ADACOM

SECURITY BUILT ON TRUST

# REMOTE IDENTITY PROOFING

## Version 2.1

## 1.08.2026

| Version History | | |
|---|---|---|
| Date | Version | Changes |
| 27.10.2021 | 1.0 | Initial Document |
| 01.10.2024 | 1.1 | Removal of the option for video identification via Agent and update the paragraph of personal data protection |
| 27.02.2026 | 2.0 | Updated remote ID verification platform (Onfido) |
| 1.08.2026 | 2.1 | Removal of solemn declaration which was necessary for old type Greek ID |

Please consult the list of acceptable ID documents for remote ID proofing here.

ADACOM uses the following process for remote ID proofing:

## Automated video

With this method, the Subscriber's data is collected by an information system without the presence of an agent; however an agent will check this data at a later time and approve the video session.

- ✓ No appointment with an agent is required as the process is fully automated.
- ✓ In order to perform the identity verification with a satisfactory degree of certainty, good sound and video quality are required.
- ✓ The automated video lasts approximately 3 minutes.
- ✓ It is available 24x7.
- ✓ If the automated video is unsuccessful multiple times, the Subscriber has the option to be identified using other methods. For more information, please visit the following link here

## Terms for Remote ID Proofing

1. Subscribers shall strictly follow the instructions indicated by ADACOM. Remote Identity Proofing shall be performed with such sound and video quality that shall allow the verification of the natural person who is being identified ("Identified Person") with a satisfactory degree of certainty.
2. The identification document presented by Subscriber shall be original and contain advanced security features.
3. During the Remote Identity Proofing process, a video of the Identified Person shall be taken, as well as snapshots from both sides of the ID document containing their details.
4. To complete the Remote Identity Proofing, a unique One Time Password (OTP) will be sent from ADACOM to the Identified Person via SMS, which is automatically and randomly generated. The process will be considered complete only after the OTP is confirmed by the system.
5. The Identified Person shall provide their explicit and special consent regarding the collection, recording and retention of all data and files required for the Remote Identity Proofing.
6. **Personal Data Protection**

   Your personal data, which are processed by ADACOM for the issuance of a qualified certificate for electronic signature or qualified certificate for electronic seal, are stored in a physical and electronic record, which is protected with all necessary technical and organizational measures and is accessible only by persons specifically authorized for this purpose. ADACOM will retain your personal data for a period of at least seven (7) years from the date of expiry or revocation of your qualified certificate, in accordance with the eIDAS Regulation and national regulatory requirements. If a qualified certificate is not eventually issued, the retention period of the data in the above record is two (2) years. In the case of remote identity proofing, if for any reason the process is not completed (i.e. you are disconnected from the video session), your personal data will not be recorded by ADACOM.

   You will be required to provide your express and specific consent for the collection and retention of all necessary data and documents, e.g., name, surname, identity document details, snapshot of your identity document, image of your face, video (including audio) recording of your identity proofing session. Your identity is verified by comparing facial biometric data extracted from the photo/video of your face, to facial biometric data extracted from the photo in your identity document. The authenticity of the images, videos and identity documents is also evaluated, in order to detect whether there is a genuine human or physical document in your photos/videos or signs of tampering. If you do not consent, we will not extract or process your biometric data, nor verify your identity.

   ADACOM uses the "**Onfido**" platform of Entrust, who acts as a processor of your personal data related to the remote identity proofing, according to ADACOM's

instructions. ADACOM has entered into a data processing agreement with this third-party processor, in compliance with GDPR, to safeguard your personal data. After successfully completing your remote identity proofing, your personal data will be securely maintained by ADACOM for the period described above. ADACOM as Controller remains responsible toward you for the processing of your personal data undertaken by this third party. For further information on how Entrust processes your personal data, please visit the following link:
https://www.entrust.com/sites/default/files/documentation/licensingandagreements/product-privacy-notice-identity-verification-services.pdf

**7. Compulsory Termination**

The Remote Identity Proofing shall be terminated in the following cases:

**(a**) When identity proofing is not feasible due to poor lighting, poor image and/or sound quality, interruptions in data transmission or interruptions in the flow of the procedure.

**(b**) When the identification document is not suitable.

**(c)** When there is doubt as to the validity and reliability of the identification document.

**(d)** When there is doubt about other elements that are examined during the procedure.

**(e)** When it is not possible to communicate with the Subscriber for reasons other than those mentioned in case **(a)** above or when a third person, other than the Subscriber, appears during the procedure.

**(f)** When there are indications that the Subscriber is under duress, psychological or mental disorder or substance abuse.

In cases **(c)** and **(d)** above, the remote identity proofing process must be terminated and may be conducted using an alternative method from those listed in Section 4.1. In all other cases, the process is interrupted and may be repeated from the beginning. In case b. the process may be repeated if an appropriate ID document is submitted.
Remote Identity Proofing is available in Greek and English.