

DERMALOG

THE BIOMETRICS
INNOVATION LEADER

**MADE IN
GERMANY**

Privacy Policy

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FEHLER! VERWENDEN SIE DIE REGISTERKARTE 'START', UM HEADING 1 DEM TEXT ZUZUWEISEN, DER HIER ANGEZEIGT WERDEN SOLL.

Revision history

Version	Date	Author	Changes
1.0	2018-08-24	DERMALOG	Initial document

Table 1: Revision history

Table of contents

Revision history.....	4
1 Privacy Policy	6
1.1 Introduction.....	6
1.2 Objective.....	6
1.3 Scope and Coverage of the Privacy Policy	6
1.3.1 Personal Scope: Addressees of the Privacy Policy.....	6
1.3.2 Material Scope: The Processing of Personal Data	6
1.4 Data Protection Management at Dermalog	7
1.4.1 Responsibility for Data Processing	7
1.4.2 The Data Security Administrator as Contact Person for Customers and Employees.....	7
1.4.3 Employee Commitments, Access Concepts and Trainings	7
1.4.4 Technical and Organizational Measures.....	7
1.5 Core Principles of Data Collection and processing at Dermalog	8
1.5.1 Legality and Transparency of Data Processing	8
1.5.2 Earmarking, Data Minimization and Data Economy.....	8
1.5.3 Measures to Ensure the Asserted Data Subject Rights.....	8
1.5.4 Accuracy and Up-to-dateness	8
1.6 Contact to the Company Data Security Administrator - Assertion of Data Subject Rights	9
1.7 Requirements for the Processing of Personal Data	10
1.7.1 Agreement to the Data Processing and Retraction	10
1.7.2 Data Processing for Advertising.....	10
1.7.3 Data Processing for Offering Online-services	10
1.7.4 Privacy of Employees.....	10
1.7.5 Processing of Biometric Data	10
1.8 Requirements for the Transmission of Personal Data	11
1.8.1 Internal Transmission of Data within the Company	11
1.8.2 Order Processing	11
1.8.3 Public Offices.....	11
1.9 Review and Revision of this Policy.....	12

1 Privacy Policy

1.1 Introduction

Hamburg-based DERMALOG Identification Systems GmbH is Germany's largest manufacturer of biometric devices and systems and an innovation leader in biometrics. DERMALOG employs a team of scientists working continuously on automated biometric identification systems (ABIS) and automated fingerprint identification systems (AFIS), including the latest fingerprint scanners. Our portfolio is completed by biometric border control systems, ID cards, passports and voting system applications.

1.2 Objective

With this policy, we want to present transparently in which way Dermalog implements the requirements of the GDPR (General Data Protection Regulation) to the company organization in the area of data protection and basic data processing in our business practice.

1.3 Scope and Coverage of the Privacy Policy

1.3.1 Personal Scope: Addressees of the Privacy Policy

This policy is addressed to Dermalog and all subsidiaries. It implements the group-wide data protection standards for the implementation of the requirements of the GDPR and the supplementary requirements of the German Federal Data Protection Act in relevant business processes.

Responsible authority for data processing in the sense of the GDPR is always the enterprise within Dermalog, which decides alone or together with others over the purposes and means of the processing of personal data. In that regard, the companies merged under Dermalog are independent controllers under this privacy policy. In so far as there is a common processing of personal data, as several Dermalog companies jointly determine the means and purpose of the processing. Those companies are "jointly responsible" to affected persons and determine internally who is implementing which obligation from the GDPR, in particular with regard to information obligations and data subjects' rights.

1.3.2 Material Scope: The Processing of Personal Data

This privacy policy applies to the processing of personal data. Processing means - with or without the aid of automated procedures - any process or series of operations related to personal data, such as acquiring, collecting, organizing, structuring, storing, adapting or modifying, reading, querying, using, disclosure by submission, distribution or any other form of provision, reconciliation or linking, restriction, deletion or destruction.

For appropriate constellations in the area of data processing, which is not or not finally stipulated by this policy, the statutory requirements shall additionally apply. In the event of any contradiction between this policy and the applicable data protection law, the statutory law shall take precedence. With regards to the data processes in our online presence under www.dermalog.com the privacy policy on the website provides the necessary information..

1.4 Data Protection Management at Dermalog

In order to implement the statutory provisions, Dermalog maintains an in-house data protection management system with clear responsibilities.

1.4.1 Responsibility for Data Processing

The management of the respective company as an acting body is responsible for the observance of the data protection law in line with this policy and applicable laws.

1.4.2 The Data Security Administrator as Contact Person for Customers and Employees

The Data Protection Officer informs and advises the responsible person in the implementation of the applicable data protection law and the requirements of this directive. From a data protection perspective, he accompanies the introduction or modification of all business processes and randomly checks their data protection compliance in daily use.

By maintaining a processing directory, listing all of Dermalog's data processes including details of processing, purposes, legal basis and technical and organizational measures (TOMs), he has a complete overview of all the data processes taking place in the company.

The Data Protection Officer is available as a contact person for internally and externally affected persons of data processing operations. In this context he exercises information requirements and disclosure obligations and the rights of data subjects (see also under 6).

The Dermalog Data Protection Officer also acts as a contact point for the regulatory authority for all data processing related issues.

1.4.3 Employee Commitments, Access Concepts and Trainings

In their daily work, all employees of Dermalog observe the guiding principles of data collection and data processing set out in section 5 of this policy.

For emerging data protection issues or the implementation of projects with increased privacy relevance, the employees closely coordinate with the Data Protection Officer.

Employees only have access to personal information that is essential to their daily work. This ensures the data access concept developed for our data processing. All employees who come into contact with personal data are bound to confidentiality and integrity in the handling of personal data and participate in regular data protection training.

1.4.4 Technical and Organizational Measures

Our IT security concept includes technical and organizational measures for all data processes in order to continuously ensure a level of protection when processing personal data that is in line with the state of the art and the respective risk, and to minimize risks to the rights and freedom of data subjects. These include, in particular, measures for the pseudonymization and encryption of personal data, for ensuring the integrity, confidentiality, availability, resilience and recoverability of information technology systems and services and the personal data contained therein. The aim of data security and data protection management at Dermalog is to develop technical and organizational standards for minimizing the risks for affected persons already in advance of the start of data processes and to implement these in an early phase in the development of the processes (Privacy by Design, Privacy-by-Default).

The effectiveness of TOMs is regularly reviewed by us.

1.5 Core Principles of Data Collection and processing at Dermalog

In addition to the institutional safeguards of lawful data processing via data protection management, data processing at Dermalog is always guided by the following principles. Their concrete implementation happens at the individual companies and are adapted to the respective data processing process.

1.5.1 Legality and Transparency of Data Processing

Each processing of personal data is based on one or more legal bases. The information necessary for transparent processing of the type, extent and purpose of the data processing and the possibilities of asserting their respective rights are communicated to data subjects in connection with the analysis and / or use of the concerning data. All information and communications / information for the processing of this personal data is made accessible and understandable in clear and simple language. This applies in particular to the information on the identity of the responsible person and the acting bodies, the duration of the storage, the purposes and scope of the processing, the transmission of the data to third parties and other information that ensures fair and transparent processing.

All relevant information is also documented in the always current processing directory. Supervising authorities can consult this processing directory at any time.

1.5.2 Earmarking, Data Minimization and Data Economy

Personal data are principally only be processed for clear, legitimate purposes at the time of acquisition. If the data have to be further processed for another purpose, we obtain the consent of the data subject or check whether another legislation is relevant for further processing and that further processing is a necessary and proportionate measure with regard to the legitimate objectives of further processing. The personal data shall be appropriate and relevant for the purposes they are processed for and not exceed the extent necessary. For this reason Dermalog works with retention periods for personal data within the individual data-relevant business processes, which are limited to the required minimum. Data are blocked or deleted after discontinuation of purposes. Personal data are processed only to the extent and for as long as the purpose of the processing requires the personal reference. Measures of pseudonymization and anonymization are always taken into consideration.

1.5.3 Measures to Ensure the Asserted Data Subject Rights

Affected parties are informed about the risks, regulations, guarantees and rights associated with the processing of personal data and how they can assert their rights. With regard to all data processes, there are differentiated possibilities of consent, withdrawal and contestation with corresponding dialog interfaces. To enforce their interests and rights, the company Data Security Administrator is available as a "Single Point of Contact" for data subjects. In order to ensure a reliable, legally compliant implementation of asserted data subject rights, we standardize the respective procedures and document our activities for granting the data subject rights. Affected parties have the right to object to the use of their data for specific purposes at any time. The substantive justification of this contestation is clarified immediately and the usage of the data is adjusted accordingly.

1.5.4 Accuracy and Up-to-dateness

Dermalog actively ensures that stored information is accurate, complete and up-to-date. In this context, in addition to effectively implementing rectification requests, appropriate measures will be taken to ensure that personal data that is inaccurate or obsolete are promptly erased or corrected. Organizational processes are designed in a way that this happens consistently and up-to-date information finds its way to the relevant bodies.

This applies in particular to data on the basis of which decisions are made and which are of direct relevance to data subjects.

1.6 Contact to the Company Data Security Administrator - Assertion of Data Subject Rights

In addition to the information provided by this policy, data subjects have the option to contact the Data Protection Officer to find out whether their personal data has been processed. If this is the case, they can furthermore request information regarding the circumstances and legal bases of the data processing and which rights they can assert.

Affected parties may at any time request information about the way and circumstances of their data stored, their authorization, deletion, transmission to them or third parties, restriction of processing or object to processing. Dermalog's Data Protection Officer will review all requests and comply with them under applicable law. The person concerned will be informed personally about the procedure and the outcome. The same applies to complaints made on the grounds that Dermalog infringes this policy or the data protection laws by means of data processing. Responses to inquiries received by the supervising authorities are coordinated with the Data Protection Officer.

Contact details of the Data Protection Officer::

E-Mail: [datenschutz\(at\)dermalog.com](mailto:datenschutz(at)dermalog.com)

Telephone: +49-40-413227-320

Every person has the right to file a complaint to a supervisory authority if the person believes that the processing of their personal data violates the General Data Protection Regulation. Please contact the responsible supervisory authority for Dermalog:

Hamburgische Beauftragte für Datenschutz und Informationsfreiheit, Kurt-Schumacher-Allee 4, 20097 Hamburg

1.7 Requirements for the Processing of Personal Data

Dermalog processes personal data, if the concerned person has legally effectively consented to this or applicable law allows it for a certain purpose.

1.7.1 Agreement to the Data Processing and Retraction

It is made clear to the concerned person that his or her agreement is voluntary. We respect that the agreement only applies to such data processing which is required for the considered business process. Before the person declares his or her agreement, Dermalog informs him or her clearly and in detail on the intended purpose of the collection of his or her personal data and their further processing. Depending on practical considerations, we accept the agreement either in writing or electronically

The concerned person can revoke his or her consent at any time and without stating reasons. We point to this when the person declares his or her consent.

1.7.2 Data Processing for Advertising

The use of personal data for marketing purposes is mainly based on explicit consent of the affected person. As far as data result from a business relationship, Dermalog uses them for the major purpose of customer care, which includes the promotion of equal or similar products or services by email or personally addressed normal mail. The affected person has a permanent right of objection, which we point out at any such use.

In any case, affected persons get informed at the collection of their data as well as at any further use on kind, scope and purpose of the use for advertising. They will also be informed on the appropriate legal basis, their rights and, if applicable, the source of their data.

1.7.3 Data Processing for Offering Online-services

Data will be used for offering online-services only to such extent as permitted by law and covered by the privacy declaration on our website.

1.7.4 Privacy of Employees

Dermalog respects rights and freedoms of its employees by collecting their consent and paying the most possible attention to voluntariness as far as the collection and processing of such data is not required for conclusion, execution or termination of employment contracts in accordance with the applicable data privacy laws. The employees are granted the right to inspect their personnel records to the extent as intended by law and can claim for modification or deletion of their personal information subject to statutory requirements.

1.7.5 Processing of Biometric Data

As developer and manufacturer of systems based on biometry, we necessarily process biometric data for business or testing or enable third parties to do so. This, for example, applies to systems permitting or preventing access to hardware or software, or to various forms of video control. Biometric data are treated as so-called special category personal data which are, according to their nature, highly sensitive with respect to fundamental rights and basic liberties. They are specially protected, because their processing bears high risks for the fundamental rights and basic liberties. When processing photos biometrically, special technical measures are applied which allow the unambiguous identification or authorization of a natural person. To meet concerns, we process such data generally only with the voluntary consent of the persons affected. Upon design, configuration and use of such systems we also apply technical and organizational measures to ensure a maximum protection

of privacy. This especially includes particular measures of input control, pseudonymization and encryption of the respective data, strong appliance of access rights, checks for functionality, intimacy, integrity, availability, recoverability and capacity of data processing systems and services, prior checking and permanent evaluation of possible risks. Additionally, our Data Protection Officer is being involved in any action of arranging or applying data processing to supervise and monitor such activities.

1.8 Requirements for the Transmission of Personal Data

Personal data will only be transmitted to third parties if explicitly agreed by the person concerned or if permitted by law for the certain purpose and under consideration of an appropriate level of data protection. By agreement and confirmation we ensure that data will only be transmitted, if proper technical and organizational measures have been taken to guarantee the protection of personal data also during and after the transmission. Even after the transmission, duties to supply information and rights of the respective persons are observed by a close cooperation with the third party with respect to the management of data.

Typically, the following standard cases for transmission and disclosure of personal data occur at Dermalog:

1.8.1 Internal Transmission of Data within the Company

Within the company, personal data will be transmitted, if the concerned person has explicitly agreed in accordance with the principles stated in chapter 1.7.1 or applicable law permits the transmission. Particularly in such cases where the office in charge has a mainly legitimate interest in the data transmission, such transmission will take place within the scope legally permitted. A general privilege for transmission of data between different enterprises of Dermalog does not exist, which means that any transmission of personal data within the Dermalog group must be justified under the aspect of privacy laws and the enterprises as independent responsible offices guarantee an effective data protection management. A transmission of personal data takes place particularly for the internal administration, as far as common IT installations or systems are used and personal data of customers and employees must be processed.

Dermalog will not submit your data to any third party for advertising, unless you have explicitly agreed on this.

1.8.2 Order Processing

In order to offer professional services and at the same time we pay high respect to the interests of employees and colleagues, in some areas we work with specialized external service providers. This applies mainly to the maintenance of IT systems, the proper destruction of files and the design of our website.

As far as for these purposes data are transmitted to third parties or these parties could get access to such data, Dermalog ensures by contract that data are processed only for the legitimate purposes and in strict compliance with our instructions concerning the means and purposes of the data processing as well as with this privacy declaration and any applicable privacy regulations. Correspondingly, any data transmission will be recorded.

The order processors are obliged towards Dermalog to take appropriate technical and organizational measures in order to meet any such privacy requirements, also in case of a possible data transmission to third countries and verify this continuously.

Dermalog itself complies to any such privacy requirements whenever acting as order processor for third parties. This can be proved by appropriate agreements.

1.8.3 Public Offices

Dermalog transmits personal data to public offices, particularly to law enforcement agencies and revenue authorities, to such extent as obliged by law or or upon order of public authorities. Any affected persons will get informed as soon as possible, unless applicable law forbids this.

1.9 Review and Revision of this Policy

Based on our processing records, the Data Protection Officer checks the data processes within the company permanently regarding their conformity to legal requirements. This also includes the observance of any changes in the privacy laws. Whenever necessary, processes get adapted. Accordingly, our privacy policy gets reviewed regularly.

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www.dermalog.com

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