

Notification to Processing of Personal Data (hereinafter - “Notification”)

1. Introduction

I hereby acknowledge and agree that my personal data, which I am providing or have provided to the Company* – the organization with which I wish to establish a business relationship after completion of KYC – will be processed by the Sumsb Group of Companies (hereinafter referred to as the “Service Provider” or “Sumsb”). This processing is necessary to verify my identity for the Company’s purposes of carrying out customer due diligence procedures in accordance with its internal procedures and policies. Please refer to the [Privacy Notice](#) for details about the identity and contact details of Sumsb.

My name, surname, and other means of identification for the purposes of this Notification shall be established during the processing of my personal data in accordance with this Notification.

2. Purpose of Data Processing

I hereby acknowledge and agree that my personal data will be processed for the following purposes:

1. To fulfill the Company’s compliance with applicable laws and regulations, including age restrictions and anti-fraud measures;
 2. To verify my identity and ensure compliance with the Company’s internal policies;
 3. To prevent fraud, illegal practices, and the use of forged documents;
 4. For compatible purposes of the Service Provider acting as a separate data controller, including service development, fraud and criminal activity prevention, litigation hold, and statutory obligations, as detailed in the [Privacy Notice](#).
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3. Delegation of Data Processing

I acknowledge and agree that:

1. The Company, as the data controller, is responsible for determining the purposes and means of processing my personal data. The Company’s details (including address) are known to me.
 2. The Company may delegate the processing of my personal data to data processors, such as the Service Provider, if necessary to achieve the purposes outlined above.
 3. My personal data may be disclosed to entities associated with the Service Provider, which are obligated to implement appropriate technical and organizational measures to ensure the safety of my personal data.
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4. Data Processing Methods

*Company means SMARTDYNAMICS Group includes, in particular:

SMARTDYNAMICS LIMITED, registration number HE 399424, address: Omonoias 13, 3052 Limassol, Cyprus;

KADAM CY Ltd, registration number HE 424427, address: Omonoias 13, 3052 Limassol, Cyprus;

Kadam Advertising Ltd, registration number HE 441056, address: Omonoias 13, 3052 Limassol, Cyprus.

I hereby acknowledge and agree that:

- My personal data will be processed using automated methods, including text extraction, verification of authenticity/validity, and other automated processing of photos and scanned copies of documents.
- Processing activities include collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, transfer (including cross-border transfer, where necessary), alignment or combination, restriction, erasure, and destruction.
- My personal data may be checked against multiple databases, including International Politically Exposed Persons (PEPs) lists, sanctions lists, and other watchlists, as well as reviewed in media information sources.

When transferring personal data outside the EEA, the Company and Sumsub implement appropriate safeguards, such as EU adequacy decisions, UK adequacy regulations, or standard contractual clauses. Third-party processors also rely on appropriate safeguards, including binding corporate rules or other approved mechanisms.

5. Processing of Biometric Data

I hereby acknowledge and agree that:

- My biometric data, including facial scans, will be processed to confirm the liveness of my face and verify that the presented identity document belongs to me.
- This includes automated reading, verification of authenticity, and comparison of my facial image with the photo on my identity document during liveness checks, video selfies, or video identification processes.
- The processing also supports fraud prevention and the development of fraud control networks.

6. Categories of Personal Data Processed

The following categories of personal data may be processed in accordance with this Notification:

1. **General personal data:** Full name, sex, personal identification code or number, date of birth, legal capacity, nationality and citizenship, location (street, city, country, postcode).
2. **Facial image data:** Photos of a face (including selfie images), photos or scans of a face on the identification document, videos, and sound recordings.
3. **Biometric data:** Facial scans.
4. **Identity document data:** Document type, issuing country, number, expiry date, MRZ, information embedded into document barcodes, and security features.
5. **Contact details:** Address, email address, phone number, IP address.
6. **Technical data:** Information regarding the date, time, and activity in the services; IP address and domain name; software and hardware attributes (e.g., camera name and type); general geographic location (e.g., city, country) from the data subject's device.
7. **Relevant publicly available data:** Information about a person being a PEP or included in sanctions lists.

8. **Additional personal information:** Data obtained during communications with the data processor (e.g., requests, reports).
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7. Data Subject Rights

I hereby acknowledge that I have been informed of my rights under GDPR and other applicable privacy laws, which include the right to:

1. Withdraw consent to personal data processing, if processing is based on consent;
2. Access and adjust personal data;
3. Request suspension of processing for a specific reason;
4. Object to data processing or transfer;
5. Object to being subject to automated decision-making or profiling;
6. Request erasure of personal data, subject to applicable laws and regulations.

These rights may be exercised by contacting the Company directly or by submitting a notice to the Service Provider at privacy@sumsub.com. Some rights may be limited by statutory obligations of the Company or the Service Provider.

I also acknowledge my right to lodge a complaint with the supervisory authority. For processing activities related to Sumsub, please see details in its [Privacy Notice](#).

8. Data Retention and Destruction

I hereby acknowledge that:

- My personal data will be retained and stored by the Company and the Service Provider for as long as necessary to fulfill the purposes outlined in this Notification or as required by applicable laws.
 - Upon expiration of the retention period or when the Company's purposes are achieved, my personal data will be permanently destroyed based on the Company's instructions.
 - Where the Service Provider independently defines compatible purposes for data processing, personal data will be retained as specified in its [Privacy Notice](#).
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I hereby represent that I have carefully read all of the above provisions, including the Privacy Notice available here, and do voluntarily and unequivocally agree with them.