

ULTRAPASS IDENTITY CORPORATION PRIVACY POLICY
Version 2.0 — January 22, 2024

Welcome to UltraPass ID's Privacy Policy. Regardless of what brought you here, we hope you find what you're looking for.

UltraPass ID is a company that enables the easy integration of self-sovereign identity technology into software applications, including mobile, web-based, and desktop applications. We also help consumers easily manage their [self-sovereign identity](#).

We've done our best to make our terms reasonable, complete, readable, and understandable, but you may still have additional questions or clarifications. If so, feel free to contact us using one of the methods below:

- Submit a contact form [here](#)
- Email us at: contact@ultrapassid.com
- Snail mail at: Unit 10-1 Fort Legend Tower, 3rd Ave. cor 31st St. BGC Taguig City, Metro Manila, Philippines 1632

REGISTERING WITH, ACCESSING, DOWNLOADING OR OTHERWISE USING OUR SERVICES (AS DEFINED BELOW) INDICATES THAT YOU HAVE READ AND ACKNOWLEDGE THE NOTICES AND PRACTICES SET FORTH IN THIS PRIVACY POLICY. IF YOU DO NOT WANT TO US TO COLLECT AND USE YOUR PERSONAL INFORMATION AS SET FORTH IN THIS PRIVACY POLICY, DO NOT ACCESS, DOWNLOAD OR OTHERWISE USE THE OFFERINGS.

INTRODUCTION

Privacy is one of our core values, so UltraPass Identity Corporation. (“we,” “us,” “our” or “UltraPass ID”) respects your privacy. Our website, applications (both web and mobile), APIs, or other cloud-based services that we host on your behalf (the “Services”) are designed to minimize the amount of data we collect about you (“you” or “Customer”). In order to interact with you and improve the Services, we do collect some information. This Privacy Policy (“Policy”) describes how we collect, use, and share your personal information in connection with the Services.

1. When User Information Is Collected.

1.1 Information Collection.	UltraPass ID collects your information during your access or use of the Services, including (i) any websites or web application provided, published, developed or made available by the Company; (ii) any mobile or online applications provided, published, licensed, developed or made available by the Company; and (iii) any feature, content, software, hardware, services or other products available on or through the Services or otherwise provided by the Company. Your access and use of the Services is conditioned on your providing us with any requested User Information.
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2. WHAT USER INFORMATION IS COLLECTED. “User Information” as used in this document shall include the information identified in Section 2.

2.1 Digital Credentials	Digital identity technology and digital wallets are designed to provide a secure method for consumers and businesses to access and exchange identity-related information (“Digital Credentials”). These digital credentials can be stored on the end-user’s device or in the cloud. When credentials are stored on the end-user’s device, even UltraPass ID can’t access that information. When cloud storage is used, we may host these Digital Credentials through third-party cloud service providers and hold encryption keys relating to these Digital Credentials.
2.2 Personally Identifiable Information.	Company may collect any personally-identifiable information that you provide in connection with any Services, including, without limitation: your name, email address, mailing address, phone number, photograph, birthdate, passport, driver’s license, government-issued identification numbers, and other similar information provided with respect to your business or its employees, officers, representatives or affiliates, and certain historical, contact, and demographic information about you.
2.3 Device Information.	Company may access, collect, monitor, and/or remotely store information about your device when you access any Services, including hardware model, operating system and version, unique device identifier, mobile network information, and information about the device’s interaction with the Services.
2.4 Payment Information.	Company utilizes a third-party service provider, Stripe, to process payments through the Service, and this may include the collection of information in connection with you making, accepting, requesting or recording payments, credits or money transfers through any Services, including payment card numbers, bank accounts information, when and where the transactions occur, the names of the transacting parties, a description of the transactions, the payment or transfer amounts, billing and shipping information, and the devices and payment methods used to complete the transactions. Your use of Stripe will be governed by Stripes Terms of Service (here) and Privacy Policy (here).
2.6 Usage Information.	Company may collect information and data about how you use the Services, including access time, Services accessed, browser type and language, Internet Protocol (“IP”) address, webpages and applications

	viewed and used, time spent on webpages and applications, links clicked, and conversion information (e.g., transactions entered into).
2.7 Aggregated Data.	Company may collect aggregated data about you or your use of Services, or any other aggregated form of the other types of User Information set forth above. Aggregated data that we collect cannot be specifically associated with you individually.
2.8 Data from Clients	During the course of data hosting services for our clients, we receive encoded data relating to our clients and clients' customers. This data enables our clients to identify and interact with their customers when using our Services or Apps. The encoded data may be any of the User Information defined above.
2.9 Do Not Submit Sensitive Personal Information.	<p>We ask that you not provide us with any sensitive personal information (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Service, or otherwise to us.</p> <p>If you provide us with any sensitive personal information to us when you use the Service, you must consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information through our Service.</p>

3. HOW USER INFORMATION IS COLLECTED.

3.1 Given by You.	You provide certain User Information when you register for your account with the Services, as you use the Services, or as you engage with Company through its Services.
3.2 Automatic Collection.	User Information can be recorded and collected by software or processes that run automatically on your computer or device or on Company's servers as you use the Services.
3.3 Analytics information.	We may collect, measure, and analyze traffic and usage trends in connection with our website and other Services, and We use third-party analytics tools to help us. We may use third-parties to provide analytics

	<p>services. This allows us to understand, among other things, who is using the Services, how they are using them, where they get stuck, and other ways to improve the Services. Such third-party analytics tools and services may use cookies and persistent device identifiers to collect and store information including, but not limited to time of visit, pages visited, time spent on each page, IP address, unique device ID, advertising tags and type of operating system used.</p>
<p>3.4 Cookies.</p>	<p>User Information may be collected by sending cookies to your device. Cookies are small data files that are stored on your hard drive or in your device memory when you use the Services. A cookie may also convey information to us about how you use the Services (e.g., the pages you view, the links you click and other actions you take) and allow us or our third-party analytics tools We use to track your usage of the Services. There are at least two different types of cookies: persistent and session cookies. A persistent cookie remains on your hard drive after you close your browser. Persistent cookies may be used by your browser on subsequent use of the Services. Persistent cookies can be removed by following your Web browser's directions for removal of cookies. A session cookie is temporary and disappears after you close your browser. You can typically remove and reject cookies from our Site with your browser settings. Many browsers are set to accept cookies until you change your settings. If you remove or reject our cookies, it could affect how the Services are provided.</p> <p>You can find out more about cookies and how to manage them by visiting www.AboutCookies.org. You can understand which third parties have currently enabled cookies for your browser or mobile device and how to opt-out of some of those cookies by accessing the Network Advertising Initiative's website or the Digital Advertising Alliance's website. For more information on mobile specific opt-out choices, visit the Network Advertising Initiative's Mobile Choices website.</p>
<p>3.5 Web Beacons.</p>	<p>User Information may also be collected by using web beacons. Web beacons are electronic images that may be used in connection with the Services. Company may use web beacons to deliver cookies, track the number of visits to the Offerings, understand Service usage and effectiveness, and determine whether an email has been opened and acted upon.</p>
<p>3.6 From Third Parties.</p>	<p>User Information may be provided to us by third parties that already have access to certain of your User Information, including third-party verification services, mailing list providers, and publicly available sources. User Information may also include your data and content contained within a third-party service links or integrates with the Services. This Privacy Policy</p>

	<p>does not apply to, and Company is not responsible for, third-party cookies, web beacons, or other tracking technologies, which are covered by such third parties' privacy policies. Company continually evaluates analytics services to use in addition its own, and Company may update this policy in the future to reflect Company's ongoing use of said services.</p>
3.7 Do Not Track.	<p>Some internet browsers incorporate a "Do Not Track" feature that signals to websites you visit that you do not want to have your online activity tracked. Given that there is not a uniform way that browsers communicate the "Do Not Track" signal, the website does not currently interpret, respond to or alter its practices when it receives "Do Not Track" signals.</p>
3.8 Google Analytics	<p>We may use Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses Cookies or other tracking technologies to help us analyze how users interact with the Site and Services, compile reports on their activity, and provide other services related to their activity and usage. The technologies used by Google may collect information such as your IP address, time of visit, whether you are a returning visitor, and any referring website. The technologies used by Google Analytics do not gather information that personally identifies you. The information generated by Google Analytics will be transmitted to and stored by Google and will be subject to Google's privacy policies. To learn more about Google's partner services and to learn how to opt-out of tracking of analytics by Google, click here.</p>

4. HOW USER INFORMATION IS USED.

4.1 Providing Services.	<p>User Information is stored and used so that you can verify your identify using the Services. User Information is also used to save your preferences, user profile and information in connection with creating, using and accessing your account with the Services, and to deliver, operate, provide, maintain, enhance, personalize, tailor and facilitate your use of the Services.</p>
4.2 Improving Services.	<p>User Information is also used to develop new products and Services, provide optimization, statistical analysis, and improvements for existing Services, and to improve web design and functionality.</p>
4.3 Communication Purposes.	<p>User Information is used to deliver technical notices, security alerts, support messages, administrative notices and alerts, and communications relevant to your use of the Service, as well as to inform you about software compatibility issues, send news or information, conduct surveys and collect feedback. User Information is also used</p>

	to communicate with you about products, services, contests, promotions, discounts, incentives, gift cards, loyalty programs, and rewards, based on your communication preferences and applicable laws.
4.4 Facilitate Payments.	Using and storing your User and Payment Information is necessary for us to be able to process or record payment transactions or money transfers.
4.5 Track and Display Consumer Behavior.	User Information is stored so that the Services can track historical transactions, payments, invoices, receipts and past order information. User Information is also used to display current, ongoing, pending or requested transactions or orders.
4.6 Legal Compliance.	User Information is stored so that we can comply with applicable laws and regulations, including the privacy laws and anti-money laundering laws.
4.7 Aggregated Data Collection.	User Information is collected and aggregated to monitor aggregate usage and web traffic routing of all users of the Services, as well as to generate aggregated statistics about purchasing behavior of different demographics and populations.
4.8 Dispute Resolution; Contract Enforcement.	User Information may be used to resolve disputes; collect fees; provide assistance with problems with Services; protect Company rights or property or the security or integrity of the Services; enforce the Terms of Use and other terms and conditions that govern use of the Services; and investigate, detect and prevent fraud, security breaches, and other potentially prohibited or illegal activities.
4.9 Use for New Purposes.	We may use your personal information for reasons not described in this Privacy Policy where permitted by law and the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis.

5. HOW USER INFORMATION IS SHARED.

5.1 Facilitate Third Party Services.	We, like many businesses, sometimes engage third parties to perform certain business-related functions and will share certain User Information for such parties in order for the third party to perform such functions. These third-party services may include anonymous site metrics, analytics services, payment processing, point of sale services,
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	task management services, order fulfillment and shipment/delivery of products and Services to users, mailing services, maintaining databases and other features or services included in or necessary for the Services. When we employ another party to perform a function of this nature, we only provide them with the information that they need to perform their specific function and use commercially reasonable measures to obligate any such third parties to maintain the confidentiality of any User Information we share with them.
5.2 For Legal and Safety Purposes.	User Information may be shared for legal protection, and safety purposes, such as to comply with laws, respond to lawful requests and legal processes, protect the rights and property of Company against competitors or claimants, and enforce our agreements, policies, and terms of use.
5.3 Business Transfers.	As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, User Information may be part of the transferred assets.
5.4 Affiliated Entities.	We may also share your User Information with our affiliated entities for purposes consistent with this Policy.

6. HOW USER INFORMATION IS PROTECTED.

6.1 Protective Measures.	Company takes commercially reasonable measures, including administrative, technical, and physical safeguards, to (i) protect User Information from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction, (ii) ensure the security, confidentiality, and integrity of the User Information, (iii) protect against any anticipated threats or hazards to the security or integrity of the User Information, (iv) protect against unauthorized access to, or unauthorized use or disclosure of, the User Information, and (v) take such security measures required by any applicable privacy laws.
6.2 Third Party Partners and Employees.	Company may, by itself or using third-party service providers, hold, process and store User Information, including in the United States, Japan, the European Union and other countries. Company restricts access to User Information to those employees, contractors, and agents who need to know that information for purposes of performing their obligations to Company or to you, and who are subject to contractual confidentiality obligations, and who may be disciplined or terminated if they fail to meet these obligations. Company third-party service providers store and

	transmit User Information in compliance with appropriate confidentiality and security measures.
6.3 Security Breach.	<p>We maintain reasonable technical safeguards to protect the security, integrity and privacy of your User Information. However, no method of internet transmission or electronic storage is 100% secure or error-free, so it is never possible to guarantee absolute security.</p> <p>If required by law, Company shall give prompt notice to you of any unauthorized access to User Information and shall immediately commence a thorough investigation into any such incident.</p>
6.4 Company Not Liable for Breach.	Company will not be liable for any damages, claims, liability, or causes of action that arise as a result of any unauthorized access or use of your User Information.

7. EXCLUSIONS.

7.1 Unsolicited Information.	<p>This Policy shall not apply to (i) information posted by you to any public areas of the Services, such as bulletin boards, chat room, community pages or comment areas, (ii) any ideas for new products or modifications to existing products, and (iii) other unsolicited submissions (collectively, "Unsolicited Information"). Unsolicited Information shall not be considered User Information and by submitting Unsolicited Information to us, you hereby grant us a license to reproduce, use, disclose, and distribute such Unsolicited Information to others without limitation or attribution.</p>
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8. CHOICES; RETENTION; CHILDREN.

8.1 Data Retention.	<p>We retain personal information for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for fraud prevention purposes.</p> <p>To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.</p> <p>When we no longer require the personal information we have collected about you, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. If we anonymize your personal information (so that it can no longer be</p>
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	associated with you), we may use this information indefinitely without further notice to you.
8.2 Contact Information and Choices.	If you have any questions that aren't addressed by this Privacy Policy, please let us know! Our contact information can be found at the top of this Privacy Policy. Use it to contact us for anything related to our use of your information, including opting-out of sharing your information with others, updating your information, finding out what information we have about you, or for anything that you feel violates any of your above listed rights.
8.3 Children.	Our services are not directed to children and/or persons under the age of majority in their respective jurisdictions and are intended for use by adults and/or persons at or over the age of majority only. We do not knowingly collect personal data from individuals under eighteen (18) years of age. If you are under the age of eighteen (18), please do not submit any information through our Services or other offerings and do not provide your consent for the use of your data unless your parent or guardian has approved.
8.4 Interest-Based Ads.	Unaffiliated third parties may use cookies and other technologies on third-party websites to collect information about your online activities over time and across different websites you visit in order to provide you with interest-based advertising. You can generally opt-out of receiving interest-based advertisements from members of the Network Advertising Initiative by clicking here or the Digital Advertising Alliance by clicking here . When you opt-out using these links, please note that you may still receive advertisements. However, advertisements will not be personalized based on your interests.

9. NOTICE TO RESIDENTS OF EUROPE AND THE UNITED KINGDOM.

9.1 General Information.	UltraPass ID recognizes the importance of protecting the privacy of our customers and the users of the Services. As such, we will always ensure that we have a lawful basis for processing your Personal Data. UltraPass ID's offices are located at UltraPass ID Technologies Inc., Unit 10-1 Fort Legend Tower, 3rd Ave. cor 31st St. BGC Taguig City, Metro Manila, Philippines 1632 (Attn: Legal). UltraPass ID is the data controller of all Personal Data collected from residents of the European Economic Area (EEA) or the United Kingdom. "Personal Data" shall mean any information or User Information which is related to an identified or identifiable natural person.
9.2 Our Legal Basis for Collecting, Storing, and	We will collect and process your Personal Data based on one of the following legal bases:

Processing Your Personal Data.	<ul style="list-style-type: none"> · <u>Consent</u>. We may process your Personal Data with your consent. You have the right to withdraw your consent at any time. · <u>Performance of a Contract</u>. We may process your Personal Data if it is necessary for the performance of a contract to which you are a party. · <u>Comply with a Legal Obligation</u>. We may process your Personal Data if it is necessary to comply with a legal obligation to which we are subject. · <u>Legitimate Interests</u>. We may process your Personal Data if doing so is necessary for our legitimate interests and those legitimate interests are not overridden by your interests or fundamental rights and freedoms.
9.3 Your Legal Rights.	Under the GDPR and the UK GDPR, you have the following rights related to UltraPass ID's use of your Personal Data.

Right	Description of your right
Access	A right to access Personal Data held by us about you, as well as information about how we are using your data.
Rectify	A right to require us to rectify any inaccurate Personal Data held by us about you.
Delete	A right to require us to erase Personal Data held by us about you, and where the Personal Data has been made public, for other controllers processing the Personal Data to also erase links to, or copy or replication of, such Personal Data. This right will only apply where (for example): we no longer need to use the Personal Data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your Personal Data based on your consent; or where you object to the way we process your data (in line with the right to restrict use below).
Restrict Use	A right to restrict our processing of Personal Data held by us about you. This right will only apply where (for example): you dispute the accuracy of the Personal Data held by us; or where you would have the right to require us to erase the Personal Data but would prefer that our processing is restricted instead; or where we no longer need to use the Personal Data to achieve the purpose we collected it for, but you require the data for the purposes of dealing with legal claims.
Data Portability and Transfer	A right to receive Personal Data, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to require us to transfer this personal data to another organization, at your request.

Object to Processing	A right to object to our processing of Personal Data held by us about you (including for the purposes of sending marketing materials to you).
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9.4 International Data Transfers.	<p>UltraPass ID is located in the United States, as such, your Personal Data may be processed by us or our service providers in the United States. In such case, we have endeavored to establish and provide appropriate safeguards for EEA residents, and provide EEA residents the ability to enforce their data subject rights and provide EEA residents effective legal remedies as set forth in GDPR Article 46.</p> <p>For any transfer of Personal Data from the EEA, Switzerland, or the United Kingdom that we make, we use appropriate safeguards to ensure for the lawful processing and transfer of the Personal Data. When appropriate, we may use standard contractual clauses approved by the European Commission. Please contact us through one of the methods provided in the “Contact Us” section below and put “Safeguards” in the subject line to receive more information on the safeguards we have put in place.</p>
9.5 Make a Complaint.	<p>If you have any concerns or complaints regarding our processing of your Personal Data, please contact us through one of the methods provided above and put “Complaint” in the subject line.</p> <p>If you have any concerns regarding our processing of your Personal Data or are not satisfied with our handling of any request by you in relation to your rights, you have the right to make a complaint to your local supervisory authority (EU Data Protection Authorities, Information Commissioner’s Office).</p>

10. NOTICE TO RESIDENTS OF CALIFORNIA, NEVADA AND UTAH.

10.1 Notice to California residents.	We do not disclose your personal information to any third party for such third party’s direct marketing purposes. Thus, under California Civil Code Sections 1798.80-1798.84, upon your request, we have no obligation to provide you with further information. Any inquiries regarding this Privacy Policy can be directed to the contact identified below.
10.2 Notice to Nevada Residents.	Nevada law allows Nevada residents to opt out of the sale of certain types of personal information. Subject to several exceptions, Nevada law defines “sale” to mean the exchange of certain types of personal information for monetary consideration to a person for the person to license or sell the information to additional persons. We do not currently sell personal information as defined in the Nevada law. However, if you are a Nevada resident, you still may submit a verified request to opt out of sales and we will record your instructions and incorporate them in the future if our policy changes. Opt-out requests may be sent to us through one of the methods

	provided in the “ Contact Us ” section below and put “Nevada Opt-Out” in the subject line.
10.3 Notice to Utah residents.	We do not disclose your personal information to any third party for such third party’s direct marketing purposes.

11. CHANGES TO THIS PRIVACY POLICY.

11.1 Changes to this Policy.	This Policy is subject to occasional revision, and if we make any substantial changes, we may notify you through the Services, by sending you an e-mail to the last e-mail address you provided to us (if any), and/or by prominently posting notice of the changes on our Services or through your account. You are responsible for providing us with your most current e-mail address. In the event that the last e-mail address that you have provided us is not valid, or for any reason is not capable of delivering to you the notice described above, our dispatch of the e-mail containing such notice will nonetheless constitute effective notice of the changes described in the notice.
11.2 Effectiveness of Changes.	Any changes to this Policy will be effective upon the earlier of fifteen (15) calendar days following our dispatch of an e-mail notice to you (if applicable) or fifteen (15) calendar days following our posting of notice of the changes on our Services. These changes will be effective immediately for new users of the Services.
11.3 Acceptance of Policy.	Continued use of the Services following notice of changes to this Policy shall indicate your acknowledgement and acceptance of such changes and agreement to be bound by the updated Policy.
11.4 Last Revision Date.	This Policy was last updated on the date indicated above. Please review this policy periodically, and especially before you voluntarily provide any User Information.