# Privacy Notice

KYCJet — pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (GDPR). Version of 21 September 2026.

## 1. Two different roles, depending on who you are

KYCJet is a remote identity verification service provided by GREM S.R.L. to businesses that must identify their customers, such as banks, payment institutions and their agents.

- **If you are a person being verified** through a link received from a business, the controller of your data is **that business**, not us. We process your data on its behalf as a processor (Article 28 GDPR). The notice that applies to you is that business's notice, shown on the link page before you give your consent. Requests about your data should be addressed to that business; if you send them to us, we forward them without delay.
- **If you visit our website, are a customer, or work for a customer** with an account on the dashboard, we are the controller of your data and process it for the purposes described below.

## 2. Controller

GREM S.R.L. — Via Matteo La Fragola 4, 84135 Salerno (SA), Italy — VAT no. IT06136730659

Certified email (PEC): gremsrls@pec.it — Email: info@gremcompany.com

We have not appointed a data protection officer. For any privacy matter, write to info@gremcompany.com.

## 3. What data we process, why, and on which legal basis

| Data | Purpose | Legal basis | Retention |
|---|---|---|---|
| IP address, date and time, requested page (server logs) | Operation and security of the website | Legitimate interest in security (Art. 6(1)(f)) | 30 days |
| Name, email, password (stored only as a hash), organisation and role of a customer's members | Access to the dashboard, account management | Performance of the contract (Art. 6(1)(b)) | For the term of the contract, then 12 months |
| Customer billing data | Payments and tax obligations | Contract and legal obligations (Art. 6(1)(b) and (c)) | 10 years (Art. 2220 Italian Civil Code) |
| Requests and communications by email | Answering and providing support | Contract or pre-contractual measures (Art. 6(1)(b)) | 24 months from the last communication |
| Log of our staff's actions on verification cases and of instructions received from customers | Demonstrating that data was processed correctly and only on instructions | Accountability and security obligations (Arts. 5(2), 28 and 32) and legitimate interest in the defence of legal claims (Art. 6(1)(f)) | 10 years, consistent with the records they refer to |

The website uses no profiling cookies and no analytics tools: see the Cookie Notice.

## 4. Who receives the data

Providers who process it on our behalf under an Article 28 contract: servers and database (Hetzner Online GmbH, Germany) and service emails (Cloudflare, Inc.).

Payments are handled by Stripe Payments Europe Ltd. (Ireland), which also processes payment data as an independent controller, for its own legal and fraud-prevention obligations, under its own privacy notice.

We do not sell data and do not use it for advertising.

The full list of providers processing the data of verified persons on behalf of our customers is on the *Sub-processors* page.

## 5. Transfers outside the European Union

Data for which we are controller stays in the European Union, with two exceptions: the name and email address of customers' members, sent to Cloudflare, Inc. (United States) to deliver service emails, on the basis of the EU-US Data Privacy Framework (Commission adequacy decision of 10 July 2023); and payment data that Stripe processes as an independent controller under its own privacy notice. The data of verified persons stays in the European Union, with a single exception: the first name and surname sent for anti-money-laundering screening to Dilisense, in Switzerland, a country the European Commission recognises as adequate (Article 45 GDPR). Details are on the *Sub-processors* page.

## 6. Your rights

You may at any time ask us for access to your data, rectification, erasure, restriction of processing, to receive it in a machine-readable format, and object to processing based on legitimate interest (Articles 15-22 GDPR). Write to info@gremcompany.com: we reply within one month.

You also have the right to lodge a complaint with the Italian Data Protection Authority, the Garante per la protezione dei dati personali (www.garanteprivacy.it), or with the supervisory authority of your country of residence.

## 7. Automated decisions

We do not take decisions about you based solely on automated processing. In verifications, which we carry out on behalf of our customers, every refusal is decided by a person, from the customer or, where its plan provides for it, from our staff; an approval can be automatic only if the customer, the controller of that processing, has switched this option on, and in that case the verification page and the customer's notice tell you so.

## 8. Changes

If we change this notice we update the date at the top; if the change affects customers, we notify them by email before it takes effect.