

Multipass Privacy Policy

General Provisions

Welcome our website devoted to the Multipass technology. This website is owned and operated by the Worldwide Digital Identification Association (WDIA). The WDIA values your privacy. This Privacy Policy demonstrates our commitment to ensure privacy and security of personal information that is provided to us or collected by us in the course of our activity. It explains how we may collect, process, use and protect any personal information that we obtain about you through direct contact with you, in connection with your use of this website (“Website”) and your rights in relation to that information.

In this Privacy Policy the terms “WDIA”, “us”, “we” or “our” refer to the Worldwide Digital Identification Association (WDIA) whose head office is located at Nations Business Center, Rue du Pré-de-la-Bichette 1, 1202, Geneva, Switzerland. The terms “you” or “your” refer to the person whose data is collected and processed. The term “Personal Data” means all information relating to an identified or an identifiable person.

Unless we specifically state otherwise, the WDIA is the data controller of the Personal Data we process, and is responsible for ensuring that our treatment of personal data is completely in compliance with data protection laws applicable to us. We do not sell, rent, distribute or otherwise transfer your Personal Data to third parties except with your prior consent or as we are required under the applicable law.

We process personal information in accordance with the Swiss Data Protection Act (DPA) and to the extent applicable the EU General Data Protection Regulation (GDPR).

When accessing our Website or communicating with us via email or other channels you consent to this Privacy Policy.

Please note that our Website includes links to other websites owned and operated by third parties. The WDIA is not associated with these third-party websites and does not review their privacy policies save for the WDIA website at: <https://wdia.org>. We encourage you to familiarise yourself with the privacy policies of any linked website before supplying Personal Data through that website.

Our Purpose

We provide users with the opportunity to take advantage of a unique and highly secure blockchain-based technology of personal data processing enabling the storage of personal data exclusively on a user’s device.

A user can create his/her Multipass – an “extended ID” – and use it to instantly pass identity checks when obtaining various goods and services from providers supporting the Multipass technology without the need for repeated full verification of the user’s identity.

In order to create Multipass a user downloads a special program to his/her device. The program generates the archive Multipass.zip by hashing and encrypting personal data entered by the user without sending the data to any server. This archive with all personal data is stored on the user’s device and remains protected by individual hashes that can be unlocked with a password created by the user.

The holder of Multipass can verify his/her personal data with KYC companies and use the verified Multipass to prove his/her identity within seconds, whether online or in person, when receiving the desired services and goods.

Providers of goods and services, on their part, use a software pack enabling them to receive and process the data of Multipass holders.

We have no access to and do not gather any Personal Data entered by a user into his/her Multipass since all Personal Data is stored on the user’s device and can be transmitted to us only by the user on his/her own will.

Personal Data We Collect

We collect Personal Data that you agree to provide to us. In case you fill in any forms on the Website or provide Personal Data by other means we will always ask for your consent to the transfer of your Personal Data to us and to any third party.

We collect the following information that you may intentionally provide to us: your full name, date of birth, email address, physical address, landline and mobile telephone numbers, your geographic location (country/territory where you are living and/or working), the industry sector in which you work, your bank account details, your job title, role and the name of your employer; your passport number or other national identity card details, information about participation in conferences and seminars, credentials, membership in organisations, professional interests and preferences.

We collect certain information when you visit this Website which is stored in log files on the server. This information includes, among other things, your IP address, your geographic location as indicated by your IP address, the content you access, the website from which the request originates, the search terms you enter on this Website, information about the type of device you use to access this Website, the operating system and your browser type.

The WDIA takes measures to ensure that this usage data is not linked to your personal information. We use this information to understand the way this Website is used and identify any possible technical issues users may have with it across multiple devices. Collection of this data helps us to ensure stable and effective operation of the Website.

Legal Grounds for Processing of Personal Data

We will process Personal Data to pursue our legitimate interests to communicate with you, respond to your queries, provide services or information to you about our activities and events, to perform any contract with you, to comply with our legal or regulatory obligations, to monitor the use of this Website, and on other grounds established by applicable law.

Cookies and Google Analytics

We use cookies on this Website to collect information about your usage patterns when you browse the Website in order to improve and personalise it for you.

Cookies are small files saved by the web browser on your computer or mobile device when you visit this Website. Cookies may gather data about your IP address, time and duration of your visits, your search settings and your online preferences.

Most of the cookies we use are automatically deleted from your hard disk after the browser session (“session cookies”). We may use cookies in order to save certain information that remain stored on your computer or mobile device and permit its recognition during your next visit to the Website (“persistent cookies”). We may use the following cookies:

- Strictly necessary cookies. These cookies are required for the operation of the Website and include, for instance, cookies that enable you to log into secure areas of the Website. These cookies are session cookies that are deleted after the browser is closed.
- Analytical/performance cookies. These cookies gather information about the number of users of the Website and the way they navigate through it. This helps us to improve the functioning of this Website for you as a user.
- Functionality cookies. These cookies collect and store information about your preferences and the choices you have made (for example, your choice of language or region) and enhance your use of the Website. These cookies are persistent cookies.
- Targeting cookies. These cookies are usually placed by our advertising partners and record information about the pages you have visited and the links you have followed. They are used to

make advertising more relevant to you and your interests and ensure that advertisements are properly displayed. These cookies represent persistent cookies.

You can prevent the installation of cookies and delete the cookies that have been stored at any time by activating the corresponding setting on your browser. At the same time, if you disable or block all cookies you might not be able to access or use certain functions of this Website. To learn more about cookies please visit: www.allaboutcookies.org.

We may use Google Analytics, a web analysis service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Google Analytics uses cookies to analyse your use of the Website. The information generated by the cookie is usually transmitted to a Google server in the United States and stored there. Google will use this data to evaluate your use of the Website, to compile reports about user activities and to provide other services related to the use of the Website and Internet usage. The information may also be transferred by Google LLC to third parties, where this is required by law or where third parties process this data on behalf of Google LLC. At the same time, Google LLC will not combine your IP address with any other data held by Google LLC. More information about the processing of data by Google LLC can be found at: <http://www.google.de/intl/en/policies/privacy>. You can prevent the collection and processing of the information generated by the cookie and relating to your use of the Website by Google by downloading and installing the browser plug-in available at the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>.

Use of Your Personal Data

We may use Personal Data for the following purposes:

- a) to manage our relationship with you, to communicate with you, respond to your inquiries, to send you newsletters, to provide you with information which may be of interest to you, to invite you to events, training programmes, conferences, groups of specific interest;
- b) to run our activities and manage our relationships with our current and potential partners, members, participants, ambassadors, subscribers and other users of our technologies, to conclude agreements with them and to perform our obligations under those agreements, to procure products and services from our suppliers and contractors;
- c) to perform our compliance obligations, to prevent money laundering and fraud, to detect and prevent other criminal offences, to undertake risk management and to comply with other legal requirements which we are subject to;
- d) to ensure the security and effective functioning of the Website, information technology systems, our applications and other platforms we use and to maintain and support the operation and prevent misuse of the above;
- e) to investigate, assert and defend any claims in legal, administrative or regulatory proceedings;
- f) to keep an maintain records, prepare internal reports and carry out research.

We may use Personal Data for other purposes specified at the time of collection.

Sharing of Your Personal Data With Other Parties

We may disclose Personal Data to the following categories of recipients which may be located in Switzerland, the EU or other countries:

- our branch offices;
- our accountants, auditors, lawyers or other consultants providing us with professional advice;
- external suppliers or service providers, including insurance companies and IT services providers;
- banks and financial institutions in connection with invoicing and payments;
- any third party if we are under a duty to disclose Personal Data in order to comply with a legal obligation (for example, with anti-money laundering or sanctions requirements), or to establish or protect the rights, property or safety of the WDIA, our personnel or other persons, or to defend against legal claims;

- any third party in order to comply with a search warrant, a court order or any other request of governmental or regulatory authorities.

Third parties who receive Personal Data from us undertake to ensure adequate security of such Personal Data. We transfer Personal Data to recipients located outside of the EU only if they provide appropriate safeguards for the protection of Personal Data.

Protection And Storage of Personal Data

We acknowledge confidentiality of your Personal Data. We have put in place and maintain appropriate technical and organisational security measures to protect your Personal Data from unauthorised access, and misuse or disclosure, unauthorised modification or unlawful destruction or accidental loss. We restrict the use and access to your Personal Data to those who have an absolute need-to-know to ensure your access to the Website and to communicate with you. Our staff members, partners, and third-party service providers who have access to confidential information are subject to confidentiality obligations. We regularly review our internal policies and procedures to ensure security of our systems, conduct training of staff, implement IT and network security solutions, access controls and restrictions, use encryption of data and take other measures to comply with data protection and security laws.

Cross-Border Transfer of Personal Data

This Website is hosted on the server located in the EU. We transfer Personal Data to countries outside of the European Economic Area subject to the provision of appropriate safeguards for the protection of Personal Data on the basis of standard contract clauses approved by the European Commission, binding corporate rules, codes of conduct or certifications obtained by the recipients (such as self-certification under the Privacy Shield by U.S. based recipients; see <https://www.privacyshield.gov>). When transferring Personal Data we may also rely on exceptions listed in Article 49 of the General Data Protection Regulation.

How Long We Keep Your Personal Data

We will retain your Personal Data for the period of time required for the specific purpose or purposes for which it was collected. We will keep this information for the duration of our relationship with you and for the period necessary for the performance of our contractual obligations. We may be obliged to store Personal Data for a longer time in order to comply with legal and regulatory requirements on retention of information. We may also retain Personal Data for the period during which potential claims can be asserted against us (having regard to relevant statutes of limitations) or insofar as our legitimate interests require further retention. We delete or anonymize Personal Data which is no longer needed.

Your Rights

You have the right to request access to the data that we hold about you and information regarding specific content of the data, the purposes of and the legal basis for the processing, the persons involved in the processing and the recipients to whom the data are disclosed and some other information.

You have the right to request rectification of inaccurate Personal Data.

You are entitled to request that we erase Personal Data that we process about you, save for the circumstances when we are required by applicable law to retain such data or need it to assert and defend against legal claims.

You have the right to request restriction of processing of your Personal Data if you consider that such data is inaccurate or we process it unlawfully or we have no further need to process such data for a particular purpose.

You are also entitled to object to us processing your information in certain circumstances and you can ask us to stop processing your information at any time. We will abide by your request unless we are required by law to keep the information or if the information may be relevant for pursuing or defending against a legal claim.

If you have provided your consent to the collection and processing of your Personal Data for a specific purpose, you have the right to withdraw your consent at any time. We will stop processing your data once we receive notification of withdrawal of your consent for the purposes you originally agreed to, unless we have a legal basis for continuing to process your data for those purposes.

Complaints

If you consider that we have not handled your request to your satisfaction or that our processing of your Personal Data infringes applicable data protection laws you can contact the competent data protection authority in Switzerland - the Federal Data Protection and Information Commissioner. (<http://www.edoeb.admin.ch>).

Amendment

We may modify or amend this Privacy Policy at any time without prior notice. The current version published on the Website applies. In case this Privacy Policy forms part of an agreement with you, we will notify you of any modification or amendment made.

Last update: 15 February 2020