

Last updated: 05 December 2024

## 1. Introduction

1.1. The Revolut entities listed at Schedule 1 (*Revolut Employers*) ("**Revolut**", "**we**", "**our**" or "**us**") provide this notice to you because you are applying to work with us as an employee, worker or contractor.

1.2. This notice sets out the basis on which we will process your personal data. Please read it carefully to understand our practices regarding your personal data and how we will use it.

## 2. About Us

2.1. Revolut is the controller of the personal data of prospective employees, workers and contractors, and is subject to applicable data protection laws.

2.2. If you have any questions about this notice or your personal data, or wish to exercise any of your rights as described in this notice or under applicable data protection laws, you can contact Revolut's Data Protection Officer through [dpo@revolut.com](mailto:dpo@revolut.com).

## 3. What types of personal data are protected?

### **Personal data**

3.1. This notice applies to your "personal data". This is any information relating to you as an identified or identifiable person.

### **'Special categories of personal data' (United Kingdom (UK) and European Economic Area (EEA) countries) or 'sensitive personal data' in other countries**

3.2. Within the broad range of information which can be personal data, information revealing the following characteristics are considered "special categories of personal data" in the UK and EEA and are therefore subject to a greater degree of protection:

- physical or mental health;
- racial or ethnic origin;

- political opinions;
- trade union membership;
- religious or philosophical beliefs;
- sexuality or sexual life; and
- genetic and biometric data.

3.3. Outside of the UK and EEA, other types of sensitive personal data, in addition to the "special categories of data" mentioned above, may include:

- social status;
- criminal history;
- membership of a professional or trade association;
- social security numbers;
- bank account information; and
- financial data.

## 4. What personal data we collect

### **Personal data you give us**

4.1. You may give us personal data about you by filling in forms online, corresponding with us by phone, email, in person, or otherwise, or through a recruitment agency or other third party.

### **Personal data we collect from you**

4.2. The personal data that we collect about you includes, but is not limited to, the following:

- your name;
- home address;
- contact details (such as telephone number and email address);
- date of birth;
- gender;
- marital status;
- your image or a recording of you;

- copies of your passport, driving licence and similar documents;
- education history (including copies of relevant degrees, diplomas or certificates if required), training and professional experience;
- current and past employment details;
- immigration status and work permits;
- languages spoken and level of proficiency;
- test results and scores (including the results of any aptitude or psychometric tests we ask you to undergo);
- criminal record information (where required or permitted by local laws);
- information required to prepare the employment contract;
- other information given in your CV;
- interview notes and recordings;
- diversity information (such as information about your race or ethnicity); and
- information about your health, such as any disability you might have.

## 5. Personal data provided by third parties

5.1. We collect most of the personal data described in Section 4 from you directly.

5.2. However, we may also collect personal data about you from third parties, including:

- existing Revolut employees who refer or nominate you for roles with us;
- governmental authorities (such as local tax authorities);
- your named referees who you've asked to provide us with references;
- any third party e-recruitment testing partners we work with;
- where allowed by law, third-party background screening providers, credit reference agencies, fraud prevention agencies, sanction screening and criminal convictions screening agencies; and
- where allowed by law, other publicly available sources, such as social media networking sites (such as LinkedIn, Instagram and Twitter).

## 6. Data relating to criminal convictions and offences

6.1. Where required and allowed by law, we also collect and store personal data relating to criminal convictions and offences. In cases where we need to identify a lawful basis for such processing, then, depending on local laws, such processing is carried out with your consent, to comply with our legal obligations or on the basis of our legitimate interests (to ensure we hire suitable candidates). This data is only processed where it is necessary for the purposes of:

- complying with or assisting other persons to comply with a regulatory requirement which involves Revolut taking steps to establish whether you have committed an unlawful act or been involved in dishonesty, malpractice or other seriously improper conduct;
- preventing or detecting unlawful acts (including fraud);
- any legal proceedings (including prospective legal proceedings);
- obtaining legal advice; or
- establishing, exercising or defending legal rights.

## 7. What we do with your personal data and our legal basis

7.1. We process your personal data for the reasons listed below. In some countries we require a lawful basis to process your personal data and therefore we have also identified this below.

<b>Purpose of processing</b>	<b>Lawful basis</b>
Assessing your skills, qualifications, and suitability for the role, including taking up references and conducting appropriate background checks.	Legitimate interests (to ensure we hire suitable candidates) Performance of a contract
Recruitment processes (including negotiation and communicating with you in relation to your application).	Legitimate interests (to run a fair and efficient recruitment process).
Complying with our legal and regulatory obligations, including for the purposes of: <ul style="list-style-type: none"> <li>• preventing illegal working;</li> <li>• complying with health and safety obligations;</li> </ul>	Compliance with legal obligations.

Purpose of processing	Lawful basis
<ul style="list-style-type: none"> <li>• responding to government statistical monitoring;</li> <li>• assessing fitness and propriety of individuals for the purpose of relevant regulatory schemes to which we must adhere;</li> <li>• considering whether adjustments may need to be made to accommodate an individual with a disability;</li> <li>• liaising with relevant tax authorities and other government entities or agencies in relation to attachments of earnings and similar deductions; and</li> <li>• communications with public or regulatory bodies.</li> </ul>	
Recording interviews for quality control purposes and to train our interviewers.	Depending on local laws, either legitimate interests (to monitor the quality of our interviewers) or your consent.
Carrying out equal opportunities monitoring.	Consent.
Carrying out analytics in relation to Revolut's recruitment practices.	Legitimate interests (to ensure we can improve our recruitment practices where necessary).
Dealing with any legal disputes involving you or other prospective, current or former employees, workers or contractors.	Legitimate interests (to establish, exercise or defend ourselves against legal claims) or, for data subjects in Brazil, regular exercise of rights.
Quality assurance, monitoring and staff training purposes.	Legitimate interests (to ensure our recruitment practices are carried out properly).

Purpose of processing	Lawful basis
Promote the safety and security of our personnel (including by detecting and stopping threats to our personnel and property).	Legitimate interests (to ensure the wellbeing and safety of our staff).
Keeping your application data on file so that we can consider you for future roles and opportunities at Revolut which we think you'd be suited to.	Depending on local laws, either legitimate interests (to ensure our recruitment process is as efficient as possible) or your consent.
Depending on where you are located, we may take steps to verify your identity during the recruitment process to detect and prevent interview fraud.	Depending on local laws, either legitimate interests (to prevent fraud) or your consent.

### **'Special categories of personal data' or 'sensitive personal data'**

7.2. We process 'special categories of personal data' or 'sensitive personal data' for the purposes of:

- carrying out the obligations we have to exercise both Revolut's and your specific rights which are imposed by employment laws;
- establishing, bringing or defending legal claims; and
- in the case of personal data about your physical or mental health, to enable Revolut to assess your working capacity and take decisions for occupational health purposes.

7.3. In the case of "equal opportunities monitoring", please note that participation is voluntary and providing this information is optional. Any information you provide will not be accessible or used in the hiring process, and has no effect on your opportunity for employment.

## **8. Disclosure of your personal data to third parties**

8.1. For the purposes set out in Section 7 above, we may share your personal data with:

- our group companies where necessary to process your application;

- professional advisors (including lawyers, accountants and auditors) where necessary to receive their services;
- legal and regulatory authorities (such as tax authorities) where necessary to comply with our legal obligations;
- our third party service providers, including our data hosting service provider, background screening check provider, fraud prevention agencies and online recruitment testing service providers.

8.2. We also disclose your personal data to third parties where it is in our legitimate interest to do so, including for the following reasons:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if all or substantially all of our assets are acquired by a third party, in which case personal data held about our applicants will be one of the transferred assets; and
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation.

8.3. For UK candidates only, the personal data we have collected from you will be shared with Cifas who will use it to prevent fraud, other unlawful or dishonest conduct, malpractice, and other seriously improper conduct. If any of these are detected you could be refused certain services or employment. Your personal data will also be used to verify your identity. Further details of how your information will be used by us and Cifas, and your data protection rights, can be found by <https://www.cifas.org.uk/fpn>.

8.4. Except as set out in this notice, or as required by law, we do not sell your personal data or disclose it to any third parties without your consent.

## 9. Security of your personal data

9.1. We are committed to ensuring that your personal data is safe and take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this notice.

9.2. Unfortunately, the transmission of personal data through the internet is not completely secure. Although we will do our best to protect your personal data, we

cannot guarantee the security of your personal data transmitted to or stored on our IT system, and any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

9.3. If we share your personal data with any third party, we will take all necessary steps to make sure that your personal data is handled lawfully and securely by that third party.

## 10. How long we keep your personal data

10.1. We will keep your personal data for as long as necessary to fulfil the purposes described in this notice or the terms of any contract that we enter into, or for such longer period as may be required by law. After this, where allowed by laws and this notice, we will erase or anonymise your personal data. If you need any additional information about this, please contact our Data Protection Officer at [dpo@revolut.com](mailto:dpo@revolut.com).

## 11. Automated decision-making

11.1. We may use automated decision-making in the form of online assessments to help streamline our recruitment processes. These online assessments are mainly designed to assess your competency for the role you have applied for, your working style and / or whether or not you would be suitable for a role with Revolut. These online assessments will produce a score based on the responses you provide, which we then use to determine whether or not to progress your application.

11.2. If you are not happy with the outcome of any automated decision we have made, you have the right to challenge this. See the "Exercising Your Rights" section below for more information about how you can do this.

## 12. Your rights

12.1. Subject to applicable laws in your location, you may have certain rights in relation to your personal data, including the right to:

- access a copy of the personal data which we hold about you;



- ask us to correct your personal data if you think it's wrong;
- ask us to delete your personal data in certain circumstances;
- object to us processing your personal data on the basis of our legitimate interests or another lawful basis in certain circumstances;
- ask us to restrict how we use your personal data in certain circumstances;
- ask us to transfer personal data to you or another company in a structured, commonly used, machine-readable format in certain circumstances;
- withdraw your consent (where you have previously given us this); and
- ask us to carry out a human review of an automated decision we make about you.

12.2. Please note that not all of these rights are absolute and we may not be required to comply with your request where exemptions apply under applicable data protection laws.

## 13. Exercising your rights

13.1. You can exercise any of your rights as described in this notice and under data protection laws by contacting Revolut's Data Protection Officer through [dpo@revolut.com](mailto:dpo@revolut.com).

13.2. Where we have reasonable doubts concerning the identity of the person making the request, we may request additional information necessary to confirm your identity.

13.3. We will endeavour to respond to your request within the time period mandated by applicable law. In the UK and the EEA, this means that we will endeavour to respond to your request within one month. Please note, however, that this time period may be extended by a further two months in some cases.

## 14. International transfers

14.1. Your personal data will be stored on servers located in the United States, UK or EEA.

14.2. Where required by applicable laws, your consent to the transfer of your personal data outside your home country will be obtained as part of your application.

14.3. As an international organisation, authorised personnel may access your personal data in any country in which we operate (see Schedule 1). Therefore, it may be necessary to transfer your details to members of our group located in countries that may not have equivalent data protection or privacy laws to those which apply in your own country. We may also need to transfer your personal data to third party service providers located in other countries.

14.4. Regardless of where your personal data is transferred, we shall put in place appropriate safeguards to ensure that your personal data is treated securely and in accordance with applicable law. For individuals in the EEA and UK, this usually means entering into Standard Contractual Clauses with the recipients of your data who are located in countries which are not recognised as having adequate data protection laws. More details regarding these safeguards can be obtained from the Data Protection Officer whose details are given above.

## 15. Complaints

15.1. Please direct any complaints about how Revolut processes your personal data to our Data Protection Officer.

15.2. You also have the right to complain to your local data protection authority:

- a list of European Union data protection authorities can be found [here](#);
- the United Kingdom's data protection authority's contact details can be found [here](#);  
and
- the Brazilian data protection authority's contact details can be found [here](#).
- the Mexican data protection authority's contact details can be found [here](#).

## 16. Changes

16.1. This notice may be amended by Revolut at any time. You can always find the latest version of this notice on our website.

## **Schedule 1**

## Revolut Employers

Location	Revolut entity	Registration details
<b><i>Europe, Middle East and Africa (EMEA)</i></b>		
United Kingdom	Revolut Ltd (also as a foreign employer in Belgium, Bulgaria, France, Italy, Romania, Spain, Sweden and Ukraine (for contractors only))	08804411
	Revolut Newco UK Ltd	12871051
	Revolut Trading Ltd	11567840
	Revolut Travel Ltd	10618740
Lithuania	Revolut Bank UAB (also as a foreign employer in Germany, France, Ireland, Netherlands, Poland, Latvia and United Kingdom)	304580906
	Revolut Ltd filialas	305229066
	Revolut Securities Europe UAB	305799582
	Revolut Insurance Europe UAB	305910164
	Revolut Holdings Europe UAB	305820090
Poland	Revolut Ltd (Branch) (Sp z o.o.) Oddział w Polsce	0000626014
	Revolut Bank UAB (Sp z o.o.) Oddział w Polsce (Polish Branch)	0000879751
Ireland	Revolut Securities Europe Limited	669293

Location	Revolut entity	Registration details
	Revolut Holdings Europe Limited	678388
	Revolut Ltd (Branch)	909724
	Revolut Bank UAB (Branch)	909790
France	Revolut Bank UAB (Branch) Succersale Revolut France	894 031 244
	Revolut Ltd succursale de France (French Branch)	832 601 074
Italy	Revolut Italia, Branch di Revolut Bank UAB	12372510961
Luxembourg	Revolut Technologies S.A.	B235100
Hungary	Revolut Bank UAB (Branch) Magyarországi Fióktelepe	01-17-001372
Portugal	Revolut Ltd (Branch) Sucursal em Portugal	980646855
	Revolut Bank UAB (Branch) Sucursal em Portugal	980752019
Romania	Revolut Ltd Londra Sucursala Bucuresti	J40/6093/2022
Germany	Revolut Ltd (Branch) Zweigniederlassung Deutschland	93264485 (Betriebsnummer / Employer Number), HRB 211556 B (Handelsregister / Commercial Register)
Netherlands	Revolut Bank UAB (Netherlands Branch)	Chamber of Commerce No. 87231832;

Location	Revolut entity	Registration details
		Establishment No. 000053153170
Belgium	Revolut Bank UAB (Belgian Branch)	Numero BCE/ KBO nummer: 0784.549.658
Cyprus	RT Digital Securities Cyprus Ltd	HE 430310 / LEI: 549300ET4IUR6RCZOL8 4
Spain	Revolut Bank UAB Sucursal En España	Registration Number: W0250845E
Ukraine	Revolut Technologies Ukraine LLC	44441834
<b>Asia-Pacific</b>		
Australia	Revolut Payments Australia Pty Ltd	634 823 180
	Revolut Payments New Zealand Pty Ltd (also as a foreign employer in New Zealand)	645 171 651
Japan	Revolut Technologies Japan, Inc.	0100-01-188396
	Revolut Securities Japan, Inc.	10110-01-128976
Singapore	Revolut Technologies Singapore Pte. Ltd.	201721013G
	Revolut Securities Singapore Pte. Ltd.	202102782K
India	Revolut Payments India Private Limited	CIN: U74999MH2021FTC3589 65, Registration Number: 358965
	Revolut Operations India Private Limited	U74999MH2022FTC3794 21

Location	Revolut entity	Registration details
	Arvog Forex Private Limited	CIN: U05999MH1996PTC098004, Registration Number: 098004
<b>Americas</b>		
USA	Revolut Technologies Inc.	6451254, EIN: 37-1863742
	Revolut Securities Inc.	7419207; EIN: 84-1973433
Brazil	Revolut Tecnologia do Brasil Ltda.	44.626.880/0001-81
Mexico	Revolut de Mexico S.A de C.V. (Contacto: <a href="mailto:datospersonales@revolut.com">datospersonales@revolut.com</a> )	N-2022002319
	Revolut Servicios a la Tecnología (Contacto: <a href="mailto:datospersonales@revolut.com">datospersonales@revolut.com</a> )	N-2022077662