



Yoti External Applications privacy and cookies policy

Last updated on: 7 June 2018

Organisations: In this policy, we set out all the information you need on how we will handle your personal information when you set up your organisation with a Yoti account.

Individuals: In this policy, we set out all the information you need on how we will handle your personal information when you share your Yoti information with one of our external applications.

This policy covers the following products.

- MyVenue 4 Business
- MyVenue 4 Clubs

As transparency and privacy are core values, we regularly check and update this policy to reflect new features and functionality. Regularly reviewing this policy makes sure that you are always aware of what information we collect, how we use it and how we might share it.

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Who we are

We are Yoti External Applications Ltd (a sister company of Yoti Ltd), Fountain House, 130 Fenchurch Street, London, EC3M 5DJ (company number 09621742), but you can call us '**Yoti External Apps**'. Our general email address is hello@yoti.com. Where we say 'we' and 'us' we mean Yoti. Where we say 'third party' this means anyone who is not you or us. This could be another person or an organisation.

Our principles

As a sister company of Yoti Ltd, we aim to be as privacy-friendly as we can. We are deliberately set up as a separate company to be able to develop applications that use the Yoti platform, but that are not improvements or additions to the core Yoti identity and attribute product. This allows us more flexibility in how we store, use and provide access to personal information. We need this

flexibility to develop applications that are useful and provide convenience to individuals and organisations, but that require different storage, uses and access to personal information.

We are monitored by a Guardian Council, who are respected and influential individuals who make sure that Yoti always seeks to do the right thing, and that we are transparent about what we are doing and why. Read more about them here:

<https://www.yoti.com/about/council/#about-navbar>.

We are also certified as a B Corp company, meaning that we consider the impact of our decisions on employees, consumers, the community and the environment. Read more about it here: <https://www.bcorporation.net/>.

Information collection and use

[MyVenue 4 Business](#)

This provides identity and access management services to companies so that customers and visitors can use Yoti as part of a digital visitor registration process. This allows for verified identification of visitors and speeds up the sign-in process, and removes the need to collect and store documents for proof of ID.

[MyVenue 4 Clubs](#)

This provides identity and access management services to companies so that customers and visitors can use Yoti to access venues and provide verified identification information. This removes the need to collect and store documents for proof of ID.

MyVenue 4 Business

Organisations: what personal information do we collect from you, and what do we do with it?

What we collect	What we do with it
Company contact details Administrator contact details List of your employees or event attendees (that you upload) Devices you add	To set up your account. To administer your account and provide the service to you. To contact you with service updates and information. To monitor use of our products. To provide customer support services. We create anonymous and aggregate statistics on how our product is being used. We delete the information six months after you delete your account.
Visitors logging in with Yoti Name, photo, person they are visiting Date and time of visit	Yoti External Apps stores the visitor data for you. We keep it for one year from the collection date.

Visitors logging in without Yoti Name, email address, person they are visiting Date and time of visit	Yoti External Apps stores the visitor data for you. We keep it for one year from the collection date. Yoti External Apps uses the email if the individual opts into getting visitor receipts and / or e-mails about Yoti products and services.
If you add a disclaimer the individual has to agree to	We keep the information for four years instead.

Individuals: what personal information do we collect from you, and what do we do with it?

What we collect	What we do with it
Login with Yoti: Name, photo, person you are visiting	Yoti External Apps stores the visitor data for the company. We keep it for one year from the collection date.
Login without Yoti: Name, email address, person you are visiting	Yoti External Apps stores the visitor data for the company. We keep it for one year from the collection date. Yoti External Apps uses your email if you opt into getting visitor receipts and / or e-mails about our products and services.
If the organisation requires you to sign a disclaimer	We keep the information for four years instead.

MyVenue 4 Clubs

Organisations: what personal information do we collect from you, and what do we do with it?

What we collect	What we do with it
Company contact details Administrator contact details Venue and manager details	To set up your account. To administer your account and provide the service to you. To contact you with service updates and information. To monitor use of our products. To provide customer support services. We create anonymous and aggregate statistics on how our product is being used. We delete the information six months after you delete your account.

<p>Visitors to your venue Name, age, photo, gender Optional fields you add Date and time of visit</p>	<p>Yoti External Apps stores the visitor data for you. We keep it for one year from the collection date.</p>
<p>Watchlist information</p>	<p>Yoti External Apps stores the visitor data for you.</p> <p>We also provide a facility for you to run reports on your venue data. We keep it for one year from the collection date.</p>

Individuals: what personal information do we collect from you, and what do we do with it?

What we collect	What we do with it
<p>To gain entry to the venue: Photo, name, date of birth, gender Date and time of visit Up to two additional optional fields if selected by the venue.</p>	<p>To facilitate the sharing of this information with the venue, in line with their access policy.</p> <p>We do not share your date of birth: we show the venue an 18+ attribute if you are over 18, and only your age is stored.</p> <p>Yoti External Apps stores the visitor data for the venue. We do not access it unless to provide customer support services for the venue or to administer their account. We keep the information for one year from the collection date.</p> <p>We also provide a facility for the venue to run reports on their venue data.</p>
<p>Information relating to any offences and periods of time you are banned from a venue (provided by the venue)</p>	<p>As part of the identity and access management service to participating nightclubs, we host a national watchlist so nightclubs can flag individuals they have banned from their premises for specific periods of time for specific offences. Participating venues should notify you if they want to include you on this watchlist.</p> <p>The venue may choose to share this information with other venues.</p> <p>We keep the information for one year from the collection date.</p>

Information sharing

Users decide when they want to use their Yoti to identify themselves to a third party who is using a Yoti External Apps identity and access management service or Yoti Connections. Users choose whether to agree or not to share the information the third party requests.

When users share information with a third party, the information is also shared with Yoti External Apps.

Yoti creates and encrypts a master receipt which contains the details of the sharing transaction for both parties. This master receipt is securely stored on our servers and we cannot access or view it unless either you or the third party provides us with their own receipt containing the encryption key needed to access the information.

Other companies' use of user personal information

If you choose to share your information with a third party using Yoti External Apps, those third parties may choose to use that information to communicate with you or they may share that information with others. We advise you to read the privacy notices of any company you share your information with to understand how they will use your personal information.

Yoti External Apps access to information

When a user shares personal information with a company using a Yoti External Apps product, we store your details securely in separate databases.

Yoti External Apps are able to access certain information as set out below, and we encourage users to read the privacy notices the company provides about their uses of your personal information.

MyVenue 4 Business

- Anonymised numbers on visits
- List of administrators
- Visitor registration devices
- Registered location of devices
- Exportable anonymised data to a CSV file

MyVenue 4 Clubs

- Anonymised numbers on visits
- Exportable anonymised data to a CSV file

Yoti External Apps has access controls in place to limit which staff have access to the server. Our staff may need access to troubleshoot problems and manage the server in emergency events.

When Yoti External Apps shares personal information

<p>If we suspect identity fraud, a national security threat, legal infringement, or a criminal offence</p>	<p>We may have to share a copy of your information with the appropriate authorities.</p>
<p>If you provide false or inaccurate information</p>	<p>If, after investigation, we determine that there has been fraud that meets the criteria for reporting, we will pass the details to relevant crime and fraud prevention agencies to prevent further fraud and money laundering.</p> <p>You can get more information about our approach to fraud and misuse and explaining how the crime and fraud prevention agencies will use the information by emailing privacy@yoti.com.</p>
<p>If we get a request for user information from a law enforcement or other official authority for information relating to organisations or individuals in relation to the use of a Yoti External Apps product</p>	<p>We will follow our internal policy and procedure. This involves us checking whether the request is valid and proportionate, and deciding whether to share it voluntarily or to require the entity making the request to get a court order to compel us to provide it.</p> <p>For information requests relating to Yoti users. in some cases we may need to direct the entity making the request to the organisation who used our services and to which the user identified themselves (such as the club venue or office).</p>
<p>We may use the services of other businesses to help us in certain areas, for example, for data storage; online payment providers; and identity providers who we use to help with identity verification</p>	<p>Because of how we have designed the system, in most situations we won't need to share your information with third parties.</p> <p>If we do, we will encrypt your data and / or it will be properly protected by the terms of our contract with these third parties.</p>
<p>If Yoti External Apps sells its assets</p>	<p>Yoti will only agree to the sale if the new business commits to the core Yoti principles of data privacy.</p> <p>While we are negotiating with the company buying or combining Yoti with their own business, they won't be able to access your encrypted personal information but Yoti may provide anonymised statistical information.</p>

Security

We take the security of your personal information very seriously. We store your personal information in secure infrastructure. We use encryption and other physical security measures to store and transfer your information.

Sending your personal information to other countries

We currently store your personal information in Amazon Web Services EU data centres.

In future we may send your personal information to countries outside the EEA (this is the EU plus Switzerland, Iceland, Liechtenstein and Norway). If we send your personal information to any other countries (for example, we may have other databases and servers in other countries) some of these countries may not have equivalent laws on handling personal information. However, we will make sure that your personal information is properly protected.

In some countries, for regulatory or practical reasons, Yoti may be required to store personal data on local servers.

When we decide to transfer or store your personal information in another country, we will update this section to describe the safeguards we have put in place.

Individuals: You should be aware that if you choose to use your Yoti to identify yourself to a third party who is using our identity access and management services, then that third party could transfer your personal information outside the EEA. Please read their privacy policy for this information.

Your rights and choices

The user's Yoti account shows all their personal information and information on shares done using Yoti External Apps products.

In some cases Yoti External Apps may only be acting on behalf of the company using our products.

Access rights

You are entitled to see the personal information we hold about you.

Organisations: If you submitted personal information as part of setting up your organisation's account, you can request a copy of this information from us by emailing privacy@yoti.com.

Individuals: You can request a copy of your personal information by e-mailing privacy@yoti.com. You may need to make your request to the third party you identified yourself to, as Yoti External Apps may just be acting on their behalf to provide the service and store the data. We will advise you if this is the case. Where we are in a position to access and provide personal information you have shared through a Yoti External Apps service, we will do so within 30 days at no charge.

You can also access the personal information you have shared through our service as it is contained in your receipts.

Correction rights

You are entitled to correct personal information we hold about you that is not accurate. If you think that any of the information in your Yoti account is not accurate, you can update it at any time through your account. Yoti only has access to the information in your account for up to seven days after it is first provided to Yoti.

Individuals: If you think that Yoti External Apps has any inaccurate information about you that relates to your interactions with third parties who are using the Yoti External Apps services, please email privacy@yoti.com.

Deletion rights

In certain circumstances you are entitled to ask us to delete the personal information we hold about you. If you want Yoti External Apps to delete any personal information it hold about you, please email: privacy@yoti.com

Organisations: If you want to close your account and delete your information, click 'delete account' button. The account will be in 'holding' for five days (in case you change your mind). After that period, we archive the data for six months and then delete the account and all the data it contained.

Individuals: If you want to close your account and delete your information, please refer to our FAQs here: <https://yoti.zendesk.com/hc/en-us/sections/202203845-Managing-my-Yoti-account>.

Objection rights

In certain circumstances you are entitled to object to Yoti External Apps processing your personal information. If you want to contact us about your objection rights, please email: privacy@yoti.com

Restriction rights

In certain circumstances you are entitled to ask us to restrict our processing of your personal information.

You can ask us to do this if you dispute the accuracy of your personal information; if our processing is unlawful but you prefer restriction to deletion; if we no longer need the information but you need it for legal reasons; or if you have objected to our processing and we are still dealing with this objection.

If you want to contact us about your restriction rights, please email: privacy@yoti.com

Portability rights

In certain circumstances you are entitled to receive the personal information you have provided us in a structured, commonly used and machine-readable format.

For Yoti External Apps, the only relevant information for this right is in relation to the Administrator details provided by a venue using the MyVenue products and services.

If you have had any contact with us and want to make a portability request, please email: privacy@yoti.com

Complain to the ICO

You can also complain to the Information Commissioner's Office (ICO) who is responsible for making sure that organisations comply with the law on handling personal information. (<https://ico.org.uk/global/contact-us/>).

Other GDPR information

The revised EU data protection law - GDPR - (in force from 25 May 2018) requires us to provide you with some extra information that isn't already set out elsewhere in our privacy policy.

Lawful bases

EU data protection law requires an organisation to have a lawful basis for its personal data collection and use, and there are several lawful bases available. We are a global app and so in some cases our choice of EU lawful basis reflects the need to comply with different laws in different countries.

Performance of a contract	<p>When you set up and use our products and services, almost all the personal data collection and use is necessary to provide the product or service.</p> <p>If you provide us your contact details to ask us a question or request more information, we use your details to reply and resolve any issues.</p>
Legitimate interests	<p>Some personal data collection and use is in our legitimate business interests.</p> <p>Fraud reporting: some anti-fraud bodies we work with require us to report identity fraud we discover.</p> <p>Analytics: we de-identify and aggregate the metrics information we get to understand how our website and app are performing, to identify bugs, and to identify where we need to focus our efforts to improve.</p> <p>Marketing campaign records: we keep information so we know who was sent what marketing information and when.</p> <p>Invoice and billing: for corporate customers.</p>

Legal obligation	<p>If you have provided us your contact details to hear about Yoti, its products and services and you no longer want to hear from us, we are obliged by law to stop contacting you. To meet this legal obligation we will add your details to a suppression list so you no longer hear from us.</p> <p>If you are a corporate customer, we are obliged to carry out some due diligence.</p>
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Retention

<p>We provide relevant retention information throughout this privacy notice.</p> <p>Organisations - corporate customer information in our business development database After two years of inactivity we will review your details and decide whether it is appropriate to retain or delete the information.</p> <p>Users Organisations using our products and services are able to download the information they collect from you from our systems into their own systems, so our retention information only relates to Yoti External Apps.</p>

Cookies

<p>We use cookies on our website to provide the service, collect anonymous information and for security purposes.</p>

What's a cookie?

<p>It's an online technology called cookies to collect information about you and to store your online preferences. Cookies are small pieces of information sent by a web server to a web browser which allows the server to uniquely identify the browser on each page.</p>

Types of cookies

<p>Session cookies These expire when you close your browser and do not remain on your computer.</p> <p>Persistent cookies These are stored on your computer until they expire or you delete them from your cache. They are normally used to make sure the site remembers your preferences.</p>
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Categories of cookies

<p>Strictly necessary cookies These cookies are essential for you to move around our website and dashboard and use their features. Without these cookies we cannot provide services you have asked for, such as access to secure areas.</p>
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<p>Performance cookies</p> <p>These cookies collect anonymous information on how people use our dashboard and website.</p>
<p>Functionality cookies</p> <p>These cookies remember choices you make, such as your last action, language and search preferences, such as language preferences. We can use these to provide you with a better experience based on your preferences. The information from these cookies is anonymous and they cannot track your browsing activity on other websites.</p>
<p>Targeting or advertising cookies</p> <p>These cookies are usually third-party cookies from marketing partners that collect information about your browsing habits on our website. The cookies are used to show you adverts on other websites you subsequently visit that are relevant to you and your interests.</p> <p>These cookies can track your browsing history across websites. If you wish to prevent this type of cookie, you may do so through your device's browser security settings.</p> <p>You can opt out of targeted advertising at http://www.youronlinechoices.com/uk/your-ad-choices. By opting out of these cookies you do not opt out of receiving advertising content altogether; you will instead receive general content.</p>

How do I delete cookies?

Go to the help and support area on your internet browser for instructions. Information on deleting or controlling cookies is also available at www.allaboutcookies.org. If you delete or disable our cookies you may not be able to access certain areas or features of our site.

Website cookies

Name of the cookie	Type of cookie	What we do with it
yoti_ignoreCookieBanner	Functionality cookie	Used to know that you have seen the cookie banner, and so not to show it you again.
_ga	Performance cookie	(Google Analytics and Adwords) Used to show us how users arrive at and interact with our website. It helps highlight areas where we can improve and shows us how successful our marketing campaigns are.
_gat	Performance cookie	Used by Google Analytics to prevent attacks on their servers.

_gid	Performance cookie	Used by Google Analytics to distinguish users from each other.
Unbounce: ubpv ubvs ubvt	Functionality and performance cookies	Unbounce anonymously tracks where people click on our website allowing Yoti to generate a diagram highlighting the most active areas, as well as count how many times users click on a certain link or button. We use this technology to understand how people use our website and to test different content, so that we can improve the website.
Youtube IDE PREF VISITOR_INFO1_LIVE YSC	Tracking or advertising cookie	IDE is an advertising cookie PREF, VISITOR_INFO1_LIVE and YSC collect visitor information and custom preferences. These are used for the YouTube video that is set to auto-play in the website banner.

Analytics

We collect information about your device and your use of our products using in-house analytics and third-party tools. The information we collect is de-identified and aggregated so we can't identify you personally. We use it to understand how our products are being used and to improve them.

What are analytics and why do we use them?

Analytics means collecting and analysing information about activity on our website and in our app. None of our analytics provide information about you personally. The statistics we get from this data allow us to understand how people are using our website or app, and things like what works and what doesn't, how long it takes to complete critical tasks and where we have users.

All these statistics are essential to understanding how our website and app are performing and identify where we need to focus our efforts to improve.

Website analytics

Facebook, Twitter and Google Adwords pixels

These track activity on the website such as when a user completes an activity (for example, clicking through, completing a purchase, downloading the app). We use this to determine which platform users come to Yoti from, and to understand what actions users take once they arrive at Yoti. For more information, please see:

- <https://www.facebook.com/business/help/651294705016616>
- <https://business.twitter.com/en/help/campaign-measurement-and-analytics/conversion-tracking-for-websites.html>
- <https://support.google.com/adwords/answer/1722054?hl=en-GB>

Contact us

Email: privacy@yoti.com; hello@yoti.com

Website: <https://www.yoti.com/contact/#contact-us-choose>

FAQs: <https://yoti.zendesk.com/hc/en-us>

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