category: ●	New Delhi, India	Same as AWS storage location (ie dependant upon client configuration) - see below. Note - Mas Callnet uses a Zero Trust Browser (ZTB) to access an Onfido provided environment (hosted	EU Standard Contractual Clauses and UK Addendum.	Available upon request.	Upon request of a client or for trials, to review the results of a sampling of completed checks for quality assurance purposes.	•	Image of the identity document and information describing the identity document. Image/video of the end user's face.	Not applicable - Mas Callnet does not store any data.
25. Teleperformance Global Services Private Limited Category: ●	Mumbai, India	by AWS) from its service centre in India, and consequently, does not store data on any Mas Callnet controlled servers. Same as AWS storage location (i.e. dependant upon client configuration) - see below. Note - Teleperformance uses a Zero Trust Browser (ZTB) to access an Onfido provided environment (hosted by AWS) from its service centre in India, and consequently, does not store data on any Teleperformance controlled servers.	EU Standard Contractual Clauses and UK Addendum.	Teleperformance Security	Upon request of a client or for trials, to review the results of a sampling of completed checks for quality assurance purposes.	•	Image of the identity document and information describing the identity document. Image/video of the end user's face.	Not applicable - Teleperformance does not store any data.

C. Business Intelligence

Purpose: To enable the intelligent sorting and aggregation of data processed during the provision of the Services for the purpose of (i) honoring client permissions; (ii) measuring aggregate service performance (e.g., volumes, pass rate %, etc...); (iii) locating the most suitable data for service improvements; (iv) querying records; and (v) managing human analyst capacity and planning.

Personal data processed: Text based personal data collected and generated during the provision of the Services.

26. FiveTran Inc	Delaware, United States	Germany. Belgium.	EU Standard Contractual Clauses and UK Addendum.	FiveTran Security	Enable the integration of external data sources in our data platform. Used to import product support related	Data processed by Salesforce for product support purposes (see above).	Within 24 hours.
					data from Salesforce.		
27. Snowflake Computing Netherlands B.V	Netherlands	EU-Dublin AWS instance	N/A - The data recipient is located in the EEA.	Snowflake Security Addendum	Cloud-based hosting, routing, storage and processing service to enable the intelligent sorting and aggregation of data processed during the provision of Services.	Text based personal data collected and generated during the provision of the Services.	Deletion is configurable via the Onfido deletion service. For more information, see here.

D. Service Developments

Purpose: To develop Onfido's services.

Personal data processed: personal data processed during the provision of the Services which may include (i) image of the identity document and information describing the identity document; (ii) image/video of the end user's face and extracted numerical biometric data; (iii) information on checks and/or workflows being conducted; (iv) labelling information; (v) IP address and data derived from the IP address; and (vi) technical device metadata.

28. Concentrix CX UK Limited Category: ●	London, U.K.	Same as AWS storage location (ie dependant upon client configuration) - see above. Note - Concentrix uses a Zero Trust Browser (ZTB) to access an Onfido provided environment (hosted by AWS) from its service centres in	EU Standard Contractual Clauses and UK Addendum.	Concentrix Privacy Policy	To train the human review specialists to process Onfido checks. To review the results of a sampling of completed checks for quality assurance purposes. To label data for machine learning research purposes. To perform steps in the document	•	Image of the identity document and information describing the identity document. Image/video of the end user's face. Labelling information.	Not applicable - Concentrix does not store any data.
		India, Vietnam and/or Bulgaria, and consequently, does not store data on any Concentrix controlled servers.			automation process (for example data quality control checks, template annotation and			
					other preprocessing steps).			

29. WNS Global Services (UK) Limited Category: ●	London, U.K.	Same as AWS storage location (ie dependant upon client configuration) - see above. Note - WNS uses a Zero Trust Browser (ZTB) to access an Onfido provided environment (hosted by AWS) from its service centres in India and Sri Lanka, and consequently, does not store data on any WNS controlled servers.	EU Standard Contractual Clauses and UK Addendum.	WNS Privacy Policy	To train the human review specialists to process Onfido checks. To review the results of a sampling of completed checks for quality assurance purposes. To label data for machine learning research purposes. To perform steps in the document automation process (for example data quality control checks, template annotation and other preprocessing steps).	Image of the identity document and information describing the identity document. Image/video of the end user's face. Labelling information.	Not applicable - WNS does not store any data.
30. Mas Callnet India Pvt. Ltd. Category: ●	New Delhi, India	Same as AWS storage location (ie dependant upon client configuration) - see below. Note - Mas Callnet uses a Zero Trust Browser (ZTB) to access an Onfido provided environment (hosted by AWS) from its service centre in India, and consequently, does not store data on	EU Standard Contractual Clauses and UK Addendum.	Available upon request	To train the human review specialists to process Onfido checks. To review the results of a sampling of completed checks for quality assurance purposes.	Image of the identity document and information describing the identity document. Image/video of the end user's face. Images of other documents and information provided by the end user to demonstrate an ongoing entitlement to work in the U.K.	Not applicable - Mas Callnet does not store any data.

		any Mas Callnet controlled servers.					
31. Teleperformance Global Services Private Limited Category: ●	Mumbai, India	Same as AWS storage location (ie dependant upon client configuration) - see below. Note - Teleperformance uses a Zero Trust Browser (ZTB) to access an Onfido provided environment (hosted by AWS) from its service centre in India, and consequently, does not store data on any Teleperformance controlled servers.	EU Standard Contractual Clauses and UK Addendum.	Teleperformance Security	To train the human review specialists to process Onfido checks. To review the results of a sampling of completed checks for quality assurance purposes.	Image of the identity document and information describing the identity document. Image/video of the end user's face. Images of other documents and information provided by the end user to demonstrate an ongoing entitlement to work in the U.K.	Not applicable - Teleperformance does not store any data.
32. Zoom Video Communications Inc	Delaware, United States	United States	EU Standard Contractual Clauses and UK Addendum.	Privacy & Security for Zoom Video Communications	To enable collaborative feature testing and support.	Personal data viewable on a shared screen during an encrypted zoom call.	Not applicable - no data is recorded.
33. Google Cloud EMEA Limited	Dublin, Ireland	Worldwide – Google Cloud Platform locations are recorded <u>here</u> .	EU Standard Contractual Clauses and UK Addendum. Or EU - US Data Privacy Framework where applicable.	Google Security Whitepaper	Cloud-based hosting, storage and processing services provider (Google Drive) to enable troubleshooting, performance analysis and improvements, and support.	Personal data processed during the provision of the Services.	Data is deleted manually upon completion of the task.



34. SardineAl Corp	Delaware,	United States	EU Standard	Sardine.Al Privacy	To further develop	IP address.	Data transferred by
	United States		Contractual	<u>Policy</u>	and improve fraud		Onfido is deleted
			Clauses and UK		detection		within 4 months.
			Addendum.		capabilities.		

E. Onfido Group Companies

From time to time, the Onfido Group companies will share data for the purpose of supporting the services, where necessary and as requested by a client. All such transfers are subject to Onfido's intra-group data processing agreements and EU Standard Contractual Clauses where relevant.

Onfido Holdings Ltd (UK)

Onfido Limited (UK)

Onfido Inc. (United States)

Onfido Services India Private Limited (India)

Onfido SAS (France)

Onfido Unipessoal Lda (Portugal)

Onfido PTE LTD (Singapore)

Onfido GmbH (Germany)

Onfido BV (Netherlands)

4. PROFESSIONAL SERVICES, AUDITORS & ADVISORS

A. Professional services, auditors and advisors

Purpose: To provide advisory, auditing and professional services to Onfido.

Personal data processed: All data stored by Onfido.

35. Ernst & Young LLP (EY)	U.K.	United Kingdom	Not applicable – The data recipient is located in the EEA.	EY approach to data protection and information security	Professional services including audit and forensic investigation services.	All information processed to provide the applicable services.	Data is deleted or returned to Onfido upon completion of the task.
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36. <u>Wilson Sonsini</u>	United States	United States	EU Standard	WSGR Privacy Policy	Legal services.	•	All information processed	Data is deleted 5 years
Goodrich & Rosati			Contractual				to provide the applicable	after the completion
			Clauses and UK				services.	of the task.
			Addendum.					