

PAYSEND PRIVACY NOTICE

Protecting your personal information is of paramount importance to us. We want to ensure that you, our customer, understand what we do with your personal information once you have provided it to us, and why we handle it in that way. We also want to address the rights you have under applicable law and let you know how you can exercise those rights. Let's get down to it, and if you have any questions, concerns, do get in touch with us.

LET'S INTRODUCE OURSELVES

Who are we?

We're a group of companies known as **Paysend**, and the company with whom you contract when you become our customer is the company responsible for looking after the personal information that you provide to us. That company is referred to under data protection laws as the "**Data Controller**". You can find out more about each Data Controller in the 'Data Controllers' section further down.

As a money transfer and payment services provider, we offer a variety of payments solutions through our platform, which you can access through our website (paysend.com), and our Mobile App. We are licensed and regulated by the Financial Conduct Authority (for services provided by our UK entity), and by the Central Bank of Ireland (for services provided by our Irish entity). Our licences and registrations enable us to provide our services to customers like you, while giving you assurances that we operate with utmost integrity. We're also registered with the data protection regulators of the UK (the Information Commissioner's Office (**ICO**)), and Ireland (the Data Protection Commission (**DPC**)). We have to adhere to many rules and regulations, to ensure that your rights are protected, and that we're doing the right thing by you. Our 'Data Controllers' section further down contains more information about our licences and registrations.

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 (which, in legal language, is called '**personal data**'), as they'll be primarily responsible for the safeguarding of your personal information (although this responsibility passes down to us through the business contracts we have with our business clients).

COLLECTION OF YOUR PERSONAL INFORMATION

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 maximising 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
- To improve, personalise 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, customise, and enhance our services, including the design, content, and functionality of the mobile application and Website
- To improve our customer services, track and analyse 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
- 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 is part of our onboarding process) or during your account verification process (when you call us or make a transaction request for instance).

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 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



A bit of legal in case you're interested

Under applicable law (ie: the UK General Data Protection Regulation 2021 (“**UK GDPR**” for short), the EU’s General Data Protection Regulation (“**GDPR**” for Short), the Irish Data Protection Acts 1988 and 2003, and the Data Protection Act 2018 (“**DPAs**” for short)), together with all other applicable legislation relating to privacy or data protection), we must be able to justify why we’re allowed to process your personal information, and we must inform you about the lawful bases (ie: the reasons allowed under the legislation for us to be able to process your personal information). Accordingly, we rely on the following lawful bases for processing your information:

- **Your consent.** We may process your personal information with your consent, and you’re able to remove your consent at any time by contacting us on: dataprotection@paysend.com
- **A legal obligation.** Where we have a legal obligation to keep your personal information to comply with applicable law or regulation. For example, if we’re asked to keep your personal information, we’ll have to do so, otherwise we would be in breach of the law
- **A contractual obligation.** As mentioned earlier, sometimes we may have contracts with a service provider who provides you with services and requires us to process your personal information on their

behalf. We must also comply with our legal contract with you under our Terms of Service including complying with your wishes in relation to your rights

- **We have a legitimate interest.** Where we have a legitimate business interest in processing your personal information, we'll not seek your consent, but only to the extent that it does not affect your interests and fundamental rights and freedoms. Legitimate interests include our fulfilment of contracts with our clients, our fulfilment of the services that you may ask us to undertake for you, for public interest purposes including detection and prevention of money laundering and terrorist financing, investigations or to defend against legal claims against us

SHARING OF YOUR PERSONAL INFORMATION

Who do we share your personal information with?

We may share your personal information with third party organisations that help us to provide our services to you. Any organisation that receives or has access to your personal information is required to protect it, and may use it only to carry out the services they are performing for you or for Paysend, unless otherwise required or permitted by law.

We may share your personal information with:

- Our suppliers or subcontractors as reasonably necessary for providing our services to you. For a list of our subcontractors, please contact dataprotection@paysend.com
- 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
- 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
- Our group companies, including our affiliates, for rendering our services, compliance with applicable laws and improving the quality of our services
- Our business partners that run advertising campaigns, contests, special offers, or other events or activities in connection with our services
- 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

Let's talk about transfers of your personal information outside of the European Union (EU) and European Economic Area (EEA). Why does that even happen?

As Paysend is an international organisation, we may process, transfer and store your personal information outside the EU/EEA. The EEA includes all the countries in the European Union plus Iceland, Norway and Liechtenstein. Where your personal information is transferred to external parties, we'll always take

reasonable steps to ensure that third party data privacy policies meet EU legislation and we have approved contractual provisions in place with those external parties to ensure as far as we can that your personal information is protected.

Our main subcontractor for the services, **Paysend Group Limited**, is a UK company incorporated in Scotland. We'll transfer your information to that subcontractor solely for the purposes of providing our services to you and only on a "as need to know" basis. Each transfer will be protected by appropriate safeguards of the relevant legally binding obligations of that external party to protect and handle your personal information in accordance with this Notice, and the pertinent data protection laws we adhere to.

The hosting facilities for our website are situated in the EEA. UK and EU laws provide strict requirements and strong protection of confidentiality of your personal information at the level no less beneficial for you than the level provided by the UK GDPR and GDPR. In addition, each transfer is protected by appropriate safeguards of the relevant legally binding obligations of the hosting facilities' entity to protect and handle your information in accordance with this Notice, and the UK GDPR and GDPR.

You should also be aware that certain third-party service providers, such as payment gateways and other payment transaction processors, may be located or have facilities that are located outside the UK/EEA. Therefore, when you request a transaction via your Paysend Account (be it through our Website or - mobile application) it is possible that we may obtain the assistance of a third party provider outside the UK/EEA, and in this case your personal information may become subject to the laws of the jurisdiction(s) in which that service provider's facilities are located. For example, if you're located in the UK/EEA and your transaction is processed by a payment gateway located in Canada, your personal information used to complete that transaction may be subject to disclosure under Canadian law.

Rest assured, we'll only transfer your personal information to countries with adequate data protection laws that have similar safeguarding provisions as those of the UK GDPR and GDPR, or in the alternative, we safeguard your data through contracts binding third party service providers outside the UK/EEA to the same or similar strict data protection safeguarding provisions as those we adhere to.

What about third-party advertising and analytics? How does this apply to you?

We may allow 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 behalf to analyse 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.

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 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 promotional messages from us 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 non-promotional communications such as service messages, including digital receipts and updates about your Paysend Account activities.

PROTECTION OF YOUR PERSONAL INFORMATION

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), to protect your information from loss, theft, misuse, and unauthorised 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 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 purposes, to establish or defend against legal claims, and to protect your vital interests or the vital interests of another person.

YOUR RIGHTS

It's your personal information and therefore you're in control of what happens to it. Remember, under applicable laws, you have a number of rights (which we list below in bold), and to exercise them you only need to ask us to deal with your request (which we must do within 30 days). Here are your rights and how we handle your request(s):

- **Right to information:** You may ask us for details of the personal information we hold about you. You can request details of the purpose of the processing of your personal information, details of the types of personal information we hold about you, and details of precisely whom we have shared your information with. If we receive a request from you to provide you with this information, we'll do so to the extent permitted by law.
- **Right of access:** You may ask us for access to your personal information. If we receive a request from you for such access, we'll provide you with the same to the extent permitted by law.
- **Right to rectification:** You may ask us to rectify any inaccurate or incomplete personal information we may hold about you. If we receive a rectification request from you, we'll update our records so that they reflect the new personal information you provide to us.
- **Right to erasure:** You may ask us to delete your personal information, or to restrict or object to how your personal information is being used. Due to our operational systems and the manner in which we store your personal information, the way in which we observe your right to erasure is not to erase it but instead to anonymise it. This means that your personal information will not be identifiable as belonging to you or in any way link back to you, and it will not be accessible to anybody in our business save as to designated members of our information security team who are under strict confidentiality obligations.

We also make the personal information redundant so that it cannot be revived. We want to reassure you that this mechanism means that effectively your personal information is as good as deleted. There may be instances where we're not allowed to anonymise your personal information, and we must keep it in a 'live' state. These instances include the preservation of records for the purposes of internal and external fraud investigations, to observe laws that we must adhere to requiring us to preserve your personal information for purposes of safeguarding financial records, anti-money laundering and anti-bribery and corruption, to establish or defend against legal claims, and to meet our contractual obligations with our clients (in cases where they provide you their services). If we receive an erasure request from you, we'll action your wishes as described above.

- **Right to restriction of processing:** You have the right to ask us to restrict the processing of your personal information (for instance, to process your information only to provide our services to you and nothing else such as marketing activities). If we receive a restriction request from you, we'll restrict the processing of your personal information to determined categories agreed by you.
- **Right to data portability:** You have the right to receive your information in a structured machine-readable format (for instance in a pdf or excel document) (data portability in tech terms), which will

enable you to for instance migrate your personal information elsewhere. If we receive a data portability request from you, we'll send you all the personal information that we hold on you.

- **Right to object:** You may object to us processing your personal information in certain circumstances. This includes your right to object to us processing your personal information for direct marketing purposes. If you let us know that you object to us processing your personal information, we'll action your request insofar as we're able to do so. To provide our core services to you, we may be unable to observe your request due to the way our systems operate, but where this is the case, you can exercise any of your other rights as you consider appropriate.
- **Right to avoid automated decision-making including profiling:** You may request for your personal information to not be subject to automated decision-making (that is, processed without any human involvement), or for your personal information not to be subject to profiling (for instance, automated processing to digitally deduce your online choices and preferences) where such activity has significantly affects you. If we receive a request from you asking for your personal information to not be subject to profiling for example, we'll adhere to this by ensuring that you're removed from lists where such profiling occurs.
- **Right to withdraw consent:** We'll only process your personal information where we have been given permission by you (by virtue of you directly registering with us for a Paysend Account enabling you to make use of our services) or by consent of our business clients that provide services to you. You have the right to withdraw consent at any time. If we receive a communication from you withdrawing your consent, we'll cease the processing of your personal information. The exception to this is in instances where we're obliged to keep your information to comply with a legal obligation, or to establish or defend against legal claims.

How can you contact us to exercise a rights request?

You may exercise any of the rights listed above by sending an email to us at the following email address: dataprotection@paysend.com (our preferred and fastest way for you to make a request). Alternatively, you may use the technical tools and features of your Paysend Account which will connect you with our customer services team (through our chat function).

QUESTIONS OR CONCERNS

What if something goes wrong and you're unhappy?

We'll always try to address your concerns or queries in a timely manner (within 30 days in any case as we're legally obliged to do), 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.

Where 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 email: we have a Data Protection Officer whose responsibility is to ensure the efficient and proper legal handling of your concern, and who is supported by a team handling data protection matters. You can reach our Data Protection Officer by sending an email to dataprotection@paysend.com.

By post:

If you live in the UK or any other territory (except Australia, Canada, the EEA, El Salvador, Guatemala, Honduras, Jamaica and United States), please send your correspondence to: Paysend Plc, 1st Floor, 20 Garrick Street, London WC2E 9BT, United Kingdom.

If you live in the EEA, please send your correspondence to: Paysend EU DAC, 3 Dublin Landings, North Wall Quay, Dublin 1, D01C4E0, Ireland.

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 concern to your satisfaction, you've the right to complain to the data protection regulator. If you live in the UK or any other territory (except Australia, Canada, the EEA, El Salvador, Guatemala, Honduras, Jamaica, and United States), you can complain to the ICO www.ico.org.uk. If you live in the EEA, you can complain to the DPC www.dataprotection.ie.

DATA CONTROLLERS

The company that is responsible for looking after the personal information that you provide to us differs depending on which country you are based in. If you live in the UK or any other territory (except Australia, Canada, the EEA, El Salvador, Guatemala, Honduras, Jamaica, and United States) the Data Controller is Paysend Plc. If you live in the EEA the Data Controller is Paysend EU DAC. The table below provides further details:

Country Region	Data Controller	Licence and Registration Information	Data Protection Authority
UK or any other territory (except Australia, Canada, the EEA, El Salvador, Guatemala, Honduras, Jamaica, and the United States)	Paysend Plc 1 st Floor, 20 Garrick Street, London WC2E 9BT, United Kingdom	A public company authorised and regulated by the Financial Conduct Authority and holds an electronic money licence. <u>Licence Number: 900004</u> Registered with the UK's data protection regulator, the Information Commissioner's Office. <u>Registration Number: ZA837120</u>	Information Commissioner's Office (ICO) www.ico.org.uk
EEA	Paysend EU DAC 3 Dublin Landings, North Wall Quay, Dublin 1, D01C4E0, Ireland	A company authorised and regulated by the Central Bank of Ireland as an Electronic Money Institution under Regulation 9 of the Electronic Money Regulations and holds an electronic money licence. <u>Firm Reference: C443739</u>	Data Protection Commission (DPC) www.dataprotection.ie

FINAL COMMENTS

This Notice and future amendments

This Notice is effective from 28 August 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 your custom.