



ENTRUST

**ENTRUST BIOMETRIC DATA
NOTICE**

Contents

Entrust Biometric Data Notice	3
What is Biometric Data?	3
What Biometric Data Do We Collect?.....	3
How Do We Use Your Biometric Data?	3
To Whom Do We Disclose Your Biometric Data?	3
How Long Do We Retain Your Biometric Data?	4
How Do We Secure Your Biometric Data?	4
International Data Transfers	4
Data Privacy Rights	5
Amendments to this Notice.....	5
Contact Information	5

Entrust Biometric Data Notice

Last updated: January 17, 2024

This notice describes how Entrust and its service providers collect and process biometric data in connection with the identity verification services we provide to our business customers (the “Services”). For additional processing details related to these products, refer to the individual product privacy notices found [here](#).

Our business customers are responsible for their compliance with applicable law governing their collection, possession, storage, use, disclosure, and/or transmission of biometric data, including, for example, by developing and complying with their own biometric data policies.

What is Biometric Data?

As used in this notice, “biometric data” means, collectively, “biometric identifiers” and “biometric information.” Common examples of “biometric identifiers” include retina or iris scans, fingerprints, voiceprints, and scans of hand or face geometry. “Biometric information” means any information, regardless of how it is captured, converted, stored, or shared, based on an individual’s biometric identifier and used to identify an individual.

What Biometric Data Do We Collect?

When you use the Services, we or our service providers may collect biometric data comprising a scan of your face geometry. More specifically, the Services may require you to upload an image of your government-issued or other identification document, as well as a photograph or “selfie” taken using your mobile or other device. The Services use these images to detect the geometry of your face (sometimes called a “faceprint”).

How Do We Use Your Biometric Data?

We and our service providers may use your biometric data for the following purposes:

- to assist with our verification of your identity,
- to comply with our legal, regulatory, or contractual obligations, and
- to improve the Services.

To Whom Do We Disclose Your Biometric Data?

As noted above, we use service providers to assist with the provision of the Services. We may disclose your biometric data to those service providers, and they may further disclose your biometric data to the service providers that help them provide the Services.

We and our service providers may also disclose your biometric data to other third parties (to the extent permitted by law) to (i) enforce our or their legal rights, (ii) to comply with our or their legal and contractual obligations, (iii) to cooperate with law enforcement agencies concerning conduct or activity that we or they reasonably believe may violate applicable law, (iv) if required by a subpoena, warrant, or other valid court order; (v) to prevent harm, loss, or injury to others; and (vi) with your or your authorized representative's express consent.

Neither Entrust nor its service providers will sell, lease, trade, or otherwise profit from your biometric data. (Entrust may use your biometric data to improve the Services as explained further herein.)

For our current list of sub-processors, visit <https://www.entrust.com/legal-compliance/data-privacy/sub-processors>.

How Long Do We Retain Your Biometric Data?

We and our service providers may retain your biometric data until (i) the initial purposes for collecting your biometric data have been satisfied; or (ii) within 3 years of your last interaction with our customer, whichever occurs first. Upon the occurrence of either (i) or (ii), we will permanently destroy your biometric data.

How Do We Secure Your Biometric Data?

We and our service providers use a reasonable standard of care to store, transmit, and protect your biometric data from unauthorized disclosure. Such storage, transmission, and protection from unauthorized disclosure will be performed in a manner that is the same as or more protective than the manner in which Entrust and its service providers (as applicable) store, transmit, and protect other confidential and sensitive information from unauthorized disclosure.

International Data Transfers

To the extent we or our service providers engage in cross-border transfers of biometric data, those transfers will be made in accordance with standard contractual clauses put in place by the relevant data protection authority or an equivalent mechanism. More information regarding Entrust's data transfers is available [here](#).

Legal Basis for Processing Biometric Data

The legal basis for processing biometric data is performance of a contract (e.g., providing products and/or performing services) or, in some jurisdictions, public interest (e.g., improving the Services). To the extent required by applicable law, our business customers will obtain your written authorization (i.e., explicit consent) for Entrust and its service providers to process your biometric data prior to the collection of such data.

Data Privacy Rights

As a business-to-business provider, our customer is the data controller for all biometric data we collect with the exception that Entrust is the data controller when using biometric data directly to improve its Services. In its role as a data processor, Entrust will assist its customers, to the extent reasonable and practicable, in responding to verified data subject requests they receive. As a data subject, you may also directly submit a data subject request to us [here](#).

Amendments to this Notice

We reserve the right to amend this Biometric Data Notice from time to time as our business, laws, regulations, and industry standards evolve. Any changes are effective immediately following the posting of such changes to <https://www.entrust.com/legal-compliance/product-privacy>. We encourage you to review this notice from time to time to stay informed.

Contact Information

For questions about this notice, please contact privacy@entrust.com.