



IFX Biometric Data Consent and Policy

This policy applies if we collect biometric data from you.



PAYMENTS

Welcome to IFX (UK) Ltd's ("IFX", "we", "us" or "our") Biometric Data Consent and policy ("Consent"). This should be read in conjunction with the IFX Privacy Policy and the other IFX terms and conditions provided to you.

CONSENT

This Consent sets out why and how we collect and use Biometric Data. We must obtain your consent to collect and use your Biometric Data as it is a "special category" of personal data. You will be asked to accept this Consent and if you do so, this will mean that you consent to the collection, use and disclosure of your Biometric Data as described below.

If you wish to withdraw your consent, please notify us by emailing regulatory@ifxpayments.com. There may be circumstances where your consent may not be revoked. This could be where IFX requires the Biometric Data:

- in anticipation of or in connection with a transaction we are completing for you;
- to complete the provision of certain services;
- for security purposes; and/or
- for legal and regulatory purposes (including to comply with our anti-money laundering or fraud prevention obligations).

If we decline your request, it will be on the basis that retaining the Biometric Data is reasonably necessary and proportionate for those purposes.

If you revoke or decline your consent, we may suspend or terminate the use of our services. There will be no requirement for us to provide and/or continue to provide services to you if you have revoked or declined your consent and we deem it necessary to hold your Biometric Data in order to provide those services, or to satisfy our legal or regulatory obligations.

You can submit a request to access, correct or delete your Biometric Data by contacting us at regulatory@ifxpayments.com. We will respond to the request promptly within the time frame and in the form required by applicable law.

THE BIOMETRIC DATA WE COLLECT, USE AND DISCLOSE

Biometric Data is a form of information related to your biometric characteristics which may be used to identify you. We may request your facial biometrics in order for you to use our services and/or to continue to use our services. This means that we may require you to upload a "selfie" of yourself using your mobile or other device. You may also be asked to hold a copy of certain of your identification documents in the "selfie". If we request Biometric Data from you, it is because we have deemed it necessary and proportionate in the circumstances. In particular, we use these images for purposes of identity verification and to prevent fraudulent activity.

We may use your Biometric Data as follows:

- to verify your identity when you are opening an account or using our services;
- to authenticate use of your account and use of our services from time to time;
- to prevent fraudulent uses of our services;
- to comply with legal and regulatory obligations; and/or
- to comply with a request from law enforcement or government entities.

We may share or disclose your Biometric Data in the following circumstances:

- to our banking partners as required for the provision of our services to you, such as processing a payment or for compliance reasons;
- to third party service providers that provide services or perform functions on our behalf necessary to provide our services to you. These service providers are limited to using the Biometric Data to provide those services and functions, and to maintain such Biometric Data in a secure fashion consistent with this Consent; and/or
- to other third parties where permitted by law, to enforce our terms and conditions, to comply with legal obligations or applicable, to respond to legal process, to cooperate with law enforcement agencies concerning conduct or activity that we reasonably believe may violate laws and regulations, and to prevent harm or loss to others.

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STORAGE

We will store your Biometric Data as long as you have an active account with us and/or are in receipt of our services.

After you close your account or stop using the services, we may retain your Biometric Data for up to six years to comply with legal, contractual, fraud prevention and policy obligations.

We will use a reasonable care standard in accordance with industry standards to protect your Biometric Data against unauthorised access, accidental change or deletion and hacking attempts.

MODIFICATION

We reserve the right to change or modify this Consent at any time. If we make material changes, we will notify you here, by email, or by means of notice on our home page. Such changes are binding on you if you continue to use the services after such notice is provided, but we will provide you the opportunity to give your consent and/or withdraw your consent before the changes take effect.