

# TrustID Privacy Notice – Identity Document Checking Services

## Our contact details

Name of controller: TrustID Limited

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

Registered Address: Kings Court, Water Lane, Wilmslow, Cheshire, SK9 5AR

Phone Number: 0118 466 0822

General Email: [info@trustid.co.uk](mailto:info@trustid.co.uk)

Data Protection Email: [dpo@trustid.co.uk](mailto:dpo@trustid.co.uk)

Our data protection officer (DPO): Mr. Mathew Parry, Kings Court, Water Lane, Wilmslow, Cheshire, SK9 5AR.

## The type of personal information we collect

We collect certain personal information in order to provide identity document checking services to our customers. Under the General Data Protection Regulation (as incorporated into UK law by the Data Protection Act 2018), TrustID acts as a **data processor** and our customers act as the **data controllers** of your information. This means that our customers determine the lawful basis and purpose for processing your personal data. If you are based in the UK or EEA, you should refer to your organisation's privacy policy for details of the lawful basis they rely upon. If you are a US resident, our customer may also have obligations under state-specific privacy laws (such as the California Consumer Privacy Act), and we recommend that you review their privacy policy for more information.

The information we collect depends on the service requested by the customer. Every check begins with an image of an identity document, which we verify as genuine. This may be provided as a standalone service or used to support additional checks. For example, some customers may request a facial match, where we compare the photo on the identity document with a selfie provided by the individual. Customers may also request an address verification, in which case we check whether there are records linking the individual to the 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 previous)
- 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 may either provide your information to us directly for the purposes they have agreed with you, or they may send you a link that allows you to upload your information to TrustID yourself. We then use this information to carry out the checks the customer has contracted us to perform.

TrustID may process your information for one or more of the following purposes:

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

Where required to deliver these services, we will share your information with approved third-party processors. We will also share your information and the results of the checks with the TrustID customer. A current list of TrustID sub-processors is available here: [Processors - TrustID](#)

Regardless of how we receive your information, TrustID performs the contracted checks and returns the results solely to the TrustID customer. It is then the customer's responsibility to decide whether or not to proceed with your application.

Under the UK GDPR, we rely on Article 6(1)(b) (Contractual Obligation), where processing is necessary to fulfil a contract, or on Article 6(1)(f) (Legitimate Interests), where processing is

necessary for our customer's legitimate business purposes. Where criminal record information or biometric data (considered Special Category Data) is processed, we either on Article 9(2)(a) (Explicit Consent) or, where the processing is required to meet legal obligations in relation to employment, on Article 9(2)(b) (Employment, social security and social protection law). You may withdraw your consent at any time, and this will not affect the lawfulness of any processing carried out before consent was withdrawn.

## Location of storage and international transfers

Your information is securely stored in the United Kingdom, with some processing carried out in EEA countries that are recognised by the UK Government as providing adequate protection. In exceptional cases, such as during an investigation, our sub-processor LexisNexis Risk Solutions may transfer data to its parent company in the United States. These transfers are safeguarded under the UK-US data bridge (the UK extension of the EU-US Data Privacy Framework), and LexisNexis Risk Solutions is certified under this framework through its parent company, RELX. ([Data Privacy Framework List](#)).

## Retention of your personal information

We retain your information for as long as required under our contractual agreement with the TrustID customer. Once this period ends, your information is permanently and irretrievably deleted. By default, we retain data for 7 days, although the TrustID customer may request early deletion if the information is no longer needed. The customer may also extend the retention period, as they are the controller of your data. For confirmation of the exact retention period, you should contact the organisation that requested the checks directly.

Where LexisNexis Risk Solutions (LNRS) is engaged to provide address verification or PEP & Sanctions screening, the data is retained by LNRS for 6 years. This period reflects the maximum time allowed for bringing contractual legal claims and ensures LNRS can defend against any such actions.

Where a DBS application has been submitted via uCheck, the following retention schedule applies within their platform:

- 6 months after completion date – application is fully and securely deleted.

Where a DBS application has been submitted via Matrix Security Watchdog, the following retention schedule applies within their 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 a number of rights over your personal information. These include the right to access your data, the right to have it corrected or deleted, the right to restrict or object to its processing, and the right to request that it be transferred to another party (data portability).

If you wish to exercise any of these rights, please contact TrustID using the details below. In most cases, we will need to inform the TrustID customer, as they are the data controller and will be responsible for fulfilling your request. This reflects the fact that, where we process your data on behalf of a customer, they hold primary responsibility for responding.

You will not be charged for exercising your rights. Once your request is received, the controller must respond within one month.

Requests can be submitted by email to [dpo@trustid.co.uk](mailto:dpo@trustid.co.uk), or by post to:  
TrustID Ltd, The Blade, Abbey Street, Reading, Berkshire, United Kingdom, RG1 3BA.

For our records, we keep a log of all data subject rights requests, including your name, the details of your request, and how we responded. We keep this log indefinitely. However, your original request will be retained for no longer than three months after the request has been closed.

## 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](mailto: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 16 of this privacy notice and is dated 20 August 2025. 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.