



Privacy Policy  
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## Privacy Policy

### About VirtualSignature.com

VirtualSignature.com is a digital onboarding platform that is used by professional organisations to carryout various online processes including; electronic signature exchange, document management and Identity verification. It is owned by Virtual Signature ID Validate Limited, T/A VirtualSignature-ID and registered with the Information Commissioners Office (ICO) number ZB321994. We take privacy very seriously and always strive to protect your personal information as required under the General Data Protection Regulation ((EU) 2016/679); the Data Protection Act 2018; the Privacy and Electronic Communications Directive 2002/58/EC (as updated by Directive 2009/136/EC) and the Privacy and Electronic Communications Regulations 2003 (SI 2003/2426) as amended.

### Please read this privacy notice very carefully

### People who use our services

VirtualSignature-ID offers numerous services. We must hold the details of the people who have requested the service in order to provide it. However, we only use these details to provide the service the person has requested and for other closely related purposes. For example, we might use information about people who have requested a publication to carry out a survey to find out if they are happy with the level of service they received. When people do subscribe to our services, they can cancel their subscription at any time and are given an effortless way of doing this. We may use your data for the following purposes:

- To enable us to process your orders with us
- To carry out our obligations arising from any contracts entered into between you and us
- To allow you to participate in interactive features of our service, when you choose to do so
- To allow you to participate in our competitions and promotions, when you choose to do so
- To notify you about changes to our service
- To share with third party processors where necessary and as detailed in this privacy notice and VirtualSignature-ID's Processor Privacy Code

### Types of personal information collected by VirtualSignature-ID

Identity checks are carried out by us on behalf of our clients and as such we need to collect certain information to provide this service. For the purposes of the General Data Protection Regulation as incorporated into UK law by the Data Protection Act 2018 (GDPR), it is our clients who are the controllers of your information and we are processors.

Some or all of the following information may be processed by us depending on which service or verification procedure our client has instructed us to carry out:

#### Contact information

Name

Address

Email address

Sex

Date of birth

Nationality

Associated Third Party information eg. family members

Passport information  
Driving license number  
Identity card number  
HR information  
PEP and Sanctions information  
Adverse media  
Bank details  
Company Director information  
Company ownership details

### **Obtaining and processing your information**

Our clients will pass your information to us once you have given them permission to do so for the purposes mutually agreed with them. You will receive a link so that you can submit your information to us and we use that information to carry out these checks.

We process this information for one or more of the following reasons:

Customer screening (Know Your Client “KYC” Checks)  
Anti Money-Laundering (“AML”) Checks  
Criminal record checks  
Right to work checks  
Right to rent checks  
Address verification  
Politically Exposed Person (PEP) & Sanction checks

We also receive personal information indirectly, from the following accredited third parties:

GB Group – Electoral register, National ID, criminal record data (via Cifas) and PEPs and Sanctions Data  
Equifax – Electoral register, Credit Header Information (no personal credit information is obtained)  
Halo – National Deceased Persons information  
Microsoft Azure – OCR Document Scanning Application  
Facetech Inc – 3D Biometric Liveness and Anti-spoofing check  
Lexis Nexus – International PEPs, Sanctions and Adverse Media Information

We occasionally may use other third party suppliers to process your information:

Klippa – ID Document templates  
Finexer – For open banking VirtualSignature-ID is using Finexer software as an agent of the principal Finexer (FCA #925695) authorised and regulated by the Financial Conduct Authority.

VirtualSignature-ID will perform the required checks and a summary of the results will be returned to the client. No data will be retained by VirtualSignature-ID and it is for VirtualSignature’s client to make any decisions as to whether to progress your application with them.

VirtualSignature-ID cannot be held liable for the information received from these third party agencies or for any decision made by our client as a result of the data they have supplied.

For more information concerning what constitutes our legal obligation under GDPR rules, please refer to Article 6.1b “Contractual Obligation” <https://gdpr.eu/article-6-how-to-process-personal-data-legally/>

### **Collection and Storage of Face Data**

As an ID Service Provider (IDSP) we may be required to collect your biometric face data for the purposes of matching such data to your identity document in order to verify your identity. We will only store biometric face data for the duration of the verification process, after which it will be deleted. However, it may be necessary for certain identification processing for the data to be retained for up to a maximum of 90 days. We will not hold this biometric face data beyond 90 days.

We do not usually need to share biometric face data with any third party. However, in the event that any such data is to be shared with a third party, it would only be for the purposes of continued processing of the data for identity verification purposes and it would be with your express consent. We would not share any data for any other purpose, such as analytics or marketing and we would always ensure that any third party provides the equivalent level of protection of that data, as stated in this Privacy Policy.

As stated in Section 16 of this document, you reserve the right to revoke consent and/or request deletion of any personal data, including biometric face data, where applicable.

### **How we use your information**

Under GDPR rules, VirtualSignature-ID is the data processor for the information you provide during the process unless otherwise stated. If you have any queries about the process or how we handle your information, you can do so by emailing us at [contactus@virtualsignature.com](mailto:contactus@virtualsignature.com)

All the information you provide during the process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements where necessary.

We will not share any of the information you provide during the process with any third parties for marketing purposes or store any of your information outside of the UK. The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format. We will use the contact details you provide to us to contact you to progress your application.

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary. You may be asked to digitally upload the following information via our secure portal or App for our ID verification and Biometric Face Recognition process to be completed:

- A valid ID document (Passport / Drivers Licence or ID Card)
- Proof of Address documentation
- Bank information

As a data processor, we will not divulge any personal data or information about you to a third-party without your prior written consent and any information we hold will only be retained for the purposes of the validation process. Any information obtained will not be held by us for more than 90 days from the beginning of the process.

## **Visitors to our websites**

When someone visits [www.virtualsignature.com](http://www.virtualsignature.com) we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be open about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

When you send a document through our electronic document exchange or connect to the world wide web, we keep a record of each transaction (including the IP address, date and time) to enable us to create a unique digital fingerprint and provide a complete audit trail and certificate.

We retain information about your use of our electronic document delivery, eSignature and personal identity service, which is used to manage our electronic document exchange, security and for accounting purposes. We may also use this information to help us enhance and improve our products and services to you.

We do not store credit card details, nor do we track your visits to any other websites or supply third party marketing agencies with your data.

## **Use of cookies by VirtualSignature-ID**

This site uses cookies. Cookies are small text files stored on your computer when you visit certain web pages. They are used to remember your preferences and in some cases your purchases from the website. We also use cookies that enable you to more easily share pages you like via social media sites like Facebook and Twitter. They are also used to collect anonymous data about your visit (like which areas of the site you visit and for how long) to help us improve your experience of our site and eliminate errors.

Cookies are not unsafe or in themselves a threat to your online privacy but recent legislation requires that website owners give as much information as possible about cookies used on a website and clear instructions how to refuse them, should you so choose. If you do choose not to allow cookies, please be aware that this site may not be fully functional.

## **Search engine and data storage**

Our search queries and results are logged anonymously to help us improve our website and search functionality. No user-specific data is collected by either VirtualSignature-ID or any third party.

The data that we collect from you is stored within the UK. It may also be processed by staff, operating outside the UK who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. However, your personal data would not be shared without your express permission.

## **E-newsletter**

We may from time to time use a third-party provider to deliver updates and e-newsletters. We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter.

## **Security and performance**

VirtualSignature-ID uses a third-party service to help maintain the security and performance of the VirtualSignature website. To deliver this service it processes the IP addresses of visitors to the VirtualSignature website.

## **Publications**

We may use a third-party service to publish blogs and other news items and may collect anonymous information about users' activity on the site, for example the number of users viewing pages on the site, to monitor and report on the effectiveness of the site and help us improve it.

## **People who contact us via social media**

If you send us a private or direct message via social media the message will be stored by the third-party media company. Any such messages will not be divulged by us to any other media or sales organisations.

## **People who call us**

When you call VirtualSignature-ID we collect Calling Line Identification (CLI) information. We use this information to help improve its efficiency and effectiveness.

## **People who email us**

We use industry standard encryption and protocol methods to protect email traffic. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

## **People who make a complaint to us**

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be

retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

### **Lawful bases for processing your data**

Under the Data Protection Act 2018 we have identified 'Explicit Consent' and the performance of a Contract as our lawful bases for processing your data

### **Your rights**

You have rights as an individual which you can exercise in relation to the information we hold about you such as your right to:

- Make a data protection complaint
- Be informed if your personal data is being used
- Get copies of your data
- Get your data corrected
- Get your data deleted
- Limit how organisations use your data
- Data portability
- Object to the use of your data
- Get information on decisions being made about you without human involvement

You can read more about these rights here – <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

### **Access to personal information**

VirtualSignature-ID tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 2018. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request about any personal information we may hold or if we do hold information about you that may be incorrect, you can write to us by addressing it to: The Data Controller, VirtualSignature-ID, Level 18, 40 Bank Street, Canary Wharf, London E14 5NR UK.

### **Links to other websites**

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

### **Changes to this privacy notice**

We keep our privacy notice under regular review. This privacy notice was last updated in January 2024.

### **How to contact us**

If you want to request information about our privacy policy, you can write to us at: VirtualSignature-ID, Level 18, 40 Bank Street, Canary Wharf, London E14 5NR