

Privacy Policy

Innovative Technology Limited (ITL) and its affiliated companies and websites are committed to protecting your privacy. This Statement of Privacy applies to the ITL affiliated Intelligent Identification website (<https://www.intelligent-identification.com/>) (parent company ITL) and governs data collection and usage. By using the Intelligent Identification website, you consent to the data practices described in this statement.

Visitors to website

Collection of your Personal Information

Typically we collect data in order to provide the products and services that customers purchase or request from us. For example, we may capture identifiable information, such as your e-mail address, name, home or work address or telephone number. Via this website the only data collected is the information you provide to us when registering with the website or through an enquiry form or when you request to download a document such as a white paper.

There is also information about your computer hardware and software that is automatically collected by ITL. This information can include: your IP address, browser type, domain names, access times and referring website addresses. This information is used by ITL for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the Intelligent Identification website.

To update or change your personal information held on the Intelligent Identification website or to opt out for any reason contact us via email: sales@intelligent-identification.com. You can find out what data we hold about you in the same way. If you've signed up for email alerts, you can unsubscribe or change your settings at any time by selecting the 'unsubscribe' link that appears in every email. ITL use a third-party provider MailerLite to deliver e-newsletters. We gather statistics around email opening and clicks using industry standard technology to help us monitor and improve our e-newsletters.

Use of your Personal Information

ITL collects and uses your personal information to operate the Intelligent Identification website and deliver the services you have requested.

Including:

- process orders that you have submitted for goods and/or services;
- to carry out our obligations arising from any contracts entered into by you and us;
- seek your views or comments on the services we provide;
- notify you of changes to our services;
- send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals, other international trade activities, promotions of our associated companies goods and services;

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations (for example the collection of accounting data). We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

Your rights

You have the right to ask us to not process your Personal Information for marketing purposes. We will inform you (before collecting your Personal Information) if we intend to use your Personal Information for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your Personal Information. Alternatively, you can contact us by email at sales@intelligent-identification.com at any time.

If you have previously given your consent to the use of your Personal Information for marketing purposes, you can choose to stop receiving marketing communications which we send to you from time to time by following the unsubscribe instructions included in such communications. Alternatively, you can opt out of such communications at any time by contacting us by email at sales@intelligent-identification.com

You can choose to opt-out from your Personal Information being used for any purpose that differs from the purposes notified to you when we collected your personal information; or disclosed to any third party.

If you would like to do this, please contact us as set forth in the Contact section of this Privacy Statement. Please note that opting-out may prevent us from providing you with our services or information requested by you.

Data storage

We store your data on secure servers in the European Economic Area (EEA). ITL is registered with the Information Commissioner's Office.

Disclosing information

ITL does not sell or rent your information to third parties.

ITL will not share your information with third parties for marketing purposes.

ITL will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on ITL's site; (b) protect and defend the rights or property of ITL; and, (c) act under exigent circumstances to protect the personal safety of users of ITL, or the public.

You may contact us by email sales@intelligent-identification.com at any time, to request that we:

- update any Personal Information which is out of date or incorrect;
- delete any Personal Information which we are holding about you;
- restrict the way that we process your Personal Information;
- provide your Personal Information to a third-party provider of services; or
- provide you with a copy of any Personal Information which we hold about you.

We will consider all such requests and provide our response within the time period stated by applicable law.

Use of cookies

Some pages on our website use cookies, which are small files placed on your internet browser when you visit our Intelligent Identification website. ITL uses cookies for your convenience to store information so you do not have to re-enter your data upon each visit. Cookies and other technology are also used to monitor usage of the various features and services of our site, which over time gives us information to improve our site, and to advertise and market our products more effectively.

When you visit our websites, cookies will be placed on your computer or device to maximise your experience and to help us understand how we can improve our site. If you prefer not to receive cookies, you can set your browser to either reject all cookies, to allow “trusted” sites to set them, or to accept only those cookies from those sites you are currently on. However, turning off cookies will hinder your ability to access, use, or navigate portions of the site.

Security of your Personal Information

ITL and its affiliated Intelligent Identification website is committed to taking steps to protect the Information you provide to us, including administrative, technical, and physical measures — to safeguard Information against loss, theft, and misuse, as well as against unauthorised access, disclosure, alteration, and destruction. Information is accessed only by authorised staff who are instructed to handle Information with confidentiality. It is protected by firewalls and standard industry security measures. We may also transmit sensitive information and transactional data using secure socket layer (SSL) encryption. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect Information, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your Personal Information, we will use strict procedures and security features to try to prevent unauthorised access. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Website or our products and services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Biometric Products

The customer is legally responsible for all data processing of the devices they purchase.

Anonymous Age Estimation Application

Age check practice statement

Biometric devices (Lite, Pro, MyCheckr and MyCheckr^{Mini}) will perform facial analysis on a subject to estimate their age. The age estimation is performed anonymously and locally on the device hardware. No data utilised by the facial analysis is saved. Any data in RAM is automatically purged after the estimation is performed.

Lawful basis for processing

The current laws, policies, and guidelines to govern the use of facial analysis technology are still in its infancy and will be amended in the time. The latest opinion from the ICO (Information Commissioner's Office) on Age Assurance for the Children's Code (14th October 2021) explicitly sanctions the use of biometric data for higher-risk use-cases to complete age assurance processes under the public interest

reason for processing data: <https://ico.org.uk/media/about-theico/documents/4018659/age-assurance-opinion-202110.pdf>

This allows the anonymous processing of faces without explicit content – in the environment of restricting access of Children to age restricted goods and services.

We also refer to Article 6(1)(f) where Legitimate interests is one of the six lawful bases for processing personal data.

(f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”

Here we apply the three-part test:

- **Purpose test** – The processing is performed to restrict access of a minor to age restricted goods and products.
- **Necessity test** – The processing gives additional protection to the minor and to the retailer in restricting access to age restricted goods or services.
- **Balancing test** – The processing restricts a minor from accessing age restricted goods. No data is stored after the processing is complete. In relation to Alcohol, this helps the minor and retailer adhere to the 2003 Licensing Act, and as such reduces possible criminal acts or threats to public security.

ITL is committed to continual improvement of the accuracy of the age estimation algorithms. This is in the form of both reducing any bias (gender or skin tone) and increasing the accuracy of the age estimated. There will be no change to how the data is used – no data will be stored and any processed information will be deleted after the result is returned.

Frequency of recheck

There is no data stored. Each presentation to the camera is treated as an entirely new event. The face is processed, and all data related to that presentation is permanently deleted. If the same subject presents to the camera again, the presentation is treated as a new presentation.

Changes to this Statement

We may update our Privacy Statement from time to time. By continuing to use the services and our website, you agree to the latest version of our Privacy Statement. Any changes we make to our Privacy Statement in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our Privacy Statement. If you have any questions regarding this Statement or our use of personally identifiable information on this site, please send us your questions or comments as set forth in the Contact section below. Contact Information. If you have any questions in relation to this Statement of Privacy or how we collect, use or store your Personal Information, you can contact us by phone at: +44 (0)161 626 9999, by post at: Innovative Technology Limited, Innovative Business Park, Derker Street, Oldham, OL1 4EQ or by email at: sales@intelligent-identification.com

Right to lodge a complaint with the ICO

You have the right to contact the ICO if you are unhappy about how ITL has handled your data. If you need to contact the ICO to lodge a complaint, please contact:

ICO

Telephone: 0303 123 1113

Textphone: 01625 545860

Monday to Friday, 9am to 4:30pm

Information Commissioner's Office
Wycliffe House Water Lane
Wilmslow
Cheshire
SK9 5AF

Or alternative lodge your complaint online:

<https://ico.org.uk/make-a-complaint/data-protection-complaints/data-protection-complaints/>

Data Protection Officer: Tom Pennington-Brookfield

Last Updated: March 2024