



PRIVACY POLICY

This privacy policy was last updated on 2026-07-10.

1. SUMMARY

- 1.1. This Privacy Policy ("Policy") describes how Smile Identity Inc. and its Affiliates ("Smile ID," "we," "our," "us") collects, processes, uses, and discloses certain information obtained through your use of our website (the "Site"), as well as information that we collect through our services or if you apply for a job with us (collectively with the Site, the "Services").
- 1.2. Smile ID acts as a data controller — and, where applicable under the Protection of Personal Information Act, 4 of 2013 ("POPIA"), a Responsible Party — for the personal data it collects and processes in connection with its services, including identity verification, ID fraud detection, and Anti-Money Laundering (AML) screening.

2. DEFINITIONS

- 2.1. **"Affiliates"** refers means, with respect to a Party, any entity or individual that directly or indirectly controls, is controlled by, is under common control with, or is otherwise contractually engaged by such Party in a manner that supports shared commercial, operational, or technological objectives relevant to this Agreement.
- 2.2. **"Server logs"** refers to a document that automatically records information and details about online interactions with our sites. For example, server logs may record information about a person's visit to our Site at a particular time and day and collect information such as device ID or IP address.
- 2.3. **"Cookies"** refer to small files that are stored on a user's device through the use of our websites. A cookie allows the Site to recognize users who have visited and may store user preferences and other information. For example, cookies can be used to collect or store information about use of our website during a session and over time (including the pages viewed, and the files downloaded), the device's operating system, device ID, IP address, and users general geographic location.
- 2.4. **"Personal Information"** refers to information that can be used to identify, locate, or contact an individual, alone or when combined with other personal or identifying information.



For South African data subjects, “Personal Information” includes special personal information as defined in section 26 of POPIA, such as biometric information (e.g. facial geometry), which requires a specific legal basis under section 27 of POPIA before it may be processed.

3. INFORMATION WE COLLECT AND MAINTAIN

3.1. Third Party Collection

We collect information directly from you when you use the services and from third parties who provide it to us through the Services.

We may also collect information from Customers and third parties pursuant to the explicit consent of the data subjects where required. We further automatically collect certain information about persons from their smartphone or other device when they use, access, or interact with our Services. This includes but is not limited to technical data like IP addresses, device identifiers, location data . Additionally, we collect information when persons use any of the devices related to our ID verification, fraud detection and KYC services.

3.2. Cooperation with Partners for Data Subject Rights

Where Smile ID delivers services in partnership with trusted third parties, we may coordinate with these partners to ensure that data subject rights requests (for example, access, correction, or deletion) are handled in a timely and effective manner. The partner responsible for fulfilling a specific request will be identified to you, and Smile ID will facilitate the process to make sure your rights are respected. The detailed cooperation process between Smile ID and its partners is documented in our contractual arrangements and is available to supervisory authorities upon request.

3.3. Personal information provided directly by you through the Site

We collect personal information from Users who create an account on the Site, log into their account on the Site, or apply to a job with us. We may collect the following categories of information from these users:

- Full name
- The password you create for your account
- Email address
- Phone number

- Organization name
- Information about your customers
- Payment card information
- Resume information (including experiences and education information)
- Any personal information you provide in your cover letter
- Information we collect through your social media profiles or personal website

3.4. **Personal information collected through our identity verification services**

We may collect the following categories of information about Users who are subject to our identity verification, ID fraud detection, authentication or KYC services through our Customers and partners:

- Full name
- Contact Information
- Biometric information (facial geometry)
- Government ID number (from a national database)
- A photo of your face (selfie)

4. **HOW WE USE YOUR INFORMATION**

4.1. We use the information that we collect for a variety of purposes. Our legal bases for processing personal information are:

- our legitimate interest in running and maintaining our business;
- our legitimate interest in providing secure authentication and preventing fraud;
- the performance and fulfilment of our contracts;
- consent; and
- compliance with our legal obligations.

In many instances, more than one of these legal basis apply to the processing of your personal information.

4.2. The purposes for which we use personal information include to:

- provide Users with our Services;
- help detect and prevent fraud which may include the use of artificial intelligence and machine learning technologies and maintaining secure anti-fraud databases;

- analyze behavioural patterns and technical anomalies to generate advanced fraud-protection signals (Smile ID IRisk Intelligence Signals) and improve our fraud networks;
- respond to questions or requests concerning the Services;
- fulfill the terms of any agreement requiring processing of personal data;
- fulfill requests for our Services or otherwise complete a transaction that persons initiate;
- send information about our Services and other topics that are likely to be of interest, including newsletters, updates, or other communications, including promotional emails;
- improve our artificial intelligence and machine learning technology;
- deliver confirmations, account information, notifications, and similar operational communications;
- improve User experience and the quality of our products and Services;
- comply with legal and/or regulatory requirements;
- aggregate and de-identify information;
- serve advertisements;
- analyze how visitors use the Services and various Services features, including to count and recognize visitors to the Services;
- create new products and Services; and
- manage our business.

5. WITH WHOM AND WHY WE SHARE YOUR INFORMATION

5.1. We share personal information with third parties for a variety of purposes, as described below.

5.1.1. **Businesses who sign up for our Services**

We may share personal information, which includes your identity verification status, with the businesses who utilize our verification KYC services. In addition to this privacy policy, information collected from persons by businesses who use our services may be subject to the privacy policies of these businesses.

5.1.2. **Fraud prevention**

We process personal data for fraud prevention and identity Verification. This includes creating and maintaining a secure, hashed database used by us and select partners, comparing



customer data with the database to detect anomalies using Artificial Intelligence systems and models developed by the Smile ID team, and deploying human review to evaluate the decisions of the machine following a rule-based system. We only process data points strictly necessary for fraud prevention, use secure storage, apply strict access controls, and conduct regular reviews to ensure data accuracy and proportionality.

5.1.3. Data sharing

We may share personal information, including identity verification data, with our Affiliates and partners to facilitate fraud prevention, identity verification, and secure transaction processing, or to develop new products to improve identity verification and fraud prevention in accordance with applicable laws and regulations.

5.1.4. Third-party service providers

Smile ID uses third-party service providers that perform services on our behalf, including web-hosting companies and mailing vendors. These service providers may collect and/or use personal information we process, including information that identifies persons, to assist us in achieving the purposes discussed above. We may also share personal information with third parties when necessary to fulfill requests for Services; to complete a transaction initiated by persons through third parties; to meet the terms of any agreement that persons may have with third parties or with us; or to manage our business.

5.1.5. Analytics

We partner with certain third parties to obtain the automatically collected information discussed above and to engage in analysis, auditing, research, and reporting. These third parties may use pixels or server logs, and they may set and access device IDs and IP addresses from your device.

5.1.6. Interest-based Advertising

The Services also enable third-party tracking mechanisms to collect information about persons and personal computing devices for use in online interest-based advertising. For example, third parties, such as Facebook, may use personal information deposited in our app to target online ads to persons who may have used our apps. In addition, our third-party advertising networks might use personal information obtained from use of our Services to help target advertisements based on mobile activity in general. For information about interest-based advertising practices, including

privacy and confidentiality, visit the Network Advertising Initiative website or the Digital Advertising Alliance website.

- 5.2. We share personal information with third parties for a variety of purposes, as described above. The use of online tracking mechanisms by third parties is subject to those third parties' own privacy policies, and not this Policy. Persons who prefer to prevent third parties from setting and accessing cookies on their computer or other device may set their browser to block cookies.
- 5.3. Additionally, persons may remove themselves from the targeted advertising of companies within the Network Advertising Initiative by opting out [here](#), or of companies participating in the Digital Advertising Alliance by opting out [here](#). Although our Site currently does not respond to "do not track" browser headers, persons can limit tracking through these third-party programs and by taking the other steps discussed above.

6. YOUR CHOICES

- 6.1. Persons who may wish to access, correct, or delete the personal information we have on file, may contact us at dpo@usesmileid.com
- 6.2. Residents of the EU, UK, South Africa, or other jurisdictions with Applicable Data Protection Laws, may have certain rights. These rights may include:
 - The right to be informed about our data collection practices;
 - The right to access and rectify your data;
 - The right to erase or delete your data;
 - The right to data portability;
 - The right to restrict and object to the processing of your data, including for direct marketing purposes — under POPIA section 69, you may object to direct marketing at any time and we must stop immediately on receipt of your objection;
 - The right to opt-out of marketing emails and text messages;
 - The right to limit our use of any automated decision-making processes;
 - The right to lodge a complaint with your local data protection authority — for South African data subjects, this is the Information Regulator: infoereg@justice.gov.za | www.inforegulator.org.za; and
 - The right to withdraw consent (to the extent applicable).

- 6.3. To exercise any of the rights listed above, please contact our Information Officer at dpo@usesmileid.com. We will respond to your request as soon as reasonably possible but no longer than thirty (30) calendar days.

7. EXTERNAL LINKS

- 7.1. We do not warrant, endorse, guarantee, or assume responsibility for the accuracy or reliability of any information offered by third-party websites linked through the site or any website or feature linked in any banner or other advertising.

8. DATA SECURITY

- 8.1. We employ physical, technical, and administrative procedures to safeguard the personal information we collect both online and offline. However, no website or platform is 100% secure, and we cannot ensure or warrant the security of any information you transmit through the Services or to us, and therefore you transmit such information at your own risk. In the event of a security compromise affecting your personal information that poses a real risk of harm, we will notify the relevant supervisory authority and affected data subjects as required by Applicable Data Protection Laws, including section 22 of POPIA.

9. DATA RETENTION

- 9.1. We retain personal information about you only for as long as is necessary to fulfil the purpose for which that information was collected or as required or permitted by law [, for example, under Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) laws where applicable]. We may also retain certain data points for fraud prevention and identity Verification purposes. This is based on our legitimate interest in maintaining the security and integrity of our systems and services, as well as preventing ID-related fraud for Users and third-party service providers. We do not retain personal information longer than is necessary to achieve this purpose. Individuals reserve their rights to object to this processing or request the erasure of their information under applicable data protection laws. We may however, continue to retain the data where: (i) in compliance with a legal obligation; (ii) required for legal claims; (iii) necessary for reasons of substantial public interest; (iv) necessary for preventing or detecting unlawful behaviour; or (v) as otherwise lawfully permitted by Applicable Data Protection Laws. When we destroy personal information which no longer needs to be retained, we do so in a way that prevents that information from being restored or reconstructed. Further information about our data retention practices is outlined in the Smile ID

Data Retention Policy [here](#).

10. INTERNATIONAL USERS

- 10.1. The information that we collect through or in connection with the Services is transferred to and processed in the United States of America for the purposes described above. We may also subcontract the processing of your data to, or otherwise share your data with, Affiliates or third parties in countries other than your country of residence. The data-protection laws in these countries may be different from, and less stringent than, those in your country of residence. However, we comply with all Applicable Data Protection Law regarding international data transfers. Where personal information of South African data subjects is transferred internationally, we ensure that appropriate safeguards are in place as required by section 72 of POPIA, which may include the recipient country having adequate data protection laws, the data subject's consent, or a Data Transfer Agreement incorporating equivalent protections.
- 10.2. By using the Services or by providing any information to us, persons expressly consent to such transfer and processing.

11. CHILDREN

- 11.1. Content on the Services is directed at individuals over the age of 18 and is not directed at children. Under POPIA, a child is any person under the age of 18, and we do not process personal information of children without appropriate parental or guardian consent as required by section 35 of POPIA. We do not knowingly collect personally identifiable information from minors.

12. CHANGES TO THIS POLICY

- 12.1. We may make changes to the Services in the future and as a consequence will need to revise this Policy to reflect those changes. We will notify you and post all such changes on the Services, and we encourage users to review this page periodically.

13. HOW TO CONTACT US

- 13.1. If there are questions or concerns about this Policy, please contact our Information Officer (designated under section 55 of POPIA) at dpo@usesmileid.com. For South African POPIA enquiries that are not resolved to your satisfaction, you may escalate to the Information Regulator (South Africa): inforeg@justice.gov.za | www.inforegulator.org.za.