

Privacy Policy

Last updated: 27 May 2026

This Privacy Policy describes how we process personal data when you interact with our Website and Services.

1. Introduction

Obsidion Labs Limited (“**Obsidion Labs**,” “**our**,” “**us**,” or “**we**”), a company incorporated and registered in the British Virgin Islands, with company number 2169748 and whose registered office is at Intershore Chambers, Road Town, Tortola, British Virgin Islands. For the purpose of applicable data protection laws, we are the data controller.

This Privacy Policy (“**Privacy Policy**”) sets out the basis on which Obsidion Labs will process your personal data when you (“**you**”) access our website located at <https://zkpassport.id/> (“**Website**”) or interact with us through the services we provide to you (the “**Services**”).

The privacy and security of your information is important to us. Before engaging with us or submitting personal data to us, or using the Services, please review this Privacy Policy carefully.

2. Personal Data We Do Not Collect

ZKPassport is designed so that the data extracted from your identity document is encrypted and processed locally on your device and never leaves it; only the proofs and the attributes you choose to share are transmitted to the application requesting verification.

3. Personal Data We Collect

We may collect information, including personal data, in various ways and from different sources depending on how you interact with us and use the Services. This includes any information which, alone or in combination with other information, can be used to directly or indirectly identify you (“**Personal Data**”).

The categories of Personal Data that we collect from you depend on your interactions with us and may include the following:

Information You Provide to Us.

We may collect directly from you any contact information that you choose to give us, including your name, title, company, and email addresses, through communications, requests, and support if you contact us by email, mail, or using the “Contact Us” form available on our Website.

Information Collected Automatically.

When you access the Website and use our Services, we may automatically collect the information sent to us by your computer, mobile phone, or other device using cookies and other types of technologies. This includes information such as your IP address, device and browser types, identifiers, software and system type, and information about your access and use of the Website. For more information, please see the “Cookies Policy and Other Tracking Technologies” section below.

Information Collected from Third Parties.

We may collect additional data from third parties such as messaging services (e.g., Discord) or other third-party websites (e.g., LinkedIn). As we do not control third-party websites where these are involved, please refer to their respective privacy notices.

4. Why and How We May Use Your Personal Data

We will only use your Personal Data when the law allows us and in accordance with the practices described in this Privacy Policy. The purpose for which we collect your Personal Data may vary depending on the circumstances.

We may use your Personal Data in order to perform our contract with you, such as providing you with our Services, other content, and Website functionality.

We obtain your consent to process your Personal Data to sign you up for our newsletters or alerts about our Services and, if you opted into marketing, to communicate with you about products, services, marketing, promotions, events and other news and information we think will be of interest to you.

In order to be responsive to you, to provide effective Services to you, and to maintain our business relationship, as a matter of our legitimate interests, we will use your Personal Data to:

- maintain the safety and security of our users, the Website, our Services, and our business;
- send you announcements in relation to security, privacy or administrative-related communications (these communications are not marketing-orientated);
- improve our Services or products or build new products or services.

In addition, we will use some or all of the above information to comply with any applicable legal obligations, to enforce any applicable terms and conditions and/or terms of service, and to protect or defend the Services, our rights, the rights of our users, or others.

5. Your Choices and Rights Over Your Personal Data

You have certain rights in connection with our processing of your Personal Data, as listed below. Please note these rights are subject to certain conditions and limitations under the law. If you exercise such rights, it may affect our ability to provide our products and Services

to you. Please note that processing your request may take some time, consistent with terms under applicable data protection law.

- **Access:** You have the right to know whether and how we process Personal Data about you and request a copy of such Personal Data;
- **Rectification:** If you consider that any Personal Data we process about you is incorrect or incomplete, you can request that we correct or supplement it by emailing us and explaining why the Personal Data is inaccurate or incomplete;
- **Erasure:** You can request that we erase some or all of the Personal Data we process about you;
- **Objection:** You can object to the processing of your Personal Data on the basis of our legitimate interests. You can object to direct marketing at any time, and you can unsubscribe from our marketing updates by clicking on the unsubscribe link at the bottom of any marketing message;
- **Restriction:** You can ask us to restrict the processing of your Personal Data we process about you, other than for storage purposes, in certain circumstances;
- **Portability:** You can request the transfer of your Personal Data to a third party, in certain circumstances and with certain exceptions;
- **Consent:** When we rely on consent as a lawful basis to process your Personal Data, you may withdraw it at any time by contacting us at company@zkpassport.id.

Application of the above rights may vary depending on the type of Personal Data involved and our particular legal ground for processing your Personal Data as described above in the “Why and how we may use your Personal Data” section.

If you wish to exercise your rights or have any questions, you can contact us at company@zkpassport.id.

6. Cookies Policy and Other Tracking Technologies

We may use cookies and similar tracking technologies (collectively referred to as “Cookies”) to track the activity on our Website to improve and analyse our Services. For instance, we may use Cookies to collect information about how you engage with our Website. Cookies are small pieces of data placed on your computer, phone, or similar device when you use that device to visit or use our Services. You will be presented with a cookie banner or other tool to provide permissions before we or our service providers set Cookies that are not strictly necessary.

If you do not accept Cookies, however, you may be unable to use some portions of our Website.

The cookies we may use include the following:

Essential Cookies

which are essential to the functioning of our Services, to provide a service requested by you (e.g. to enable you to log into secure areas of the Website, use a shopping cart or make use of e-commerce payment processing services) or to comply with the law (e.g. the security requirements of data protection law). We do not need to obtain your consent in order to use these Cookies and these Cookies cannot be turned off as we cannot provide the Services without them.

Statistics Cookies

also known as “performance cookies,” which collect information about how you use the Website, such as which pages you visited, which links you clicked on and how long you stayed on the website. The Statistics Cookies help us monitor the effectiveness and performance of our Website and consider improvements to further tailor it for our visitors. Collecting Statistics Cookies is done on an anonymous basis and does not link any personal information you provide with cookie data. You can opt out of any Statistics Cookies through our cookie banner.

Google Analytics and/or Matomo.

We may use Google Analytics and/or Matomo to track aggregated, anonymised website behaviour, such as your IP addresses, geographical location, and what pages visitors looked at, for how long, etc. This information is important to us for improving the user experience and determining site effectiveness. You can choose to not receive Google Analytics cookies by not opting in to Statistics Cookies through our cookie banner. Google also offers an opt-out feature that lets you opt-out of use of your information for interest-based advertising. We have included the applicable link below to facilitate this election if you choose to do so: Google: <https://adssettings.google.com>

To learn more about cookies and other tracking technologies, visit <https://www.allaboutcookies.org>. Please note that the tracking technologies we use may change from time to time.

Do Not Track (“DNT”) Signals are privacy preferences that individuals can set in some web browsers and provide an individual with the opportunity to opt-out of tracking by websites and online services. For more details, including how to turn on Do Not Track, visit <https://www.eff.org/issues/do-not-track>.

7. How We Share Your Personal Data

We do not use or share your Personal Data with others except as described in this Privacy Policy. In certain circumstances, we may share your Personal Data with third parties with your consent, as necessary, or as otherwise required or permitted by law. Specifically, we share your Personal Data:

For legal and security reasons and to protect our Services and business,

in our legitimate interests or as required by law. We will share your Personal Data with regulators, law enforcement agencies, public authorities, or any other relevant organisations:

(i) in response to a legal obligation; (ii) if we have determined that it is necessary to share your Personal Data to comply with applicable law or any obligations thereunder, including cooperation with law enforcement, judicial orders, and regulatory inquiries; (iii) to protect the interests of, and ensure the safety and security, of us, our users, a third party or the public; (iv) to exercise or defend legal claims; and (v) to enforce our terms and conditions, other applicable terms of service, or other agreements.

With any member of our group,

in our legitimate interests to maintain an effective Service. We may share your Personal Data with companies within our corporate family.

In connection with any due diligence process

in relation to a partnership, financing arrangement, or potential transaction, or other business transaction or re-organisation, in our legitimate interests to provide an effective Service. We will share your Personal Data with a prospective buyer, seller, new owner, or other relevant third party as necessary while negotiating or in relation to a change of corporate control such as a restructuring, merger, or sale of our assets.

8. Transfer of Personal Data

Your Personal Data may be accessed by staff, stored with or transferred by our suppliers in a destination outside the UK or the EEA (including the United States and the British Virgin Islands) where data protection laws may be of a lower standard than in the UK or the EEA. Regardless of location, we will impose data protection safeguards similar to those we deploy inside the UK and the EEA.

For any transfers of Personal Data outside the EEA or the UK, the data transfer will be subject to the European Commission's or the relevant UK competent authority's approved contractual terms, as applicable, that impose equivalent data protection obligations directly on the recipient. Please contact us if you would like further details or a copy of the safeguards applied to the export of your Personal Data.

9. Retention of Your Personal Data

We will retain your Personal Data as follows:

- If you contact us, we will keep your data for 12 months after you contact us; your technical usage information for 12 months; and data on your use of our Website and our Services is retained for 12 months.

We retain the Personal Data we collect to the extent necessary to fulfil the purposes described in this Privacy Policy, to resolve disputes, enforce our Terms of Service, or other actions permitted by law or regulation. If you stop using our Services we may store your Personal Data in an anonymised format, outside the scope of data protection legislation; we may use this information indefinitely without further notice to you.

10. Security

Obsidion Labs takes the protection of your information very seriously. We have implemented appropriate administrative, physical, and technical safeguards to protect and secure your Personal Data. However, no data transmission over the internet is ever 100% secure. As a result, while we strive to protect your information, we cannot guarantee or warrant the security of any information you transmit to our Website.

11. Children's Privacy

We do not knowingly collect Personal Data of children under the age of 18. If you believe we have collected Personal Data about your child, you may contact us at company@zkpassport.id and request that we remove information about them.

12. Changes and Updates to This Privacy Policy

We reserve the right to change, modify, add, or remove portions of this Privacy Policy at any time. We, therefore, encourage you to review it from time to time to stay informed of how we are processing your Personal Data. If we make a material change to the way we intend to use your Personal Data, we will notify you in accordance with applicable law.

13. Complaints

If you have complaints about how we process your Personal Data, please contact us at company@zkpassport.id, and we will respond to your request as soon as possible. If you think we have infringed data protection laws, you can file a claim with the data protection supervisory authority in the country in which you live or work or where you think we have infringed data protection laws, or with the UK Information Commissioner's Office, as applicable to you.

14. Contact Us

If you have any questions regarding this Privacy Policy, please contact us at company@zkpassport.id.