

## Privacy and Data Protection

### How we protect user data

Incognia is committed to meeting the highest global standards for privacy and security. We follow the 7 fundamental principles of Privacy by Design, as the basis for creating and developing our products and Incognia's company culture promotes the mission of developing high performance technology without requiring data subject recognition of a data subject.

### Incognia as a Processing Agent

Incognia acts as a Processor, that is, an agent that performs data processing on behalf of the Controller - our Client. Incognia does not use the data collected through the Incognia SDK integration with a Controller's application for any purpose other than those related to our services.

### Data Storage

The data that Incognia collects is transferred and stored in encrypted form and in object storage base (Simple Storage Service, or S3) hosted in technological environments managed solely and exclusively by Incognia through the uses of a public cloud platform provided by Amazon Web Services (AWS).

### Data Security

- Incognia encrypts data at rest and in transit, and also applies advanced encryption and hashing techniques as another layer to protect its data bases. Deleting the original media identifier mitigates risks associated with improper access to data.
- The identifier that is stored (the hashed ID) is sufficient for all Incognia services. The hashed ID does not allow the direct identification of data subjects and reduces the risks of identifying users in case of confrontation with a third-party database that contains the hashed ID linked to other personal data, such as email, SSN, etc.
- Therefore, Incognia data storage and encryption techniques are specifically designed so that in case of leakage or improper access to the information collected and processed by Incognia, the data subjects will not be directly associated with this data, reducing the risk of data subjects being affected.

### Data Subject Rights

- We guarantee the exercise of the data subjects rights provided for in the General Data Protection Regulation of the European Union (GDPR), California Consumer Privacy Act (CCPA) and Brazil's General Data Protection Law - (Lei Geral de Proteção de Dados - (LGPD)
- According to legislation, data subject rights must be requested by the data subject from the Controller - our Clients, who, if applicable, will send us the requests to assist them in fulfilling their legal obligation.

## Data Collection



### Data Incognia does not collect

Incognia technology requires no storage or access to data that can directly identify users: Incognia does not collect unique static identifiers from mobile devices (IMEI and MAC), associated accounts (email address and phone number), or civil identification data including name, Social Security Number etc,

We also do not collect or make intentional inferences or associations of users based on sensitive (special category) data and we intentionally do not gather personal information from users under 18 years old.

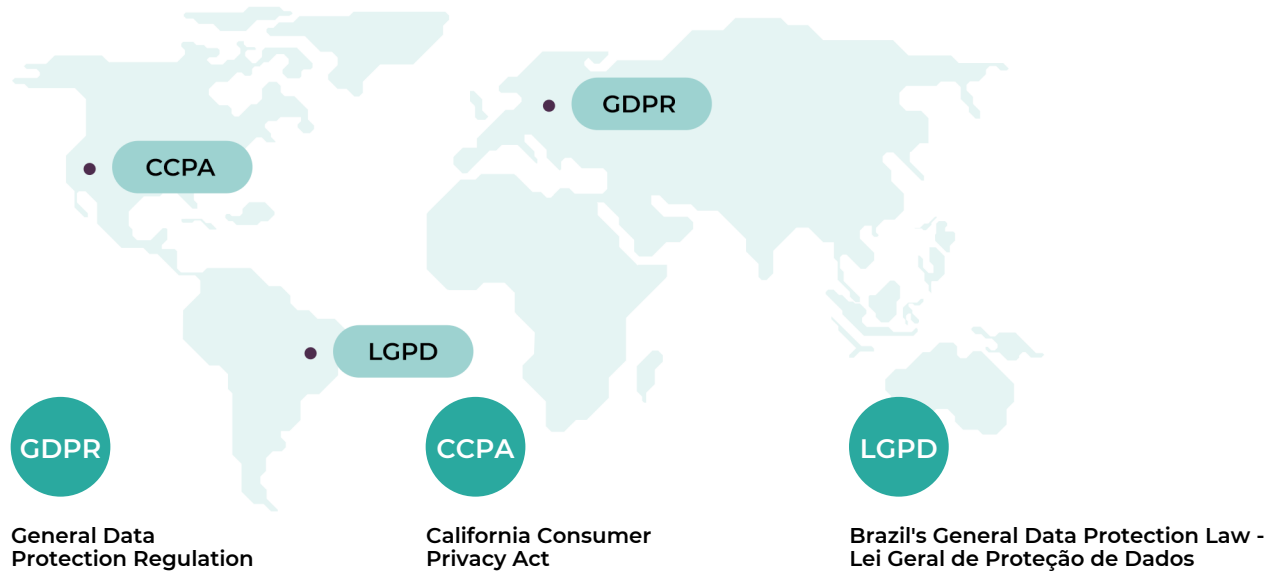


### Data Incognia collects

- Incognia only collects the minimum data that is necessary to achieve the processing purposes detailed in our [Privacy Policy](#), this includes the following: Location data, such as GPS, wi-fi and bluetooth signals, as per the user's permissions
- Device Data such as device model, operating system, performance metric, among others
- App data, such as App sessions (when is the app opened and how much time does it remain open); Events defined by apps developers including registration of new user, in-app transactions, among others
- Advertising identifiers that are only stored after either hashing with salt or encrypting

The data Incognia collects is only stored for the period necessary to achieve the intended purposes, or to comply with legal/regulatory requirements. After that, Incognia performs the secure deletion of the data.

## Compliant with all applicable privacy regulations



### SOC 2, Type II

Incognia has achieved Systems and Organization Control (SOC) 2, Type II certification that guarantees security on the part of Incognia's technology. This type of certification guarantees an international standard on cybersecurity risk management systems.

As a result, this certification verifies that Incognia has in place security measures such as risk monitoring, systems and control application; environment management and logical and physical access; communication channels; risk mitigation and assessment mechanisms; and change management.

## Useful Links

### Website Privacy Policy

[Read more →](#)

### Cookies Policy

[Read more →](#)

### Incognia Solution Privacy Policy

[Read more →](#)

### E-book: Privacy by Design

[Read the ebook →](#)

### Code of ethics

[Read more →](#)

### Incognia Pillars for Data Protection and User Privacy

[Read more →](#)

## About Incognia

Incognia is a privacy-first location identity company that provides frictionless mobile authentication to banks, fintech and eCommerce companies, for increased mobile revenue and lower fraud losses. Incognia's award-winning technology uses location signals and motion sensors to silently recognize trusted users based on their unique behavior patterns and is a key enabler for Zero-Factor Authentication. Deployed in over 200 million devices in more than 20 countries, Incognia delivers a highly precise risk signal with extremely low false positive rates.

