Template notice for the person being verified

Starting text for KYCJet customers. The controller is the customer: this template must be adapted, completed where shown in square brackets and published at the address set in the dashboard settings ("Privacy notice" field). Without that address KYCJet does not generate verification links. Where the text offers two alternatives for who decides, choose the one for your plan: "from our staff" on the Standard plan, where you decide the verifications yourself; "from GREM S.R.L., on our behalf" on the Institutional plan, where a KYCJet operator decides them. Version of 21 September 2026.

Notice on the processing of data for remote identity verification

Pursuant to Articles 13 and 9 of Regulation (EU) 2016/679.

Who processes your data

The controller is **[customer's company name]**, with registered office at [address], [email / certified email][, data protection officer: contact].

For the verification we use GREM S.R.L. (KYCJet service), which processes your data on our behalf as a processor and does not use it for any other purpose.

Why we ask you to verify yourself

Before entering into a business relationship with you, the law requires us to identify you and verify your identity (Italian Legislative Decree 231/2007, Articles 17-19, and Regulation (EU) 2024/1624). Remote verification lets you do this without coming in person.

What data we process

1. **Photographs of your identity document** (electronic identity card or passport) and the data we read from them: surname, given names, date and place of birth, sex, nationality, document number, type and expiry date, tax code.
2. **Data from the document's chip**, if you read it with your phone: the same data, with the signature of the issuing State and the photograph stored in the chip.
3. **An image of your face** captured during a short liveness check, to confirm that a real person is in front of the camera and that it is the person on the document. This is **biometric data** (Article 9 GDPR).
4. **The record of your consent**: the version of the text you accepted, date, time and IP address.
5. **The anti-money-laundering check**: your name and surname are compared against official sanctions, politically exposed persons and criminal proceedings lists.

Legal basis

- Identity verification and retention of identification data are a **legal obligation** (Article 6(1)(c) GDPR; Legislative Decree 231/2007).
- Your face is compared with the document only with your **explicit consent** (Article 9(2)(a) GDPR), given on the screen before you start.

If you do not want to use face recognition

You are not obliged to. You can identify yourself another way: [list the alternatives offered: SPID, qualified electronic signature, in-person identification at …]. Refusing consent has no consequence other than having to use an alternative.

Who receives your data

Besides us and GREM S.R.L., the data is processed by providers working on behalf of GREM under contract:

- **Amazon Web Services** (Ireland): photograph storage, document reading, face comparison, liveness check;
- **Hetzner** (Germany): the servers running the service;
- **Dilisense** (Switzerland): receives only first name and surname, for the list screening.

Your data stays in the European Union. The only exception is your first name and surname, sent for screening to Dilisense in Switzerland, a country the European Commission recognises as providing adequate data protection. The full list is at [address of the KYCJet sub-processors page].

How long

- **Photographs and face image**: at most [30 days], then deleted; earlier if the verification is completed.
- **Identification data and verification outcome**: for [10 years] from the end of your relationship with us, as required by anti-money-laundering law [5 years, for periods starting from 10 July 2027].
- **If you do not complete the verification**: the case closes after 30 days of inactivity, and any data already read is deleted [12 months] later.

Automated decisions

The outcome of the verification is decided by a person [from our staff / from GREM S.R.L., on our behalf]. The automated checks (document reading, face comparison, liveness check) assist the person who decides; they do not decide in their place.

[If you have switched on automatic approval, replace the previous paragraph with this one:] If every check is positive — the document's chip signed by the State that issued it, proof that the chip is not a copy, document not expired, liveness check and face comparison with scores at or above the thresholds we have set, no match on the anti-money-laundering lists — the verification is approved automatically, without review by a person. In every other case a person [from our staff / from GREM S.R.L., on our behalf] decides, and a negative outcome is never automatic. The automated decision is necessary to enter into the relationship you asked us for (Article 22(2)(a) GDPR). You have the right to obtain human intervention, to express your point of view and to contest the decision, by writing to [controller's email].

Your rights

You may ask us for access to your data, rectification, erasure (except for data the law requires us to keep), restriction of processing and portability, and you may **withdraw your consent** at any time, without affecting what was done before the withdrawal (Articles 15-22 GDPR). Write to [controller's email].

You may lodge a complaint with the Italian Data Protection Authority (www.garanteprivacy.it) or with the supervisory authority of your country of residence.