

GOV UK VERIFY

Privacy Policy



This policy is to be read in conjunction with, and makes reference to the main Privacy Policy of Post Office Limited. This GOV UK VERIFY Privacy Policy deals with the data processing activities that are specific to GOV UK VERIFY services only. By setting yourself up as a user on the profile creation webpage, and your continuous use of these services, you are giving Consent to the capture and processing of your personal information in accordance with the information provided in this Privacy Policy. If you withhold or withdraw your Consent, you cannot use the GOV UK VERIFY Service.

What information we collect about you, and why

The information we collect about you, will vary depending on the purposes of the processing, in other words, the Services that we are providing to and for you, and what you have agreed to.

Your personal information will be used by us to verify your identity, and to maintain and administer your GOV.UK VERIFY account. This includes security and fraud protection, as well as audit and accounting.

Where we collect your data from

Most of the information you provide directly to us yourself, or by a person you have nominated to provide the information on your behalf. We also collect other pieces of information which can be regarded as observed, that is data we capture as part of providing you the service, for example, location data provided when you use the internet. Additionally, we collect, derive or infer some of your data from 3rd parties, for example, from a credit reference agency when you apply for our Services.

The Purposes:

Identification services which allow us to **create** and **verify** you as a person.

For this purpose, we process all of the data under 'Categories of Personal Data' to enable us to verify your identity for the services you choose to access, including using credit reference and fraud prevention agencies to help us verify that you are who you say you are. We process your data by you giving us permission called '**Consent**'.

As the nature of what we are doing is particularly intrusive in terms of understanding the history of events in your life, and you may be the only person that knows this information, we may also need ask for your '**Explicit Consent**' depending on your answers to some questions, and the information you provide. '**Explicit Consent**' is needed when we process sensitive information, such as health data, and we call this "Special Category Data".

Obtaining your '**Explicit Consent**', means we need to be very sure that you know what you are consenting to. We regard your Consent as given explicitly by performing three or more of the following affirmative actions, confirming your agreement to processing.

- Setting yourself up as a user for this service, after reading our Privacy Policy, including confirming your email address by a two stage process involving a unique code sent to you.
- Setting up a unique password to use these services.
- Expressly providing various items of documentation and answering questions to allow us verify your identity.
- Using your mobile device for two stage authentication

Identification services which allow you to **access** these services

These are services that are as listed on the GOV.UK VERIFY website <https://www.gov.uk/performance/govuk-verify/government-services>

For this purpose, we process a minimal amount of personal data listed under 'Data for contacting you and accessing the service' and 'Data when connecting to our website, including any connected applications'

This purpose includes maintaining your GOV.UK VERIFY account with Post Office Limited, as well as allowing us to diagnose and resolve problems and to deal with security incidents. The permission you

give us for processing your data for these purposes is by **'Consent'**. Where you give us permission by way of **'Consent'** to process your data for these purposes, you have a real choice about how long these permissions last. At any time, you can ask us to stop processing your data for that purpose by withdrawing your **'Consent'**.

However, although we will not process your data for this purpose if you have withdrawn your **'Consent'**, we may still have to process your data under any legal obligations listed in this policy. This means that although you will not be able to access the services, or indeed log into your account, we may still be processing your data for the other purposes.

By logging in to the account login webpage to access these services, including entering a code sent to your mobile device or via the app, you **'Consent'** to the capture and processing of your personal information for the purposes of providing access to identity services as above.

Where you give us permission by way of **'Consent'** to process your data for these purposes, you have a real choice about how long these permissions last. At any time, you can ask us to stop processing your data for that purpose by withdrawing your **'Consent'**. Withdrawing your Consent will mean that we can no longer provide this service to you. You can withdraw your consent by closing your account, or contacting us (see our main Privacy Policy).

Audit and record keeping (Accounting)

For the purposes of invoicing and to fulfil VAT, taxation, accounting and auditing legal obligations, we process your data as required by UK law. The lawful basis of processing is under a **'Legal Obligation'**, and we therefore do not ask for your permission for this purpose.

We are providing this service to you, on behalf of the UK government, and we invoice the government for this, rather than you. This means we must retain all data under "Categories of Personal Data" excluding 'Data for verifying you' to show that we have invoiced the government correctly and have an audit trail of these transactions.

Legal Obligations which the Post Office must adhere to on request

For the purposes of meeting legal obligations under UK law, The Post Office Limited, if instructed to do so, must retain all or some of your data listed under "Categories of Personal Data" for the periods defined in the different laws, as and when a request is made. This might be for example to help fight crime and fraud. Again, for this purpose, we will be

relying on a 'Legal Obligation' to process your data, and we therefore will not need to ask your permission in these circumstances.

Categories of Personal Data

When we provide the services above, we collect different categories of personal data, these are:

Data for contacting you and accessing the service:

Name, including first name, middle name, and surname, address, date you moved into that address, telephone number, alternative telephone number, such as mobile number, email address and password, your marketing permissions, details of when you change any of these details.

Details to support and maintain your account. That is if you report a fault with your account, or have an enquiry, we will capture enough information to allow us to investigate it, and answer your enquiry. Of course, if you provide us with this information, then you will be giving your Consent to process this information to help you. This includes a recorded message via our 'chat-help', or any other correspondence and communication with us, including emails and letters, as well as enquiries in our branches.

Data for verifying you:

Your user name, password, and information used to identify you before disclosing any personal data with you.

Name including forename and middle name, previous names, address, telephone number, title, gender, data of birth, current and previous addresses, mobile phone number, email address, passport details, driving licence details, debit or credit card number and other card details, ID card details, and digital selfie, as well as the specific services you are have chosen, and the level of assurance associated with your account. If you contact us with an enquiry, we may also record your voice and notes about your enquiry, bank account details, and mobile contract information (if you have a mobile contract).

Knowledge based verification information which involves you answering questions and capturing the answers about your financial history which may be recorded with a credit reference agency. However, this is not a credit score or credit check, it is more about checking that you are able to confirm transactions such as what they were, and when they happened, regardless of their nature. It does not matter whether you have a good or bad credit history.

Data when connecting to our website, including any connected applications

A unique identifier generated by us. Your browsing information, that is when you visit our website, the date and time you visited our website, the length of time you were browsing our website, the browsers you use and other information about your device (your terminal equipment) you are using to access our services, for example the operating system, software and hardware on your device. We also collect the MAC address of your device and your IP address, which can tell us your **location** when you connect, or attempt to connect to access our online shop, as well as successful and unsuccessful log in attempts, your password, and changes in passwords to access your account online.

Who we share your data with

We use a number of service providers, or categories of service providers to help us deliver our services to you, and this involves exchanging your data with these providers.

Some of these providers have obligations of their own in terms of processing your data that we provide to them directly, we call these providers 'Controllers'. In combination with reading our Privacy Policy, you should also read their Privacy Policy, to ensure you are fully aware of how and why your data is being processed with them.

These providers' Privacy Policies should be read in conjunction with ours:

- Callcredit (www.callcredit.co.uk), data is obtained from your financial history, and data extracted from your credit file via this credit reference & fraud prevention agency. We share your information only on registration, and not on an ongoing basis. In addition we are obligated to share this link to give you more information about how Credit Reference Agencies process your data - <http://www.experian.co.uk/crain/index.html#question1>.
- Gov.uk checking service. DCS (document checking service) will transfer your personal information to Her Majesty's Passport Office (if you provide your passport as part of this verification process), or the Driver and Vehicle Licensing Agency (if you provide your details as part of the verification process) in order to validate this data.
- Digidentity – who manage the service on behalf of the Post Office <https://www.digidentity.eu/en/home/>
- Her Majesty's Passport Office for verification of your passport if you provide this. <https://www.gov.uk/government/organisations/hm-passport-office>
- DVLA for verification of your driving licence if you provide this. <https://www.gov.uk/government/organisations/driver-and-vehicle-licensing-agency>

- Mitek ID Checker (www.idchecker.nl) – where you choose the option to verify your identity using an app on your mobile device..
- Worldpay (www.worldpay.co.uk) – this allows us to check your details by making a live zero payment transaction, including a bank account check.
- Gov.uk (www.gov.uk) – once you are uniquely identified, we share some of the data as detailed under "Data for contacting you and access to the service"
- Interpol <https://www.interpol.int/> where necessary to cooperate with police authorities around the world
- Fraud protection agencies if we suspect or identify fraud. We will record this, and at our discretion, pass this information to these agencies and other organisations involved in crime and fraud prevention (including the police).
- Law enforcement or regulatory organisations, courts, or other public authorities if we are obliged to share by law.
- Mobile network providers, who we use to check that you have a valid mobile phone contract.

Other service providers, or categories of service providers that we use to process your data on our behalf, will be under our instruction only, these are examples of some of these providers, and they will not be able to use your data for their own purposes.

- Hosting companies, for hosting of our website, and Information technology companies that support us to provide the infrastructure to allow you to access the services
- Digidentity, who provide managed services on our behalf

Retention Periods

*Identification services which allow us to **create** and **verify** your profile.*

All or some of the data listed under "Categories of Personal Data" will be retained for a very short period of time to be able to identify and create your profile. Once you have been verified, we retain this data as detailed below:

- **14 days** for selfies (photos you have taken of yourself)
- **6 months** for copies and/or details of your identification documents
- **7 years** for recording the type of evidence used to identify yourself, e.g. passport, driving licence, and other data type in this category (but not copies of, or details within your id documents).

However, when connecting to our website in order to view and / or purchase merchandise, we only retain data concerning your connection to the

website, as well as information from your devices.

Cookies retention period will depend on the type of cookie, and your chosen preferences.

*Identification services which allow you to **access** to these services*

For this purpose, we retain a minimal amount of your personal data, as we have already verified you. We retain the data under 'Data for contacting you and access the service' and 'Data when connecting to our website, including any connected applications' and this is for a period starting when you apply for our services, during the period you are supplied with our services, and until **7 years after last use**, or until you close your account.

Legal obligations which the Post Office must adhere to on request

For the purposes of meeting legal obligations under UK law, The Post Office, if instructed to do so, must retain all your data listed under "Categories of Personal Data" for the periods defined in the different laws, as and when a request is made. This might be for example to help fight crime and fraud. The retention period can vary according to specific instructions under the law, at the time the instruction is given.

Legal obligation which the Post Office must adhere for invoicing and accounting (audit and record keeping)

For these purposes, we retain your data detailed under 'Data for contacting you and accessing the service' and 'Data when connecting to our website including any connected app' 'for a **period of 7 years** as required under UK law.

Where your data is processed

Post Office Limited processes your data within the EEA only.

Using and analysing your information

The information you provide, as well as the information we collect from 3rd parties, is used to analyse and create a profile, and this includes the history of transactions and events in your life. We need to do this to be sure that you are who you say you are, in other words, verify your identity.

We use this information to make decisions about providing this service to you on behalf of the government. If we can use and analyse your information to be certain that you are who you say you are, this results in a decision of 'yes' to Post Office Limited being able to provide these services. If we are unable to verify that you are who you say you are, from the information we have, and analysing this,

the decision would unfortunately mean that we are unable to provide you with these services.

Credit referencing

In order to process your application for the purpose of 'Identification services which allow us to **create** and **verify** your profile' we will share your personal data with credit reference agencies and fraud protection agencies as a one-off process, and they will provide us with information about you, including your financial history. We need to do this to check your identity, to confirm you are who you say you are. We have to do this on behalf of the government. We do not require a 'Credit Score' to apply for these services, and therefore it does not matter if you have a good or bad financial history. There will be a 'search footprint' placed on your credit file which will be seen by other organisations. The important thing, is that we are able to identify you from events that may be recorded with the credit reference agency. We cannot provide our services without using these agencies.

These agencies will also be linked with information about your spouse or partner, or any financial associate. Before applying for our Services, you must ensure that you also have your spouse/partner/financial associate's permission to share their data.