

Privacy Policy

artpass ID (“we,” “our,” or “us”) is committed to protecting your privacy. This Privacy Policy explains how your personal information is collected, used, and disclosed by artpass ID.

This Privacy Policy applies to our mobile application, our website, and its associated subdomains (collectively, our “Service”) alongside our application, artpass ID. By accessing or using our Service, you signify that you have read, understood, and agree to our collection, storage, use, and disclosure of your personal information as described in this Privacy Policy and our Terms of Service.

Definitions and key terms

To help explain things as clearly as possible in this Privacy Policy, every time any of these terms are referenced, are strictly defined as:

-**Cookie**: small amount of data generated by a website and saved by your web browser. It is used to identify your browser, provide analytics, remember information about you such as your language preference or login information.

-**Company**: when this policy mentions “Company,” “we,” “us,” or “our,” it refers to artpass ID, (71-75 Shelton Street London, WC2H 9JQ) that is responsible for your information under this Privacy Policy.

-**Country**: where artpass ID or the owners/founders of artpass ID are based, in this case is United Kingdom and Belgium

-**Customer**: refers to the company, organization or person that signs up to use the artpass ID Service to manage the relationships with your consumers or service users.

-**Device**: any internet connected device such as a phone, tablet, computer or any other device that can be used to visit artpass ID and use the services.

-**IP address**: Every device connected to the Internet is assigned a number known as an Internet protocol (IP) address. These numbers are usually assigned in geographic blocks. An IP address can often be used to identify the location from which a device is connecting to the Internet.

-**Personnel**: refers to those individuals who are employed by artpass ID or are under contract to perform a service on behalf of one of the parties.

-**Personal Data**: any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

-**Service**: refers to the service provided by artpass ID as described in the relative terms (if available) and on this platform.

-**Third-party service**: refers to advertisers, contest sponsors, promotional and marketing partners, and others who provide our content or whose products or services we think may interest you.

-**Website**: artpass ID's site, which can be accessed via this URL:
<https://artpass.id/>

-**You**: a person or entity that is registered with artpass ID to use the Services.

What Information Do We Collect?

We collect information from you when you visit our website, register on our site, engage in eIDV (Electronic Identity Verification), subscribe to our newsletter, respond to a survey or fill out a form. We use this information to create various digital identity reports for AML (Anti Money Laundering) purposes and to support the due diligence on art transactions. This may include:

- Name / Username
- Phone Numbers
- Email Addresses
- Mailing Addresses
- KYC (IDV & AML checks) on Director(s)/Officer(s) of a legal entity
- KYC (IDV & AML checks) on the Ultimate Beneficial Owners (UBO's) of a legal entity
- Billing Addresses
- Credit card number(s) for address verification and credit card validation

- Age / Date of Birth

- Password

We may also collect transactional information to support due diligence on art transactions including but not limited to:

- Image of the artwork, creator, title, dimensions, year created, materials, medium

- Provenance information

- Ownership information

- Payment method (source of funds)

- Ownership of funds used for purchase

- Capacity /authority to transact

The information we gather is stored as encrypted pdf files in our secure cloud storage servers.

The data we process differs depending on your interactions with us, as detailed more fully below. Please note that the data shared between members with non-members is beyond our control.

Where we act as a controller of personal data, the following items apply:

Details of the controller and data protection officer: the controller of the personal data we process is artpass ID Ltd, located at 71-75 Shelton Street, London, WC2H 9JQ, United Kingdom and which is registered with the UK Information Commissioner's Office under number ZA633666. Our data protection officer can be contacted by email at dpo@artpass.id.

TRANSFERS OUTSIDE OF THE EEA

As part of our group operations and to help us manage the personal data that We process, we transfer personal data of Users outside of the EEA subject to appropriate safeguards including European Commission adequacy decisions and model clauses approved by the European Commission on the basis of Art. 26(4) of Directive 95/46/EC.

YOUR RIGHTS

You can request that we correct, erase, or grant you access to the personal data we hold relating to you, or (where processing is based on your consent) withdraw your consent to our processing of your personal data. In many cases, the most effective way to exercise these rights will be to mail our dedicated inbox at dpo@artpass.id.

If you are concerned that we are handling your personal data improperly, you also have the right to make a complaint to our data protection regulator, the UK Information Commissioner's Office.

INFORMATION COLLECTION AND USE

The information we collect, and the ways in which we use it, varies in line with the use cases below:

- Visitors to artpass.id
- Candidates for jobs with artpass ID
- Our anti-money laundering, sanctions and adverse media data
- Business contacts

VISITORS TO ARTPASS.ID

When you browse this website

What we collect

Data on how you use the site

The pages you visit, the means you use to visit (browser version, time zone, operating system, etc.), how long your visit and pageviews last, the frequency of your visits, and information on how you navigate the site.

Data that identifies you

Your IP address, unique identifiers tied to cookies.

What we do with your data

Site optimisation

Analysing aggregated data to update our site's content and layout to improve relevance for visitors.

Our basis for processing this data

Legitimate interests

Using insights from visitor behaviour to improve the way we market our services.

How long we hold this data

Data holding periods are determined by cookie expiry times. However, data will not be retained for a period longer than the purpose for which it was obtained, not exceeding for UK and EU Users.

Recipients of data

Within artpass ID group companies

Personal information will be available for our global marketing teams, and other artpass ID personnel who have a need to access this data for the purposes set out above.

Outside of artpass ID

- CRM and marketing automation providers
- Website analytics vendors

Members of artpass ID

When you provide us with information by completing forms, subscribing for email updates

What we do with your data

We use this information to contact you for the purpose specified for the form and in any opt-in, boxes selected by you while completing.

This information is added to, and managed through, our CRM. A member of our sales team may contact you if we determine through your submission that you may be interested in our services. We analyse our CRM data to understand, track, and improve how we market and sell our services.

Our basis for processing this data

Consent

We'll send you our email newsletters only with your consent.

Taking steps at your request prior to entering into a contract

If you request that we contact you to provide more information on our services to you, we'll process your data and contact you on this basis.

Legitimate interests

We'll retain and analyse information gained from our interactions with you as part of understanding, tracking and improving how we market and sell our service. We retain some records of consent-based and other processing in order to demonstrate our historic compliance with data protection law.

How long we hold this data

Email newsletters

We'll keep your details on this list until you unsubscribe, at which point we'll move your details to an opted-out list to ensure that we don't send you marketing emails from other sources in future.

Sales process

We retain information relating to our sales interactions with you for up to five years following our determination that we're not an appropriate sales fit. We use this period as service contracts in our industry often last for 3-5 years, so a new opportunity may arise during the retention period.

General

We retain historic information relating to any consent you provided, or other bases for processing that have since lapsed, for six years from the date that the basis for processing lapsed.

Recipients of data

Within artpass ID group companies

Personal information will be available for our marketing and sales personnel, as well as customer success and other teams as necessary to fulfill the purposes set out above.

Outside of artpass ID

Our cloud storage providers, CRM, marketing

Job candidates

Recruitment information you provide to us

What we do with your data

We use your data to:

- contact you in relation to your candidacy
- assess suitability for future vacancies
- assess your suitability for the vacancy you applied for

Our basis for processing this data

Legitimate interests

We want to build the best team we can, and we carry out this processing as part of the hiring process that enables this.

Compliance with a legal obligation

For roles where we conduct a resident labour market test to enable us to apply for visas, and subsequently hire someone who needs a visa on this basis, we retain unsuccessful applicant information as part of the related record-keeping requirements.

How long we hold this data

General

Your information is stored in our applicant tracking system 12 months after we disqualify your candidacy for the role applied for. Successful candidates' information becomes subject to our employee privacy policy/notice.

Legal record-keeping

If we hire someone subject to a resident labour market test for a role you applied for, we'll retain your personal data until the expiry of the applicable record-keeping requirement (currently one year following the end of our sponsorship of the visa in question).

Recipients of data

Within artpass ID group companies

Personal information will be available for the hiring and recruitment teams.

Outside of artpass ID

- Our applicant tracking system
- Providers of any aptitude testing systems used as part of the hiring process

Members of artpass ID

Recruitment-related data we collect

The data we process

- Publicly available information relevant to your potential suitability to work with artpass ID Ltd
- Any information provided by someone who introduced you to us

- Feedback from interviews and assessments.

What we do with your data

We use your data to:

- contact you in relation to current vacancies
- For roles where we conduct a resident labour market test to enable us to apply for visas, and subsequently hire someone who needs a visa on this basis, we retain unsuccessful applicant information as part of the related record-keeping requirements.

Our basis for processing this data

Compliance with a legal obligation

If you are actively involved in a recruitment process for roles where we conduct a resident labour market test and subsequently hire someone who requires a sponsored visa, we retain unsuccessful applicant information as part of the related record-keeping requirements.

How long we hold the data

Your information is stored in our ATS 1 year after final interview if unsuccessful, or subject to our legal record-keeping requirements if needed for our compliance with immigration law.

How long we hold the data

Within artpass ID group companies

Personal information will be available for the hiring team and our recruitment personnel.

Outside of artpass ID

- Our applicant tracking system
- Providers of any aptitude testing systems used as part of the hiring process
- Our cloud file storage systems
- External recruiters with whom you dealt as part of the recruitment process
- Government and legal service providers involved in the visa application process

Our anti-money laundering, sanctions and adverse media data

The data we process

Sanctions, warnings, fitness & probity

Information related to and available on publicly-available government lists covering sanctions, the prevention and detection of unlawful acts, and other protective functions. This will generally include a full name, a year or date of birth, reasons for appearing on the list, and the period covered by the data subject's appearance on the list.

Politically exposed persons

We collect publicly available information relating to individuals in prominent public positions, and their family members, close associates, and business interests. Names, dates or years of birth, position(s) held or connection(s) that we think may give rise to a PEP designation, country of nationality, residence and service, photographs (if available) and the period for which that designation would have been active (e.g. active service dates).

Adverse media

We collect links to publicly available news articles that our systems determine to name individuals in connection with financial crime, terrorist financing, other relevant unlawful acts, improper conduct, dishonesty, etc. We will also extract information relating to age from these articles to determine approximate years of birth.

What we do with your data

Consolidated profiles

We structure the data collected into profiles consolidating the information outlined above.

Sharing with clients

Where one of our clients searches for a name on our database, we share with that customer any profiles that match the given search parameters.

Our basis for processing this data

Legitimate interests

Our existing and prospective clients have legitimate interests in gaining access to high-quality and easily manageable data of the type we process in order to optimize their sanctions and anti-money laundering compliance. We also pursue our own legitimate interests in develop and improve products and services to serve this market.

How long we hold the data

Politically exposed person data

Different jurisdictions' regulations vary on how they treat politically exposed persons (PEPs) after they leave office. As some of the jurisdictions that we serve consider a PEP to always be a PEP, we retain this information indefinitely.

Backups

Where we remove personal data from this database (for example, where we become aware that the information is not, or is no longer, relevant), it will remain in our backups for 30 days.

Recipients of data

- Other data controllers on whose behalf we act as processors, who search for information matching given profiles
- artpass ID Ltd group employees
- Our hosting and cloud storage providers
- Vendors we use to monitor the accuracy and performance of the data
- Members of artpass ID

Business contacts

Information we receive from you (e.g. business cards, correspondence during the sales process)

What we do with your data

A member of our sales team may contact you if we determine through your submission that you may be interested in our services. This information – along with details of our interactions including phone calls and correspondence – is added to, and managed through, our CRM. We analyse our CRM data to understand, track, and improve how we market and sell our services. We save some correspondence to provide precedents and examples to other members of the team, and add your personal information to our e-signing and billing systems if appropriate.

Our basis for processing this data

Taking steps at your request prior to entering into a contract

If you request that we contact you to provide more information on our services to you, we'll process your data and contact you on this basis.

Legitimate interests

We'll retain and analyse information gained from our interactions with you as part of understanding, tracking and improving how we market and sell our services.

We process data in relation to billing and contracting in order to operate the legal and financial elements of our business.

We retain records of consent-based and other processing in order to demonstrate our historic compliance with data protection law.

How long we hold the data

Email newsletters

We'll keep your details on this list until you unsubscribe, at which point we'll move your details to an opted-out list to ensure that we don't send you marketing emails from other sources in future.

Sales process

We retain information relating to our sales interactions with you for up to five years following our determination that we're not an appropriate sales fit. We use this period as service contracts in our industry often last for 3-5 years, so a new opportunity may arise during the retention period.

General

We retain historic information relating to any consent you provided, or other bases for processing that have since lapsed, for six years from the date that the basis for processing lapsed.

Recipients of data

Within artpass ID group companies

Personal information will be available for our marketing and sales personnel, as well as customer success and other teams as necessary to fulfil the purposes set out above.

Outside of artpass ID

Our cloud storage providers, CRM, sales and marketing automation tools, and customer support/servicing tools.

Members of artpass ID

Automated Processing

We use automated systems to analyse your information to help us make fair and objective decisions about whether .

When does artpass ID use end user information from third parties?

artpass ID will collect ID information and additional information to create your own CDD (Customer Due Diligence) Reports necessary to provide trust and AML compliance the other artpass ID members you interact with.

End users may also voluntarily provide us with information they have made available on social media websites. If you provide us with any such information, we may collect publicly available information from the social media websites you have indicated. You can control how much of your information social media websites make public by visiting these websites and changing your privacy settings.

When does artpass ID use customer information from third parties?

We receive some information from the third parties when you contact us. For example, when you submit ID to create your artpass ID CDD Report, we receive information from third parties that provides automated ID verification, anti-money laundering checks (AML) and fraud detection services to artpass ID. We also disclose information that is made publicly available on your social media website that you provide us. You can control how much of your information social media websites make public by visiting these websites and changing your privacy settings.

Do we share the information we collect with third parties?

We may share the information that we collect, both personal and non-personal, with third parties such as advertisers, contest sponsors, promotional and marketing partners, and others who provide our content or whose products or services we think may interest you. We may also share it with our

current and future affiliated companies and business partners, and if we are involved in a merger, asset sale or other business reorganization, we may also share or transfer your personal and non-personal information to our successors-in-interest.

We may engage trusted third-party service providers to perform functions and provide services to us, such as hosting and maintaining our servers and the website, database storage and management, e-mail management, storage marketing, credit card processing, customer service and fulfilling orders for products and services you may purchase through the website. We will likely share your personal information, and possibly some non-personal information, with these third parties to enable them to perform these services for us and for you.

We may share portions of our log file data, including IP addresses, for analytics purposes with third parties such as web analytics partners, application developers, and ad networks. If your IP address is shared, it may be used to estimate general location and other technographics such as connection speed, whether you have visited the website in a shared location, and type of the device used to visit the website. They may aggregate information about our advertising and what you see on the website and then provide auditing, research and reporting for us and our advertisers.

We may also disclose personal and non-personal information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate in order to respond to claims, legal process (including subpoenas), to protect our rights and interests or those of a third party, the safety of the public or any person, to prevent or stop any illegal, unethical, or legally actionable activity, or to otherwise comply with applicable court orders, laws, rules and regulations.

Where and when is information collected from customers and end users?

artpass ID will collect personal information that you submit to us. We may also receive personal information about you from third parties as described above.How Do We Use Your Email Address?

By submitting your email address on this website, you agree to receive emails from us. You can cancel your participation in any of these email lists at any time by clicking on the opt-out link or other unsubscribe option that is included in the respective email. We only send emails to people who have authorized us

to contact them, either directly, or through a third party. We do not send unsolicited commercial emails, because we hate spam as much as you do. Email addresses submitted only through the profile creation during sign up will be used for the sole purpose of sending you information and updates pertaining to your order. If, however, you have provided the same email to us through another method, we may use it for any of the purposes stated in this Policy. Note: If at any time you would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email.

How Do We Protect Your Information?

We implement a variety of security measures to maintain the safety of your personal information when you place an order or enter, submit, or access your personal information. We offer the use of a secure server. All supplied sensitive/credit information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our Payment gateway providers database only to be accessible by those authorized with special access rights to such systems, and are required to keep the information confidential. After a transaction, your private information (credit cards, social security numbers, financials, etc.) is never kept on file. We cannot, however, ensure or warrant the absolute security of any information you transmit to artpass ID or guarantee that your information on the Service may not be accessed, disclosed, altered, or destroyed by a breach of any of our physical, technical, or managerial safeguards.

Could my information be transferred to other countries?

artpass ID is incorporated in United Kingdom. Information collected via our website, through direct interactions with you, or from use of our help services may be transferred from time to time to our offices or personnel, or to third parties, located throughout the world, and may be viewed and hosted anywhere in the world, including countries that may not have laws of general applicability regulating the use and transfer of such data. To the fullest extent allowed by applicable law, by using any of the above, you voluntarily consent to the trans-border transfer and hosting of such information.

Is the information collected through the artpass ID Service secure?

We take precautions to protect the security of your information. We have physical, electronic, and managerial procedures to help safeguard, prevent unauthorized access, maintain data security, and correctly use your information. However, neither people nor security systems are foolproof, including encryption systems. In addition, people can commit intentional crimes, make mistakes or fail to follow policies. Therefore, while we use reasonable efforts to protect your personal information, we cannot guarantee its absolute security. If applicable law imposes any non-disclaimable duty to protect your personal information, you agree that intentional misconduct will be the standards used to measure our compliance with that duty.

Can I update or correct my information?

The rights you have to request updates or corrections to the information artpass ID collects depend on your relationship with artpass ID. Personnel may update or correct their information as detailed in our internal company employment policies.

Customers have the right to request the restriction of certain uses and disclosures of personally identifiable information as follows. You can contact us in order to (1) update or correct your personally identifiable information, (2) change your preferences with respect to communications and other information you receive from us, or (3) delete the personally identifiable information maintained about you on our systems (subject to the following paragraph), by cancelling your account. Such updates, corrections, changes and deletions will have no effect on other information that we maintain, or information that we have provided to third parties in accordance with this Privacy Policy prior to such update, correction, change or deletion. To protect your privacy and security, we may take reasonable steps (such as requesting a unique password) to verify your identity before granting you profile access or making corrections. You are responsible for maintaining the secrecy of your unique password and account information at all times.

You should be aware that it is not technologically possible to remove each and every record of the information you have provided to us from our system. The need to back up our systems to protect information from inadvertent loss means that a copy of your information may exist in a non-erasable form that will be difficult or impossible for us to locate. Promptly after receiving your request, all personal information stored in databases we actively use, and other readily searchable media will be updated, corrected, changed or deleted, as appropriate, as soon as and to the extent reasonably and technically practicable.

If you are an end user and wish to update, delete, or receive any information we have about you, you may do so by contacting the organization of which you are a customer.

Personnel

If you are an artpass ID worker or applicant, we collect information you voluntarily provide to us. We use the information collected for Human Resources purposes in order to administer benefits to workers and screen applicants.

You may contact us in order to (1) update or correct your information, (2) change your preferences with respect to communications and other information you receive from us, or (3) receive a record of the information we have relating to you. Such updates, corrections, changes and deletions will have no effect on other information that we maintain, or information that we have provided to third parties in accordance with this Privacy Policy prior to such update, correction, change or deletion.

Sale of Business

We reserve the right to transfer information to a third party in the event of a sale, merger or other transfer of all or substantially all of the assets of artpass ID or any of its Corporate Affiliates (as defined herein), or that portion of artpass ID or any of its Corporate Affiliates to which the Service relates, or in the event that we discontinue our business or file a petition or have filed against us a petition in bankruptcy, reorganization or similar proceeding, provided that the third party agrees to adhere to the terms of this Privacy Policy.

Affiliates

We may disclose information (including personal information) about you to our Corporate Affiliates. For purposes of this Privacy Policy, "Corporate Affiliate" means any person or entity which directly or indirectly controls, is controlled by or is under common control with artpass ID, whether by ownership or otherwise. Any information relating to you that we provide to our Corporate Affiliates will be treated by those Corporate Affiliates in accordance with the terms of this Privacy Policy.

Governing Law

This Privacy Policy is governed by the laws of United Kingdom without regard to its conflict of laws provision. You consent to the exclusive jurisdiction of the courts in connection with any action or dispute arising between the parties under or in connection with this Privacy Policy except for those individuals who may have rights to make claims under Privacy Shield, or the Swiss-US framework.

The laws of United Kingdom, excluding its conflicts of law rules, shall govern this Agreement and your use of the website. Your use of the website may also be subject to other local, state, national, or international laws.

By using artpass ID or contacting us directly, you signify your acceptance of this Privacy Policy. If you do not agree to this Privacy Policy, you should not engage with our website, or use our services. Continued use of the website, direct engagement with us, or following the posting of changes to this Privacy Policy that do not significantly affect the use or disclosure of your personal information will mean that you accept those changes.

Your Consent

We've updated our Privacy Policy to provide you with complete transparency into what is being set when you visit our site and how it's being used. By using our website, registering an account, or making a purchase, you hereby consent to our Privacy Policy and agree to its terms.

Links to Other Websites

This Privacy Policy applies only to the Services. The Services may contain links to other websites not operated or controlled by artpass ID. We are not responsible for the content, accuracy or opinions expressed in such websites, and such websites are not investigated, monitored or checked for accuracy or completeness by us. Please remember that when you use a link to go from the Services to another website, our Privacy Policy is no longer in effect. Your browsing and interaction on any other website, including those that have a link on our platform, is subject to that website's own rules and policies. Such third parties may use their own cookies or other methods to collect information about you.

Cookies

Please see our Cookie Policy screen for complete information at:
https://artpass.id/cookie_policy.html

Payment Details

In respect to any credit card or other payment processing details you have provided us, we commit that this confidential information will be stored in the most secure manner possible.

Kids' Privacy

We do not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, we take steps to remove that information from Our servers.

Changes To Our Privacy Policy

We may change our Service and policies, and we may need to make changes to this Privacy Policy so that they accurately reflect our Service and policies. Unless otherwise required by law, we will notify you (for example, through our Service) before we make changes to this Privacy Policy and give you an opportunity to review them before they go into effect. Then, if you continue to use the Service, you will be bound by the updated Privacy Policy. If you do not want to agree to this or any updated Privacy Policy, you can delete your account.

Third-Party Services

We may display, include or make available third-party content (including data, information, applications and other products services) or provide links to third-party websites or services ("Third- Party Services"). You acknowledge and agree that artpass ID shall not be responsible for any Third-Party Services, including their accuracy, completeness, timeliness, validity, AML compliance, ID verification, copyright compliance, legality, decency, quality or any other aspect thereof. artpass ID does not assume and shall not have any liability or responsibility to you or any other person or entity for any Third-Party Services. Third-Party Services and links thereto are provided solely as a convenience to you and you access and use them entirely at your own risk and subject to such third parties' terms and conditions.

Information about General Data Protection Regulation (GDPR)

We may be collecting and using information from you if you are from the European Economic Area (EEA), and in this section of our Privacy Policy we are going to explain exactly how and why is this data collected, and how we maintain this data under protection from being replicated or used in the wrong way.

What is GDPR?

GDPR is an EU-wide privacy and data protection law that regulates how EU residents' data is protected by companies and enhances the control the EU residents have, over their personal data.

The GDPR is relevant to any globally operating company and not just the EU-based businesses and EU residents. Our customers' data is important irrespective of where they are located, which is why we have implemented GDPR controls as our baseline standard for all our operations worldwide.

What is personal data?

Any data that relates to an identifiable or identified individual. GDPR covers a broad spectrum of information that could be used on its own, or in combination with other pieces of information, to identify a person. Personal data extends beyond a person's name or email address. Some examples include financial information, political opinions, genetic data, biometric data, IP addresses, physical address, sexual orientation, and ethnicity.

The Data Protection Principles include requirements such as:

- Personal data collected must be processed in a fair, legal, and transparent way and should only be used in a way that a person would reasonably expect.
- Personal data should only be collected to fulfil a specific purpose and it should only be used for that purpose. Organizations must specify why they need the personal data when they collect it.
- Personal data should be held no longer than necessary to fulfil its purpose.
- People covered by the GDPR have the right to access their own personal data. They can also request a copy of their data, and that their data be updated, deleted, restricted, or moved to another organization.

Why is GDPR important?

GDPR adds some new requirements regarding how companies should protect individuals' personal data that they collect and process. It also raises the stakes for compliance by increasing enforcement and imposing greater fines for breach. Beyond these facts it's simply the right thing to do. At Help Scout we strongly believe that your data privacy is very important and we already have solid security and privacy practices in place that go beyond the requirements of this new regulation.

Individual Data Subject's Rights - Data Access, Portability and Deletion

We are committed to helping our customers meet the data subject rights requirements of GDPR. artpass ID processes or stores all personal data in fully vetted, DPA compliant vendors. We do store all conversation and personal data for up to 6 years unless your account is deleted. In which case, we dispose of all data in accordance with our Terms of Service and Privacy Policy, but we will not hold it longer than 60 days.

We are aware that if you are working with EU customers, you need to be able to provide them with the ability to access, update, retrieve and remove personal data. We got you! We've been set up as self-service from the start and have always given you access to your data and your customers data. Our customer support team is here for you to answer any questions you might have about working with the API.

California Residents

The California Consumer Privacy Act (CCPA) requires us to disclose categories of Personal Information we collect and how we use it, the categories of sources from whom we collect Personal Information, and the third parties with whom we share it, which we have explained above.

We are also required to communicate information about rights California residents have under California law. You may exercise the following rights:

-Right to Know and Access. You may submit a verifiable request for information regarding the: (1) categories of Personal Information we collect, use, or share; (2) purposes for which categories of Personal Information are collected or used by us; (3) categories of sources from which we collect

Personal Information; and (4) specific pieces of Personal Information we have collected about you.

-Right to Equal Service. We will not discriminate against you if you exercise your privacy rights.

-Right to Delete. You may submit a verifiable request to close your account and we will delete Personal Information about you that we have collected.

-Request that a business that sells a consumer's personal data, not sell the consumer's personal data.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us. We do not sell the Personal Information of our users. For more information about these rights, please contact us.

Contact Us

-Via Email: hello@artpass.id

-Via Phone Number: +44 77 2740 7318

-Via this Link: <http://artpass.id/>

-Via this Address: 71-75 Shelton Street London, WC2H 9JQ United Kingdom

Your rights

You have a number of legal rights in relation to the information that we hold about you, including:

- The right to request details of the information we have about you.
- The right to withdraw your consent to the use of your information where we are relying on that consent (for example, you can opt out of receiving marketing messages from us). Please note that we may still be entitled to process your information if we have another legitimate reason (other than consent) for doing so.
- In some circumstances, you have the right to receive some of your information in a usable format and/or request we transmit that data to a third party where this is technically feasible. Please note that this right only applies to information which you have provided to us.
- The right to ask that we update your information if it is inaccurate or incomplete.

- The right to ask that we erase your information in certain circumstances. Please note that there may be circumstances where you ask us to erase your information but we are legally entitled to retain it.
- The right to request that we restrict the processing of your information in certain circumstances. Again, there may be circumstances where you ask us to restrict the processing of your information, but we are legally entitled to refuse that request.
- The right to make a complaint with the Information Commissioner www.ico.org.uk if you think that any of your rights have been infringed by us.

You can exercise your right by emailing us or you can speed up the process by using this form to access your data and this form to exercise your other rights. You'll need to include some proof of identification. Email your Data Rights request to hello@artpass.id or, if you prefer, you can write to us at: 71-75 Shelton Street London, WC2H 9JQ United Kingdom. Don't forget to include your form, if you choose to fill one out.

Disclaimer (separate at the moment)

artpass ID hereby grants you access to <https://artpass.id/> ("the Website") and invites you to subscribe to the services offered here.

Definitions and key terms

To help explain things as clearly as possible in this Disclaimer, every time any of these terms are referenced, are strictly defined as:

-Cookie: small amount of data generated by a website and saved by your web browser. It is used to identify your browser, provide analytics, remember information about you such as your language preference or login information.

-Company: when this policy mentions "Company," "we," "us," or "our," it refers to artpass ID Ltd., (71-75 Shelton Street London, WC2H 9JQ) that is responsible for your information under this Disclaimer.

-Service: refers to the service provided by artpass ID as described in the relative terms (if available) and on this platform.

-Website: artpass ID."s" site, which can be accessed via this URL:
<https://artpass.id/>

-iOS App: artpass ID."s" mobile App, which can be downloaded via this URL:
<https://apps.apple.com/us/app/artpass-id/id1497860703>

-You: a person or entity that is registered with artpass ID to use the Services.

Limited liability

artpass ID endeavours to update and/or supplement the content of the website on a regular basis. Despite our care and attention, content may be incomplete and/or incorrect.

The materials offered on the website are offered without any form of guarantee or claim to their correctness. These materials can be changed at any time without prior notice from artpass ID.

Particularly, all prices on the website are stated subject to typing and programming errors. No liability is assumed for the implications of such errors. No agreement is concluded on the basis of such errors.

artpass ID shall not bear any liability for hyperlinks to websites or services of third parties included on the website. From our website, you can visit other websites by following hyperlinks to such external sites. While we strive to provide only quality links to useful and ethical websites, we have no control over the content and nature of these sites. These links to other websites do not imply a recommendation for all the content found on these sites. Site owners and content may change without notice and may occur before we have the opportunity to remove a link which may have gone 'bad'.

Please be also aware that when you leave our website, other sites may have different privacy policies and terms which are beyond our control. Please be sure to check the Privacy Policies of these sites as well as their "Terms of Service" before engaging in any business or uploading any information.

Legal Disclosure

The materials, any comments or information provided by artpass ID are for educational purposes only and nothing conveyed or provided should be considered legal, accounting or tax advice. You are responsible for whatever you may do with the information you obtain from artpass ID. As such, by visiting and using this website you acknowledge and agree that you have been assessed by a qualified law expert (i.e your attorney) who has given you consent to take part in any legal activity. Please contact your own attorney, accountant or tax professional with any specific questions you have related to the information provided that are of legal, accounting or tax nature.

Testimonials Disclosure

Any testimonials provided on this platform are opinions of those providing them. The information provided in the testimonials is not to be relied upon to predict results in your specific situation. The results you experience will be dependent on many factors including but not limited to your level of personal responsibility, commitment, and abilities, in addition to those factors that you and/or artpass ID may not be able to anticipate.

We will give honest testimonials to our visitors regardless of any discount. Any product or service that we test are individual experiences, reflecting real life experiences. The testimonials could be displayed on audio, text or video and are not necessarily representative of all of those who will use our products and/or services.

artpass ID does not guarantee the same results as the testimonials given on our platform. Testimonials presented on artpass ID are applicable to the

individuals writing them, and may not be indicative of future success of any other individuals.

Your Consent

We've updated our Disclaimer to provide you with complete transparency into what is being set when you visit our site or use our mobile app and how it's being used. By using our website, registering an account, or making a purchase, you hereby consent to our Disclaimer and agree to its terms.

Changes To Our Disclaimer

Should we update, amend or make any changes to this document so that they accurately reflect our Service and policies. Unless otherwise required by law, those changes will be prominently posted here. Then, if you continue to use the Service, you will be bound by the updated Disclaimer. If you do not want to agree to this or any updated Disclaimer, you can delete your account.

Contact Us

Don't hesitate to contact us if you have any questions regarding this Disclaimer.

-Via Email: hello@artpass.id

-Via Phone Number: +44 77 2740 7318

-Via this Link: <https://artpass.id/>

-Via this Address: 71-75 Shelton Street London, WC2H 9JQ United Kingdom