

PAYSEND PRIVACY NOTICE FOR US CUSTOMERS

Under Federal law, you have the right to limit the sharing of some of your personal information and we have a duty to inform you about how and why we collect your personal information, why we may share it, as well as how we protect it from unauthorized disclosure. Let's get down to it, and if you have any questions or concerns, do get in touch with us.

Who we are and the Privacy Notice that applies to you

We're **Paysend US LLC**, a money transfer and payment services provider. We offer a variety of payment solutions through our platform, which you can access through our website (paysend.com), and our Mobile App. We hold Money Transfer Licenses in various states, and where we do not hold such licenses, we are able to provide you with licensed services through our sponsoring bank, Central Bank of Kansas City (**CBKC**). The Privacy Notice that applies to you, is dependent upon where you live.

This Privacy Notice

This Privacy Notice applies to you if you live in the following states: Alabama, Alaska, Arizona, Arkansas, Colorado, Connecticut, Delaware, District of Columbia, Florida, Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, New Hampshire, New Jersey, New Mexico, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, U.S. Virgin Islands, Utah, Vermont, Virginia, Washington, West Virginia, Wisconsin, and Wyoming states.

CBKC GLBA Privacy Notice

If your Paysend Account has an address based in the following states, CBKC GLBA's Privacy Notice will apply to you: California, Hawaii, Nevada, New York, and Massachusetts. You can find CBKC GLBA'S Privacy Notice here: [CBKC GLBA Privacy Notice](#)

Who are you?

This question may sound a little odd, but you could be one of our direct customers, a customer of one of our business clients, or a visitor using our services for the first time. Regardless of who you are, we protect your personal information in the same way. The only difference rests on whether we're making the decision as to how your personal information is handled (which is what we do if you're a direct customer and visitor), or whether we're told to handle your personal information (which is our role where you're a customer of one of our business clients). In case of the latter, you may wish to go to our business client who provides you with services, if you have queries about your personal information, as they'll be primarily responsible for protecting your personal information from unauthorized access and use (although this responsibility passes down to us through the business contracts we have with our business clients).

Why do we collect your personal information?

Broadly, we collect your personal information to provide you with our services. There are certain pieces of information that we need from you to allow us to carry out our services (for example, to process a transaction request for you).

More specifically, to give effect to the above and to assist you in maximizing your registration with us we also collect, use and store your information for the following purposes:

- To process your transactions
- To verify your identity, for example, when we request government-issued identification numbers, or when you provide your Biometric Data (facial scan images(s)) so that we can verify the ID documents you provide to us against your biometric identifiers
- To improve, personalize and facilitate your use of our services - for example, when you sign up for a Paysend Account, we may associate certain information with your new account, such as information about prior transactions you made using our services
- To measure, customize, and enhance our services, including the design, content, and functionality of the mobile application and Website
- To improve our customer services, track and analyze trends and service usage
- To send periodic emails, news, and information, or to conduct surveys and collect feedback about our services
- To communicate with you about products, services, contests, promotions, discounts, incentives, and rewards offered by us and select partners, based on your communication preferences (**Marketing Notifications**)
- To communicate with you about any important service updates (e.g.: update to our terms or policies) as well as your transactions, based on your communication preferences (**Service and Transactional Notifications**)
- To administer our internal information processing and other IT systems, protect our rights or property, or the security or integrity of our services
- To operate our website and services, including to ensure their security
- To maintain back-ups of our databases and to keep the records in accordance with our internal policies and procedures and the applicable law
- To communicate with you, including to deliver the information and support you request, including technical notices, security alerts, and support and administrative messages, to resolve disputes, collect fees, and provide assistance with any issues you may have
- To comply with applicable laws and regulations, and to establish or defend against legal claims
- To obtain or maintain insurance coverage, to manage risks, or obtain professional advice
- To comply with our obligations either required by law or by written agreements with third parties
- To enforce the provisions of our Terms of Service or other applicable agreements or policies
- To investigate, detect, and prevent fraud, security breaches, and other potentially prohibited or illegal activities

How do we collect your personal information?

We collect your personal information either directly from you when you register with us, from our business clients with whom you have a relationship, and who may pass on your personal information so that we can help them deliver their services to you, or from financial institutions and third-party verification services when we're verifying your identity, which includes taking facial scan image(s) of you (which is part of our onboarding process) or during your account verification process (when you call us or make a transaction request for instance). We also collect your personal information if you join a loyalty program, enter a promotion, register for marketing communications and email alerts.

What personal information do we collect from you or about you?

Your personal information that we collect, store and use may be any of the following:

- Identification information, such as your name, email address, home address, phone number, and date of birth, along with identification details of documents confirming your ID, Biometric Data (specifically your facial scan image(s) to verify the scan against the ID documents you provide to us), and home address
- Financial information, including bank account, payment card numbers and bank statements
- Information about when and where your transactions occur, the names of the transacting parties, a description of the transactions, the payment or transfer amounts, billing and shipping information, and the devices and payment methods used to complete the transactions
- Information about the location and specifics of your device, including your hardware model, operating system and version, unique device identifier, mobile network information, and information about the device's interaction with our services. We may also identify other software running on the device for anti-fraud and malware-prevention purposes (but will not collect any content from such software)
- Information about how you use our services, including your access time, browser type and language, and Internet Protocol (**IP**) address
- Information about you from third parties, including third-party verification services, credit bureaus, mailing list providers, and publicly available sources (where lawful, this information may include your government-issued identification number)
- Information collected by cookies and web beacons (defined below), including using web beacons and sending cookies to your device (for more information on this please see our [Cookies Policy](#))
- Pictures of your ID, utility bills, and other documents as may be requested by us
- Your employment information
- Information contained in or relating to any communication that you send to us with or without our request, including the communication content and metadata (meaning records) associated with the communication
- Other information you provide when you participate in contests or promotions offered by us or our partners, respond to our surveys or communicate with us

How do we safeguard and store your personal information?

We take reasonable measures, including administrative, technical, and physical safeguards (which are subject to periodic changes), that comply with Federal law, to protect your information from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. We hold the information at our own premises with the assistance of third-party service providers, or outside our own premises in data hosting facilities where your personal information is encrypted for security. We restrict the access of your personal information to our employees, contractors, and agents who need to know that information to transmit, store, or process it, and these individuals are subject to contractual confidentiality obligations consistent with this Notice and may be disciplined or terminated if they fail to meet these obligations.

Our third-party service providers store and transmit personal information in compliance with this Notice and other appropriate confidentiality and security measures.

How long do we keep hold of your personal information?

We'll hold your personal information for the period in which your account is active. We also hold your information for seven (7) years from the date of your last use of our services, unless otherwise required by applicable law. We do not retain or store your bank card or bank account information unless we're legally required to do so. We may, however, have to retain your personal information where this is necessary to comply with our legal obligations, for anti-fraud protection, and anti-money laundering purposes, to establish or defend against legal claims, and to protect your vital interests or the vital interests of another person.

Who do we share your personal information with?

As a financial company, we need to share your personal information to provide you with our services. Financial companies are allowed to share their customers' personal information in certain circumstances. We detail these in the table below, as well as inform you what we do share, who with, and whether you can limit this sharing.

Federal laws give you a right to limit the sharing of your personal information where: (1) the sharing is for affiliates' everyday business purposes – specifically information in relation to your creditworthiness, (2) the sharing is for affiliates to use your information to market to you, and (3) the sharing is for non-affiliates to market to you.

Reasons we can under law share your personal information	Specifics (who we share it with and purpose)	Do we share this?	Can you limit the sharing?
<p>For everyday business purposes</p>	<ul style="list-style-type: none"> • Our suppliers or subcontractors as reasonably necessary for providing our services to you • Our suppliers who verify your identity for us. This helps us protect your account and ensures we comply with various laws. To verify you, we may capture your facial scan images and process your biometric identifiers. For more information about how we handle your Biometric Data, please refer to our Facial Scan Policy. Our supplier for this purpose is Onfido. • Our payment services providers as necessary for processing and refunding your payments, dealing with complaints and queries relating to such payments • Our partners, governmental bodies and regulatory authorities, judicial bodies, our associates, agents, attorneys or other representatives for compliance with our legal obligations, to establish or defend against legal claims • Other users of our services with whom you interact through your own use of our services (for example, in instances where you make a transaction) • Other users of our Services, who have you in their phone contacts list, so they may see that you are using our services • Credit reference agencies and fraud prevention agencies, including the TransUnion Group of Companies - please refer to the TransUnion Privacy Notice for further information 	<p>Yes</p>	<p>No</p>

<p>For marketing purposes</p> <p>Including offering of our services and products, for promotions, notifications of future launches or promotions</p>	<ul style="list-style-type: none"> • Our business partners that run advertising campaigns, contests, special offers, or other events or activities in connection with our services • Third-party service providers to deliver content and advertisements in connection with our services and to provide anonymous site metrics and other analytics services. These third parties may use cookies, web beacons, and other technologies to collect information, such as your IP address, identifiers associated with your device, other applications on your device, the browsers you use to access our services, webpages viewed, time spent on webpages, links clicked, and conversion information (such as transactions entered into). This information may be used by us and third-party service providers on our 	<p>Yes</p>	<p>Yes</p> <p>(You can opt-out of this sharing by contacting us through one of the ways provided in the Questions r</p>
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	<p>behalf to analyze and track usage of our services, determine the popularity of certain content, deliver advertising and content targeted to your interests, and better understand how you use our services. The third-party service providers we engage are bound by confidentiality obligations and applicable laws with respect to their use and collection of your personal information. This Notice does not apply to third-party cookies, web beacons, or other tracking technologies, which are covered by such third-parties' privacy policies</p>		<p>Concerns section below)</p>
<p>For joint marketing with other financial companies</p>		<p>Yes</p>	<p>No</p>
<p>For our affiliate's everyday business purposes (including transaction information and your experience)</p>	<ul style="list-style-type: none"> • Our group companies, including our affiliates, for rendering our services, compliance with applicable laws and improving the quality of our services 	<p>Yes</p>	<p>No</p>
<p>For our affiliate's everyday business purposes (specifically information regarding your creditworthiness)</p>	<ul style="list-style-type: none"> • Our group companies including affiliates, for compliance purposes 	<p>No</p>	<p>Not applicable as we do not share</p>
<p>For our affiliates to market to you</p>	<ul style="list-style-type: none"> • Our group companies, including our affiliates 	<p>Yes</p>	<p>Yes</p> <p>(You can opt-out of this sharing by contacting us through one of the ways provided in the Questions or Concerns section below)</p>

For non-affiliates to market to you	Not applicable	No	Not applicable as we do not share
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Definitions

Affiliates: Companies that are related by common ownership or control. They can be financial and non-financial companies and comprise companies in the Paysend Group of companies.

Non-affiliates: Companies not related by common ownership or control. They can be financial and non-financial companies. Paysend does not share your personal information with non-affiliates so they can market to you.

Joint Marketing: A formal agreement between non-affiliated financial companies that together market financial products or services to you. Our joint marketing partners may include banks, credit card companies, and other financial companies.

What are your opt-out and deactivation options?

If you wish to deactivate your Paysend Account, you may do so by contacting our customer service. We may retain archived copies of the information and any transactions or services in which you may have participated for a period of time that is consistent with applicable law, or as we believe is reasonably necessary to comply with applicable law, regulation, or legal process, to prevent fraud, to collect fees owed, to resolve disputes, to address problems with our services, to assist with investigations, to enforce our Terms of Service or other applicable agreements or policies, or to take any other actions consistent with applicable law.

If you do not consent to the collection of the device location information, you may be unable to use our corresponding services. You can stop our collection of location information at any time by changing the preferences on your mobile device. If you do so, some of our mobile applications will no longer function. You may also stop our collection of your location information by uninstalling our mobile application from your device.

Some of the cookies we use are stored on your device by us, while others may be stored on your device by third parties who deliver services on our behalf. Most web and mobile device browsers are set to automatically accept cookies by default. However, you can change your browser settings to prevent automatic acceptance of cookies, or to notify you each time a cookie is stored on your device.

You may opt out of receiving SMS, push and email Marketing Notifications from us (as applicable to your communication preferences), by following the instructions in those messages or by changing your notification settings by logging into your Paysend Account. If you decide to opt-out, we may still send you Service and Transactional Notifications (these are non-promotional communications such as service messages, including digital receipts and updates about your Paysend Account activities). For detailed information on your opt-in and opt-out communication options with us, please see our [Terms of Service](#).

You may withdraw your consent to us processing your personal information at any time by contacting us via any of the methods set out in the next section below.

Questions or concerns

We'll always try to address your questions or concerns in a timely manner, but if this does not happen, we would ask you to please contact us in the first instance so that we can address the issue at once.

If you have questions or concerns in relation to any of the topics set out in this Notice, if you have any questions about how we collect, use and store your personal information or our data protection practices please feel free to contact us in any of the following ways:

By visiting our website: www.paysend.com and tapping the Chat icon on the bottom of each page

By logging into the mobile app: and selecting Chat in the Main Menu

By emailing us at: dataprotection@paysend.com to reach our Data Protection Officer and other team members handling data protection matters

By phone at: 1-844-938-8840 (Toll-Free within the USA) available Mon-Fri: 8 am - 10 pm (MT) and weekends 10 am - 8 pm (MT)

By mailing us at: PAYSEND, 801 Brickell Avenue, 8th Floor, Miami, FL 33131

When you contact us, you may be asked to provide certain personal information so we can verify your identity.

What further steps can you take if you remain unsatisfied?

We hope that it will never come to this but if we do not resolve your questions or concerns to your satisfaction, you've the right to complain to the Consumer Financial Protection Bureau (CFPB) on <https://www.consumerfinance.gov/>.

OTHER IMPORTANT INFORMATION

For Vermont Residents: We will not share your credit information or information about your creditworthiness, transactions, or experience, other than as permitted by Vermont law, unless you authorize us to make those disclosures.

Children's Privacy: Paysend does not knowingly collect Personal Information from children under the age of 13, and users under the age of 13 should not submit any Personal Information to Paysend. If you learn that your child has provided us with Personal Information without your consent and he/she is under the age of 13, please alert us at the contact information detailed in the "Questions or Concerns" section above. We will take prompt steps to remove the Personal Information from our systems.

FINAL COMMENTS

This Notice and future amendments

This Notice is effective as of July 12, 2024. We may periodically update this Notice and encourage you to check here regularly for the most up-to-date version.

Thank you

Thanks for reading this Notice and thank you very much for being a Paysend customer.