

TrustID Privacy Notice – Identity Document Checking Services

Our contact details

Name of controller: TrustID Limited

Address: The Blade, Abbey Street, Reading, Berkshire RG1 3BA

Phone Number: 0118 466 0822

General Email: info@trustid.co.uk

Data Protection Email: dpo@trustid.co.uk

Our data protection officer (DPO): URM Consulting Ltd, Blake House, Manor Park, Manor Farm Road, Reading, Berkshire RG2 0JH

The type of personal information we collect

We need to collect a range of information to provide our identity document checking services to our customers. For the purposes of the General Data Protection Regulation as incorporated into UK law by the Data Protection Act 2018 (GDPR), our customers are the controllers of your information and we are processors of that data. If you are in the EEA or UK, our customer is responsible for identifying a lawful basis and purpose for the processing your personal information, and you should review their privacy policy for any further information. If you are a US resident, our customer may have additional obligations under the state law in which you are resident (e.g. California Consumer Privacy Act) and we recommend you review their privacy policy for further details.

The information we need to collect depends on the service that is provided to the customer. The basis of each check is the image of an identity document, and we check this is genuine either as a service in itself, or then use to perform follow-on checks. For example, some customers will also ask us to perform a facial match assessment, where we check that the image in an identity document matches a selfie provided by the holder. We may also be asked to perform an address verification check, and to do so we will check whether there are records of the identity document holder living at a specified address.

At the request of TrustID's customers, we may process any of the following information, depending on the service being accessed:

- Contact information
 - Name
 - Email address
 - Phone number
 - Job title
 - Street address (current and historical)
- General identifiers
 - Selfie
 - ID document photo
 - Sex
 - Date of birth
 - Nationality
 - Place of birth
 - Passport number
 - Driving licence number

- Identity card number
- Location Data
 - IP Address
- HR information
 - Potential employer
- Credit and anti-fraud
 - PEP & Sanctions information
 - Criminal record (Standard and Enhanced DBS checks only)
- Biometric data (Special Category Data)
 - Electronic comparison of selfie and ID document photo

If you are a resident of the United States, in the event that TrustID's customer requests that you supply your biometric data, you should note the following:

- The purpose of this is to confirm your identity in support of the reasons mentioned below.
- Processing is done by comparing a selfie photo of your face with the image of your face as found in your identity document.
- TrustID does not sell, lease, trade or otherwise profit from your biometric data.

How we get the personal information and why we have it

TrustID customers will either pass your information to TrustID for the purposes they have agreed with you, or they will send you a link to enable you to upload your information to TrustID directly. We use the information that you have given us or the TrustID customer to perform the checks the TrustID customer has contracted us to perform.

TrustID may then process the information for one of the following reasons:

- Right to work checks
- Right to rent checks
- Right to study checks
- Candidate vetting
- Disclosure and Barring Service checks
- Customer screening
- Address verification
- Politically Exposed Person (PEP) & Sanction checks

Depending on the service the TrustID customer has requested, we will share your information with the relevant third-processors necessary to carry out the data processing in the link below. We will also share your information and the results of the check with the TrustID customer.

A list of current TrustID sub-processors can be found here: [Processors - TrustID](#)

Regardless of data origin, TrustID will perform the required checks and communicate the results back to the TrustID customer only. The customer then decides whether they want to proceed with your application.

Under the GDPR, we rely on Article 6.1b “Contractual Obligation” as the lawful basis for processing this information. For biometric Special Category Data, the Article 9.2 exception which applies is that you have explicitly consented to the processing.

How we store your personal information

Your information is securely stored in the United Kingdom with some processing taking place in the EU countries listed in the above table, which have an adequacy decision from the UK Government. In exceptional circumstances (e.g. for the purposes of investigation) our sub-processor LexisNexis Risk Solutions may pass data to their parent company which is located in the USA. Such transfers are subject to the UK-US data bridge (the UK extension of the EU-US Data Privacy Framework), and LNRS is a certified participant to the data bridge under their parent company RELX ([Data Privacy Framework List](#)).

Retention of your personal information

We keep the information you provide for as long as we are contractually obliged to by the TrustID customer. After this point your information is permanently and irretrievably deleted. The default retention period is 7 days, although the data can be deleted manually prior to this point if no longer required by the TrustID customer. The TrustID customer may extend the retention period so Data Subjects should contact the TrustID customer (i.e. the organisation requesting the checks on your data) directly to confirm the retention period, because they are the controllers of your data.

Where LexisNexis Risk Solutions (LNRS) is engaged to perform address checking and PEP & Sanction screening, this data is retained by LNRS for 6 years, in line with the maximum time period for bringing contract legal actions, to allow LNRS to defend any such claims.

Where a DBS application has been submitted, the following retention schedule applies within the Matrix Security Watchdog platform:

- 6 months after completion date – application is moved to the eBulk archive. PII used to support the application is retained but DBS results are removed.
- 1 year after completion date – application is purged with all PII removed with the exception of full name, DOB, employer name and position applied for.
- 3 years after completion date – application is fully and securely deleted from eBulk.

Your data protection rights

Under data protection law, you have rights including right of access, right to rectification, right to erasure, right to restriction of processing, right to object to processing and right to data portability. If you would like to access a copy of, delete or otherwise exercise control over your personal information, contact TrustID using the details below. Please be aware that for most requests, TrustID will need to notify the TrustID customer as it is likely that the customer not TrustID will need to fulfil the request. This is necessary where TrustID is acting on the customer’s behalf.

You are not required to pay any charge for exercising your rights. If you make a request, the controller has one month to respond to you.

Please email dpo@trustid.co.uk or write to us at TrustID Ltd, The Blade, Abbey Street, Reading, Berkshire, United Kingdom, RG1 3BA if you wish to make a request.

We will record any data subject rights request received from you indefinitely on a log containing your name, details of your request and how it was handled by us. We will hold your original request for no longer than 3 months after closure on the TrustID data subject rights request log.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at dpo@trustid.co.uk.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

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

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Version number and updates

This is Version 13 of this privacy notice and is dated 22 August 2024. We keep this privacy notice under review and update it as necessary. Please visit TrustID's website regularly to check whether any updates to this notice have been issued.