



STANDARD USER USAGE POLICY

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1. SMILE ID USAGE PRINCIPLES

At Smile ID we require our “Customers” (organizations that use our products) to adhere to basic principles of transparency and responsibility.

- 1.1. We believe privacy means people knowing what they are signing up for — in plain language or clear illustrations.
- 1.2. We require that our Customers adhere to local laws around data collection and storage.
- 1.3. We require that our Customers do not collect information on Users who are children or under the age of 16.

2. INFORMED CONSENT

- 2.1. Users of data capture applications powered by Smile ID must be informed about the information that is collected from them and be given an opportunity to provide or withhold consent for that information to be collected.
- 2.2. Users must be provided with a mechanism to withdraw their consent at any time. The procedure for User consent withdrawal should be as straightforward as the consent collection process and should result in the cessation of data processing and deletion of their data, unless retention is required by law.
- 2.3. This includes letting Users know that using the product will involve taking and uploading “selfies” and in some cases, taking photos of identity documents.
- 2.4. Customers must make the Terms and Conditions of any application powered by Smile ID easily available to end users, inside the User’s application, in the predominant local language(s) of the Users. Swahili, Arabic and French have been included as a sample translation due to Smile ID’s operational footprint in East and Francophone Africa .

2.4.1. SAMPLE NOTICE IN ENGLISH

“By using this product, you consent to Smile Identity Inc, a U.S.-based data controller, and [Customer, a company based in

_____], collecting images and device information about you and/or your identity documents for the purpose of identification, authentication and fraud prevention.

Smile ID may securely collect and process your information to detect and prevent identity-related fraud. This may include the use of artificial intelligence (AI) technologies and automated decision-making systems. These systems may automatically determine the authenticity of identity documents or match biometric features. No significant legal decisions will be made without human oversight. Your personal data may be processed by Smile ID for security monitoring, pattern recognition, and to improve verification systems. Smile ID may transfer your data to another territory for processing in accordance with the Data Protection Laws applicable to your information. You retain all your data subject rights, including the right to data portability, rectification, and the right to opt-out of having your information processed in this regard. If you do not consent to the processing of your Personal Data as described above, please refrain from using this product. For more details, you can review Smile ID's privacy policy at <https://usesmileid.com/legal/privacy-policy>."

2.4.2. **SAMPLE NOTICE IN SWAHILI**

"Kwa kutumia bidhaa hii, unakubali kwamba Smile Identity Inc, msimamizi wa data aliye Marekani, na [Mteja, kampuni yenye makao yake nchini _____], wanakusanya picha na maelezo ya kifaa kukuhusu wewe na/au hati zako za utambulisho kwa lengo la utambuzi, uthibitishaji na kuzuia ulaghai.

Smile ID inaweza kukusanya na kuchakata taarifa zako kwa usalama ili kugundua na kuzuia ulaghai unaohusiana na utambulisho. Hii inaweza kujumuisha matumizi ya teknolojia za akili bandia (AI) na mifumo ya kufanya maamuzi kiotomatiki. Mifumo hii inaweza kuamua uhalisi wa hati za utambulisho au kulinganisha sifa za kibayometriki. Hakuna maamuzi muhimu ya kisheria yatakayofanywa bila usimamizi wa binadamu. Data yako ya kibinafsi inaweza kuchakatwa na Smile ID kwa ajili ya ufuatiliaji wa usalama, utambuzi wa muundo, na kuboresha mifumo ya uthibitishaji. Smile ID inaweza kuhamisha data yako kwenye eneo jingine kwa ajili ya kuchakatwa kulingana na Sheria za Ulinzi wa Data zinazotumika kwa taarifa zako. Unahifadhi haki zako zote za mhusika wa data, ikiwemo haki ya uhamishaji wa data, masahihisho, na haki ya kujiondoa katika mchakato wa kuchakatwa kwa taarifa zako kwa njia hii. Ikiwa

hukubali kuchakatwa kwa Data yako ya Kibinafsi kama ilivyoenezwa hapo juu, tafadhali usitumie bidhaa hii. Kwa maelezo zaidi, unaweza kukagua sera ya faragha ya Smile ID kwenye kiungo hiki:<https://usesmileid.com/legal/privacy-policy>.”

2.4.3. SAMPLE NOTICE IN ARABIC

وهي جهة تحكم بيانات مقرها، Smile ID باستخدام هذا المنتج، فإنك توافق على أن تقوم شركة. الولايات المتحدة، و[العميل، وهي شركة مقرها _____] بجمع صور ومعلومات الجهاز عنك و/أو وثائق هويتك لأغراض تحديد الهوية والمصادقة ومنع الاحتيال بجمع ومعالجة معلوماتك بشكل آمن للكشف عن الاحتيال في الهوية ومنعه. قد تقوم Smile ID قد تقوم يشمل ذلك استخدام تقنيات الذكاء الاصطناعي وأنظمة اتخاذ القرار الآلية. قد تحدد هذه الأنظمة تلقائياً صحة وثائق الهوية أو مطابقة السمات البيومترية. لن يتم اتخاذ أي قرارات قانونية مهمة دون إشراف بشري بمعالجة بياناتك الشخصية لأغراض المراقبة الأمنية والتعرف على الأنماط Smile ID قد تقوم وتحسين أنظمة التحقق بياناتك إلى منطقة أخرى لمعالجتها وفقاً لقوانين حماية البيانات السارية على Smile ID قد تنقل معلوماتك. تحتفظ بجميع حقوقك المتعلقة بالبيانات، بما في ذلك الحق في نقل البيانات وتصحيحها، والحق في إلغاء معالجة معلوماتك في هذا الصدد. إذا كنت لا توافق على معالجة بياناتك الشخصية كما هو موضح أعلاه، فيرجى الامتناع عن استخدام هذا المنتج. لمزيد من التفاصيل، يمكنك مراجعة سياسة Smile ID الخصوصية الخاصة بـ.

2.4.4. SAMPLE NOTICE IN FRENCH

“En utilisant ce produit, vous consentez à ce que Smile Identity Inc, responsable du traitement des données, basé aux États-Unis, et [Client, une société basée à _____] collecte des images et des informations sur votre appareil et/ou vos documents d'identité à des fins d'identification, d'authentification et de prévention des fraudes.

Smile ID peut collecter et traiter vos informations en toute sécurité afin de détecter et de prévenir les fraudes liées à l'identité. Cela peut inclure l'utilisation de technologies d'intelligence artificielle (IA) et de systèmes de prise de décision automatisés. Ces systèmes peuvent déterminer automatiquement l'authenticité des documents d'identité ou comparer des caractéristiques biométriques. Aucune décision juridique importante ne sera prise sans surveillance humaine. Vos données personnelles peuvent être

traitées par Smile ID pour la surveillance de la sécurité, la reconnaissance des formes et l'amélioration des systèmes de vérification. Smile ID peut transférer vos données vers un autre territoire pour traitement conformément aux lois sur la protection des données applicables à vos informations. Vous conservez tous vos droits en tant que personne concernée, y compris le droit à la portabilité des données, le droit de rectification et le droit de refuser le traitement de vos informations à cet égard. Si vous ne consentez pas au traitement de vos données personnelles comme décrit ci-dessus, veuillez vous abstenir d'utiliser ce produit. Pour plus de détails, vous pouvez consulter la politique de confidentialité de Smile ID sur <https://usesmileid.com/legal/privacy-policy>."

3. ADHERENCE TO LOCAL LAWS


- 3.1. Different countries have different policies around the collection, processing and storage of personal information.
- 3.2. Wherever a Smile ID Customer operates, they must adhere to Applicable Data Protection Laws regarding the collection, handling or storage of personal information.
- 3.3. Customers shall ensure that all Users are provided with clear and accessible mechanisms to exercise their rights under Applicable Data Protection Laws. This includes providing end users with the contact details of Smile ID's Data Protection Officer at dpo@usesmileid.com as well as informing Users of available escalation pathways, including their right to lodge complaints with the relevant data protection supervisory authority.

4. NO USERS UNDER 16

- 4.1. If a Smile ID Customer believes that they have collected images of users who are under the age of 16, or Users who have not provided consent, they are required to notify Smile ID immediately.
- 4.2. Upon request from Smile ID, Customers may be required to destroy any data or images collected from or about those Users, unless otherwise prescribed by law.

5. NO DISCRIMINATION

- 5.1. Customers shall ensure that all identity verification processes, including those involving automated decision-making or biometric analysis, are



designed and implemented in a manner that prevents discriminatory outcomes. Specifically:

- 5.1.1. processing shall not result in unfair or biased treatment of Users based on race, ethnicity, gender, age, nationality, disability, or any other protected characteristic under applicable laws;
- 5.1.2. Customers must regularly assess and mitigate risks of algorithmic bias or disparate impact, particularly in relation to demographic attributes; and
- 5.1.3. where automated systems are used, Customers shall implement appropriate safeguards, including human oversight, to ensure fairness, accuracy, and non-discrimination in identity verification outcomes.