



Data Privacy Statement

This privacy statement applies only to iWhoAml Limited online services and related offerings such as W-Codes®. These services may enable you or your end users to purchase, subscribe or use other products and online services from third parties with different privacy practices. Those other products and online services will be governed by their respective privacy statements and policies.

This agreement has been written in European English. The English version supersedes any other language version if any differences between them are found.

This document is written for the person, organization or company (our "customer") that signs up with iWhoAml and related offerings. All references to "you" or "your" in this privacy statement are to our customers, who in turn, may administer information to their end users. iWhoAml is not responsible for the privacy or security practices of our customers to their end users, which may differ from those set forth in this Privacy Statement. End users of Online Services administered by iWhoAml's customers should direct privacy inquiries to their account administrators.

Please be advised that if you access a Shared or Company account, the administrator of the account may be able to assume control of your personal data and logs of your activities.

Depending on the level of Services and type of services you registered with iWhoAml, we collect different kinds of information from or about you. This is information that we will ask you to provide us in order to deliver you the service you require from us.

Information gathering

iWhoAml is committed to minimize the information we keep about you. However, it is impossible to provide service to you without keeping some essential information, in order to provide you the good service you deserve, we collect:

- Content and other information you provide us when you use our Services, including when you sign up for an account, enable characteristics or register W-Codes. This can include information in (data) or about the content (metadata) you provide, such as information contained in a file submitted by you. Moreover, we may collect information about how you use our services, such as the types of content you view, engage with or the frequency and duration of your activities.
- Content and information that other people provide of you when they use our services, such as when they share info of you, send a message to you, upload or import your contact information.

- Information of people and groups you are connected to and how you interact with them. That includes for example information contained in an address books from a device provided that you allow us to do so by setting your device to allow visibility of the address book.
- Information from or about the computers, phones, or other devices where you install or access our Services, depending on the permissions you have granted. This includes for example:
 - Operating system, hardware version, device settings and identifiers, file and software names and types data.
 - Device locations, including specific geographic locations, such as through GPS.
 - Connection information such as language and time zone, the name of your mobile operator or ISP, browser type, mobile phone number and IP address.
- Information about when you visit or use third-party websites and Apps that use our services, including the websites and Apps you visit and your use of our services or Apps on those websites, as well as information the developer or publisher of the App or website provides us about you.
- Information about you and your activities on and off iWhoAml from third-party partners, such as information from a partner when we jointly offer services or from an advertiser about your experiences or interactions with them.
- Surveys information that you voluntarily agree to participate on, the results of test of new features and your opinions and comments about our services.
- If you purchase any goods or services from us, we may collect information about the transactions, the purchase and payments. Currently, we use a third party to process your payment information, such as your credit or debit card number and other card information. Therefore, we don't keep that kind of information. However, we reserve the right to change that without changing this Data Privacy Policy. Notifications will be provided to the user if any information of that kind is to be kept in iWhoAml systems.

Information usage

In order to deliver the service and to improve your customer experience we use the information gathered from you to:

- Provide, improve, personalize and develop Services for you and others.
- Make suggestions for you to improve your service experience.
- Remind you of expiration days or upgrade offers available for you.
- Suggest people you may know or you may have shared interest or hobbies with.
- Analyze trends, service delivery user's satisfaction of our products and services.
- Troubleshooting and Auditing activities.
- Communicate with you about our Services and let you know about our policies and terms. Likewise to respond to you when you contact us.

- Send you third party marketing communications subject to your consent.
- Help verifying accounts and activity to promote safety and security on and off our Services, such as by investigating suspicious activity or violations of our terms or policies. Our support team work to protect your account using automated monitors and technologies that can make use of the data collected about you.
- Keep to improving our advertising and measurement systems so that we can show you relevant ads to you and to measure the effectiveness and reach of ads and services. Advertising banners are just displayed in our menus for free service users only. Paid subscription customers enjoy an advert-free environment.

Cookies usage

We use cookies (small text files placed on a device's hard disk by a web service) and similar technologies to provide and support our Services. For example, cookies and web beacons may be used to store a user's preferences and settings, to gather web analytics, to authenticate a user or to detect fraud. To learn more about how to control cookies and similar technologies, please see your Internet browser's documentation.

Choices you make regarding the use of cookies in your browser may impact your use of our services.

Information sharing

People use our Services to share information with others. This is made possible by sharing the information you choose to provide to other users. Please, be advise to share only the information that you wish other to be allowed to access to. Information that you decide to share become public to a group of people you know or to everyone on the Internet, depending on your selection. Therefore, it is your responsibility that the publication of that information, data or files does NOT infringe or is against any law, Intellectual Property rights or copyrights. Sharing information that doesn't belong to you may be unlawful and it is your responsibility not to do so.

We may suggest you the usage of third-party Apps, websites or other services which enable, improve or enhance our service. You will need to read their Policies and Privacy Terms as we operate as completely separated systems and we are not responsible of anyone else's practices. In addition, when you download or use such third-party services, they can access your public profile data.

If the ownership or control of all or part of our Services or their assets changes, we may transfer your information to the new owner.

We work with third party companies who help us provide and improve our Services or who use advertising or related products. This makes possible to operate our companies and provide free services to people around the world. We appreciate that you allow us to share Non-Personally Identifiable Information for Advertising, Measurement and Analytics.

Information accessibility

iWhoAml is a data processor acting on our customer's behalf. Therefore, we act upon your instructions provided through the management interfaces. As required by the law, we provide our customers with the ability to add, correct or delete your information when you request to do so following general practices and timeframes. Please, check information related to deletion and update further down in this document for details.

We do as much as possible to maintain our systems available all the time and proof of that commitment is the fact that we currently host our critical infrastructure on Microsoft Azure Data Centers. That means that our service and data availability levels are around 99.9%. However, iWhoAml does NOT provide any Service Level Agreement (SLA) for free subscriptions. Refer to SLA documentation for paid subscriptions.

Information integrity and data leak prevention

We work hard to prevent any unauthorized or unlawful access, disclosure, alteration, loss or destruction of data in our systems; however, no system is unbreakable and fully safe. We provide no warranties under our free subscriptions. Check the Terms and Conditions for pay subscriptions for any additional warranty.

Our systems are regularly backed up, Operation Systems and software are patched and infrastructure monitored. We are strongly committed to ensure your personal details are safe following the best security standard that we have available.

The transmission from you to us of personal data occurs over an encrypted secure channel. You can verify that in your Internet browser by checking that the transmission occurs over https and the iWhoAml's certificate is Trusted Extended Validated (EV) by a well recognized Certificate Authority (currently Digicert Inc). Transmissions of information that you have decided to make public is not transmitted over secure channel as there is no need. Email or SMS are not encrypted as it is not generally accepted by many systems and the information we transmit is not highly sensitive.

iWhoAml Limited store the information about you in Data Centre which complying with the US-EU Safe Harbor and the Swiss Safe Harbor frameworks. Currently, the vast majority of the information is stored in Microsoft Azure. For further information, please, check Microsoft standards at [Microsoft Privacy terms](#).

Information deletion and update

You can manage the content and information you share with others using our management console. You can even delete or update some information. Moreover, we store data for as long as it is necessary to provide products and services to you and others. Information associated with managing your account will be kept until your account is deleted, unless we no longer need the data to provide you with products and services.

You can delete your account any time. When you delete your account, we delete the information you have posted.

The term “delete” or “deletion” refers to the concepts in Information Systems. That means that the information will be no longer available through any user interfaces. However, it is technically impossible for us to destroy your information completely as there will be stored as 0s and 1s in hard drives and backup tapes of the data centers until overwritten or destroyed. This is no different from the vast majority of the services provided on the Internet. It is not that we don’t like to completely destroy the data; it is that it is not feasible to do so. Equally, information updates will change the data shown on iWhoAml interfaces; however, your previous information will be on backup devices for a period of time before completely destroyed.

Use of Subcontractors

iWhoAml may hire subcontractors to provide services on its behalf. Any such subcontractors will be permitted to obtain data only to deliver the services iWhoAml has delegated them to provide and will be prohibited from using data for any other purpose.

Legal requests and other obligations

We deliver our service world-wide. Therefore, we are obliged by local laws in the countries where we operate. As consequence we may access, preserve and share your information in response to a legal request (like a search warrant or court order) if we have a good faith belief that the law requires us to do so. This may include responding to legal requests from jurisdictions outside of the Republic of Ireland or the European Union where it may be required by law in that jurisdiction, it affects users in that jurisdiction, and it is consistent with internationally recognized standards. We may also access, preserve and share information when we have a good faith belief it is necessary to: detect, prevent and address fraud and other illegal activity; to protect ourselves, you and others, including as part of investigations; or to prevent death or imminent bodily harm. For example, we may provide information to third-party partners about the reliability of your account to prevent fraud and abuse on and off of our Services. Information we receive about you, including financial transaction data related to purchases made with us, may be accessed, processed and retained for an extended period of time when it is the subject of a legal request or obligation, governmental investigation, or investigations concerning possible violations of our terms or policies, or otherwise to prevent harm. We also may retain information from accounts disabled for violations of our terms for at least a year to prevent repeat abuse or other violations of our terms.

Notification of Policy changes

iWhoAml will email you at the address you provide to us, before making any changes to this policy and we’ll allow you access to the new terms and Service Privacy Statement. Likewise, the new Privacy statement will be available on our corporate site.

If you do not agree with the new terms, you will have the option to finalize your agreement without any penalties.

Your continued use of the iWhoAml Services, following notice of the changes to our terms, policies or guidelines, constitutes your acceptance of our amended terms, policies or guidelines.

Data Protection Contact

For all data protection related issues or misuse you can either contact iWhoAml at the corporate office or email data.protection@iWhoAml.com.

iWhoAml Limited

Company registered in the Republic of Ireland.

Registration Number: 565999

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