

## ZENTRY LLC

### PRIVACY POLICY

Zentry LLC is the result of a joint venture between Synchronoss Technologies, Inc. and MCI Communication Services and Verizon Patent and Licensing Inc (collectively “Verizon”); Synchronoss is the majority stakeholder. This privacy policy (the “Privacy Policy”) describes how Zentry LLC and/or its local subsidiary/ies (as applicable) (“we” or “us”) treat information you may provide to us or that we may collect, including how we may use such information, how we protect the security of such information, and how you may change or request that we amend such information from our systems. This includes any information associated directly with you (such as your name, title, email address or phone number) that is supplied to us in conjunction with your use or potential use of our services, known as Universal ID or UID (hereafter “UID”) (the “Service”) as well as information we generate regarding your use of the Service (“Personal Information”).

Except as described in this Privacy Policy, we will not, without your consent sell or rent to any third party any Personal Information collected through the Service.

Please note this website includes hyperlinks to other websites neither owned nor managed by us. Zentry is not associated with these third-party websites and does not review their privacy policies. We cannot guarantee the privacy of any information that may be obtained by third parties at these other websites. We strongly encourage you to review the privacy policies of any website you visit before supplying Personal Information through that website.

**Click a link below for our policy on each topic:**

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**What information does Zentry collect about users of its UID Service and how is this information used?**

This section applies to users of the Zentry Universal IDentity (UID) Service.

Zentry UID provides a cloud-based identity-as-a-service solution that includes identity proofing, credential issuance, strong authentication, and digital signature services. This service shifts complexity from the organization's IT Department to Zentry—allowing the organization to still retain control of access management. Services that now take organizations weeks to perform can be handled in minutes — without paper-based processes or manual updates for multiple applications.

In summary, the UID solution provides:

- Cloud-based identity solution that helps reduce the risk of identity fraud by providing real-time transactional identity assurance
- NIST Level 3 compliant ID Proofing and Authentication services on-demand identity-as-a-service, without the complexity and expense of on-premises hardware and software
- Rapid-deployment, fast identity proofing and credential issuance
- Positive user experience for credential provisioning and transactional authentication
- Strong support for open standards, including SAML and OATH, to provide compatibility with third-party products and services
- Standard authentication experience across applications

In delivering the UID solution, Zentry may capture the following data elements which may be considered Personally Identifiable Information (PII) or Personal Health Information (PHI):

### **Personally Identifiable Information**

- a) First Name
- b) Middle Name
- c) Last Name
- d) Street Address
- e) City
- f) State
- g) Zip Code
- h) District
- i) Country
- j) Email address
- k) Phone/Cellphone Number
- l) Fax Number
- m) Identification Info: Passport #, Driver's License #
- n) Gender
- o) Username
- p) Employer Enterprise ID
- q) Birthplace
- r) Date of Birth
- s) Credit Card Account Number (Not retained; only used for IDP transmission)
- t) Social Security Number

## **Personal Health Information**

- u) DEA/Healthcare License # (For clients enrolled in Healthcare vetting)
- v) Digital Certificate

This information may be used in the following ways:

### Identity Proofing

Universal ID includes identity proofing through an online antecedent process and enterprise antecedent data load. The identity proofing process may entail verification of the information you supply against external information sources.

Very importantly, the focus of this verification is to confirm your identity is as you have presented, not to ensure you align to any specific demographic grouping or financial status. Financial account information, for instance, is reviewed to confirm the stated financial account associated to your name and address; we do not perform actual credit checks or verify financial standing in any way.

Universal ID also offers a web-based profile page where you can manage provided information, reset passwords and PINs, and register new contacts and passcode delivery devices. This enables you as a user of UID to have maximum visibility and control over your personal information.

### Credential Provisioning

After you are successfully identity proofed, you will be issued a credential. To enable you to easily use this credential, UID enables you to associate ‘devices’ you already possess - such as an email or mobile device - to this credential.

### Authentication

Universal ID provides a strong, yet flexible authentication. It supports flexible enterprise and user preferences for managing both first and second factor authentication, as well as the delivery of one-time passcodes within timeout and lockout policies, limiting organizational risks. In addition, the UID solution is compliant with authentication requirements for NIST Level of Assurance 3.

### Digital Signature Services

Universal ID includes optional digital signature services that enables you to apply digital signatures to documents and Adobe PDFs. On a document, the digital signature supported by UID is legally recognizable as a wet signature.

### Universal ID Mobile Application

Universal ID includes a mobile application available on Google Android and Apple iOS devices (iPhone, iPad, iPad mini, and iPod Touch), that incorporates several key capabilities:

- A soft token that generates one-time passcodes used for authentication transactions

- A QR code scanner from which a user can scan a QR code as a method of authentication
- The ID Message Center - an application through which transactions are sent, viewed by the recipient, and then approved or rejected, as applicable. This application is typically used in combination with the digital signing capability of the Universal ID solution.

### **How does Zentry protect the security of the information I provide?**

We consider any information provided by you to be confidential, unless it is publicly available or has already been provided to us without any confidentiality restriction. Zentry takes appropriate and reasonable precautions and has implemented appropriate administrative and technical procedures to protect the security of information provided or generated through the Service. We permit persons working for us to access and use information you provide only to serve legitimate business and service needs consistent with this Privacy Policy.

Notwithstanding any other provision of this Privacy Policy, Zentry may disclose contact information and other information collected about you (1) in response to a subpoena, search warrant, court order, exchange rule, other legal process or where Zentry is otherwise required to do so in accordance with locally applicable law and where applicable, our internal policy on access by government or regulatory authorities; and (2) in its sole discretion if it believes such disclosure is appropriate in connection with an official government or regulatory investigation, or under exigent circumstances in response to a perceived significant threat to a person's health or property.

### **What about the transfer of information to other countries?**

Your information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using our products and services (including the Service), you consent to the transfer of information to countries outside of the location(s) of your business, including the United States and countries within the EEA, which may have different data protection rules than those of your country.

Where such transfers of your Personal Information are made they will be made in accordance with applicable law. Where your Personal Information is transferred outside the European Economic Area, this may include transfers on the basis of a European Commission approved contractual clauses, or as is otherwise permitted by applicable law.

### **How can I change, update, or delete my contact information, or request that I not be contacted for non-support purposes?**

You may elect to avoid future communications from Zentry by sending an email to [opt-out@synchronoss.com](mailto:opt-out@synchronoss.com) that includes your electronic mail address; provided, Zentry reserves the right to use your contact information to send you important information (such as, for example, information about changes to this Privacy Statement).

Upon request Zentry will provide you with information about whether we hold any of your personal information. If you wish to have access and correct, update or delete inaccurate data, please [contact us](#). We will respond within 30 days to your inquiry.

### **What rights do I have about the use of my information?**

If you are a resident of the European Economic Area (“EEA”), you may have the right to ask us to access, review, correct, update, change or delete the personal information which we have collected about you, or limit how we use it. If you believe any information we hold about you is incorrect, or if you want to access the information we hold about you please contact us as described below (see "How can I contact Zentry with questions about this Privacy Policy?").

### **How will I be notified of changes to this Privacy Policy?**

From time to time, we may change and/or update this Privacy Policy. We recommend you regularly review this page.

### **How can I contact Zentry with questions about this Privacy Policy?**

If you have questions about this Privacy Policy and our information practices, please contact us, Zentry LLC (a subsidiary of Synchronoss Technologies Inc.) by email at: [legal@synchronoss.com](mailto:legal@synchronoss.com)