

# BIOMETRIC DATA PRIVACY POLICY

Last Updated: September 3, 2024

THE TERMS OF THIS BIOMETRIC DATA PRIVACY POLICY ARE LEGALLY BINDING.

Payment Pro Logistics LLC (referred to herein as “Payment Labs”, “we”, “our”, or “us”), values and respects your privacy rights and recognizes the importance of protecting your Biometric Data. This Biometric Data Privacy Policy (the “Policy”) explains our practices and provides information on how and why we collect, use, and share your Biometric Data in relation to your use of the Identity Verification Services (the "IDV").

**By using the IDV, you accept and agree to the terms of this Policy and consent to our collection, use, disclosure, retention, and protection of Biometric Data as described herein.**

## 1. DEFINITIONS

1.1 “Biometric Data” means personal data resulting from specific technical processing relating to the physical physiological, or behavioral characteristics of a natural person, which allows or confirms the unique identification of that natural person, such as information regarding facial geometry.

## 2. TYPE OF BIOMETRIC DATA COLLECTED

2.1 Payment Labs’ third-party IDV service provider collects facial images and facial geometry information.

## 3. WHY BIOMETRIC DATA IS COLLECTED

3.1 We use a third-party service provider to collect Biometric Data to verify the identity of end users to prevent fraud and theft. In certain jurisdictions we are also required to collect a photo of a government-issued ID to comply with rules applicable to local tax authorities.

## 4. HOW BIOMETRIC DATA IS COLLECTED

4.1 We use a third-party service provider to provide the IDV. In doing so, said service provider captures a photo of your ID and your face. The service provider then compares the face geometry extracted from the photos of your ID and your face to securely verify your identity.

## 5. HOW BIOMETRIC DATA IS USED AND SHARED

5.1 Our third-party IDV service provider collects your Biometric Data to verify your identity. Our third-party service provider does not use your Biometric Data for any purpose other than to verify your identity. Our service provider does not share your Biometric Data with any other third party. We can view a copy of the photographs of your ID and your face to help process your check-in and comply with our legal recordkeeping requirements. We may access and disclose a copy of your ID to third-parties as necessary to enforce any

contractual terms, as may be required by and in order to enforce applicable laws and regulations, as requested by any judicial process or governmental agency, to protect the safety and lives of people, to protect our rights or property, to prevent fraud and upon its detection, to combat money laundering, and with your consent. We do not have access to your facial geometry data.

## **6. HOW LONG BIOMETRIC DATA IS RETAINED**

6.1 Our IDV service provider deletes your Biometric Data within two weeks after your ID has been verified. Payment Labs may store a copy of your ID for up to two (2) years from your last interaction with Payment Labs. Payment Labs does not otherwise retain any Biometric Data.

6.2 Payment Labs and our IDV service provider implement and maintain reasonable security measures to protect your Biometric Data from unauthorized access, disclosure, alteration, or destruction. These measures may include encryption, access controls, secure storage, and regular security assessments.

## **7. HOW BIOMETRIC DATA IS DELETED**

7.1 Payment Labs' and its IDV service provider permanently erase your Biometric Data at the end of the retention period described above such that it cannot be recovered or reconstructed.

## **8. OTHER TERMS**

8.1 Payment Labs may update or modify this Biometric Data Privacy Policy from time to time. Any changes will be posted on our website, and the "Last Updated Date" at the beginning of this Policy will reflect the date of the most recent revision. This Policy is effective as of the date first set forth above and is subject to change without notice.

8.2 If you have any questions or concerns about this Policy or our handling of biometric information, please contact us at:

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