

PRIVACY NOTICE

Revolut Bank, S.A., Institución de Banca Múltiple ("**Revolut**", "**Responsible**" and/or "**We**"), with address at Calle Varsovia 36 piso 6, colonia Juárez, alcaldía Cuauhtémoc, Mexico City, C.P. 06600, is the entity responsible for collecting, processing and protecting the Personal Data that you provide to us during the registration process and throughout your relationship with Us.

This Privacy Notice applies to users who have completed the incorporation process and have created an account with Revolut ("**Clients**") and to people who have initiated the process of contracting a product offered by Revolut but have not completed their registration ("**Prospects**"). For this reason, we share with you our Privacy Notice, in which we explain how we safeguard the integrity, privacy and protection of your Personal Data, in accordance with the Law, the Regulations and other applicable provisions. This Privacy Notice is available to you at all times on our website and on the Revolut App.

We inform you that we protect your personal data through security controls, which allow the assurance of both physical and electronic information and its continuous review. For this reason, we share with you our privacy policy and how we safeguard the integrity, privacy and protection of your personal data, in compliance with the Federal Law on Protection of Personal Data Held by Private Parties and its Regulations (the "**Law**"). You, as the owner of personal data, have at your disposal, at all times, this comprehensive privacy notice (the "**Privacy Notice**") on our website www.bineo.com and you can access the contents of the Law on the portal that the Federal Government, through the Ministry of the Interior, makes available at www.ordenjuridico.gob.mx.

1. Definitions

Revolut App or App: It is the mobile application that Revolut makes available to you for both iOS and Android devices.

Privacy Notice: The present document, generated by Revolut that is made available to the Data Subject, prior to the processing of his or her Personal Data.

Consent: Manifestation of the Data Subject's will by means of which the processing of the data is carried out.

Personal Data: Any information concerning an identified or identifiable natural person.

Sensitive personal data: Those personal data that affect the most intimate sphere of its owner, or whose improper use may give rise to discrimination or entail a serious risk for the

owner. In particular, are considered sensitive those that may reveal aspects such as racial or ethnic origin, present and future health status, genetic information, religious, philosophical and moral beliefs, union membership, political opinions, sexual preference.

ARCO Rights: These are the rights of access, rectification, cancellation and opposition.

Processor: The natural or legal person who alone or jointly with others processes personal data on behalf of the data controller.

Law: Federal Law for the Protection of Personal Data in Possession of Individuals.

KYC: *Know your Customer* or fulfillment of obligations.

Regulation: The Regulation of the Federal Law for the Protection of Personal Data in Possession of Individuals.

Responsible: Individual or legal entity of a private nature that decides on the processing of personal data.

Revolut: Revolut Bank, S.A., Institución de Banca Múltiple.

Data Subject: The natural person to whom the personal data corresponds.

Processing: The collection, use, disclosure or storage of personal data, by any means. Use includes any action of access, handling, exploitation, transfer or disposition of personal data.

Transfer: Any communication of data to a person other than the person responsible for or in charge of the processing.

2. Information Principle

The Responsible informs you that it has, collects or will collect from you, the personal data necessary for the proper contracting of products, performance of operations and provision of services, as well as for the celebration of other acts that the Responsible may perform in accordance with the Law and its bylaws. Such personal data may have been or may be obtained from you personally or by any electronic, optical, sonorous, visual or other technological means. We may also obtain personal data about you from third parties and other sources permitted by law, such as credit information companies.

The data will be collected from the documents that you provide, as well as from those stated in the service request(s) that you submit to the Responsible, as well as from the complementary services that are used to provide the required service, formalize the contracting and maintenance of the commercial relationship that is originated.

3. Consent

In accordance with the Law, we require your express consent to this Privacy Notice to collect and

process your personal, financial and other information that we may collect in accordance with our relationship with you. You may give your consent by clicking "accept and continue" following this Privacy Notice.

Specific Revolut products and services that you use may have separate privacy notices. These notices:

- Will provide you with more details about how Revolut collects, uses and protects your Personal Data when you use specific Revolut products or services.
- Will be provided to you through the Revolut App when you start using relevant Revolut products or services.
- Can be accessed at any time through the Revolut website.

On occasion, we may also provide "just-in-time" privacy explanations on the Revolut App when you use a new Revolut product or service for the first time:

- These explanations will help you understand what specific personal data Revolut collects, uses or shares about you for that product or service.
- Where relevant, you will be asked to review your privacy preferences in the Revolut App.

We may provide privacy notices in languages other than English. If there are discrepancies between the other language versions and the English version, the English version will prevail.

If you have concerns about how we use your personal data, you can contact

dpo@revolut.com **4. Personal Data collected by Revolut**

4.1. In order to fulfill the purposes set forth in this Privacy Notice, Revolut may collect the following **categories of Personal Data**:

- Identification Data
- Contact Data
- Location Data
- Geolocation Data
- Biometric Data
- Employment Data
- Academic and/or professional data
- Wealth and/or financial data
- Migratory data
- Sensitive personal data
- Information about your preferences or tastes for goods or services contracted with Revolut and/or third parties.
- Transactional profile data

In relation to the above categories, some examples of the Personal Data to be collected may include,

but are not limited to:

- Your name, address and date of birth.
- Your email address, phone number and details of the device you use (e.g., your phone, computer or tablet).
- Your Revolut username, known as "Revtag" (this is random and is automatically assigned to you when you first join, but you will be able to change it).
- Your registration information.
- Your bank account details.
- Details of your Revolut debit and credit cards (or other debit or credit cards you have registered with us), including the card number, expiration date and CVC (the last three digits of the number on the back of the card).
- Copies of your identification documents (e.g., your INE and passport) and any other information you provide to prove that you are eligible to use our services,
- Your country of residence, tax residency information and tax identification number.
- Information you provide when you apply for credit, including details of your or your spouse's income and financial obligations.
- Records of our conversations, if you communicate with us or we communicate with you (including records of telephone calls).
- Your image in photographic or video format (where necessary as part of our "Know Your Customer" ("KYC") checks, to authenticate you as an authorized user of our services or to detect fraud.
- Information about other persons (such as a joint account holder, your spouse or your family) when we ask you to provide this information to enable us to comply with our obligations under KYC, anti-money laundering laws and to assist with fraud monitoring.

4.2. In addition to the Personal Data mentioned in the previous section, Revolut may collect the following **categories of Sensitive Personal Data**:

- Biometric Data
- Health Data
- Ethnic origin data
- Sexual preference
- Sexual identity
- Political opinions
- Religious beliefs

5. Purposes of the processing of your Personal Data

5.1. PRIMARY PURPOSES

To verify your identity

Whenever you register with Revolut, we will use your personal data to verify your identity or the identity of joint account holders (as part of our KYC process). This may include facial scan data extracted from any photo or video you submit (known as "biometric data").

Obtain bank and trade references Provide

you with our services

Each time you apply for or use a Revolut product or service, we will use your personal data to:

- Confirm whether or not you approve your request
- Contact you through the Revolut App or through the contact details you have provided to us.
- Comply with our contractual and legal obligations relating to any products or services you use (for example, to make payments into and out of your Revolut account, withdraw cash or make payments with your Revolut card)
- Help you understand your spending behavior, how you use Revolut products and services and help you save money (for example, by providing you with information about your buying and spending behavior)
- Recover debts and exercise any other rights we have under any agreement with you
- Provide you with customer service. We may record and monitor any communication between you and us, including telephone calls, to maintain appropriate records, verify your instructions, analyze, evaluate and improve our services, and for training and quality control purposes.
- Evaluate and manage requests for portability and/or mobility of financial products that by their nature allow it.

Fraud protection

We use your personal information to verify your identity and address, protect against fraud, comply with financial crime laws, and confirm that you are eligible to use our services. We also use it to better understand your financial situation and manage fraud risks related to your Revolut account. **To comply with our legal obligations, enforce our rights, protect our business and other lawful uses.**

We use your personal information:

- To comply with requests from administrative or judicial authorities (e.g., government authorities, law enforcement authorities, tax authorities, fraud prevention agencies).
- To perform collection operations (for example, when you maintain a credit product with us or have a negative balance on your account).
- To comply with our legal or regulatory obligations.
- To identify and support vulnerable customers by analyzing their behavior on the Revolut App, customer service communications and through transactions (for example, we will try to identify whether you are potentially vulnerable so that we can better support you (identifying and supporting vulnerable customers is a legal requirement for us in some countries)).
- To protect us, including our rights, property, personnel or products.
- To help prevent and combat harmful or unlawful conduct and spam communications.
- In connection with legal claims.
- To help detect or prevent crime.

- To integrate and maintain your customer or prospect file in our databases. •
- To issue vouchers, including those of a fiscal nature.
- To perform internal and external auditing processes

Maintain our services in operation

We use your personal data to administer our website and the Revolut App (including for troubleshooting, data analysis, testing, research, statistics and survey purposes) and to ensure that content is presented in the most effective manner for you and your device.

We also use your personal data to:

- Manage your access to mobile banking and/or any other channels Revolut makes available to you from time to time.
- Authenticate you as an authorized user of our services when necessary (for example, if you communicate with our customer service or social media teams).
- Allow you to participate in interactive features of our services.
- Inform you about changes to our services.
- Keep our website and the Revolut App secure.

Provide location-based services.

If you activate location-based services on the Revolut App, we will use your personal data to provide products and services to you and protect you against fraud and identity theft.

5.2. SECONDARY PURPOSES

Marketing and provision of products and services that may be of interest to you. We use your personal data to do the following:

- To personalize your experience on the Revolut App, Revolut products, and marketing messages about our products and services to make them more relevant and interesting to you (where permitted by law). This may include analyzing how you use our products, services and your transactions.
- Providing you with information about promotions or offers from our partners that we believe may be of interest to you.
- Referring products and/or services from third parties with whom Revolut has entered into contracts and which may be offered to you.
- To measure or understand the effectiveness of our marketing and advertising, and to provide you with relevant advertising.
- To ask for your opinion about our products or services.

Remember, you can ask us to stop sending you marketing information by adjusting your marketing choices.

To facilitate the use of Revolut products or services in a social way.

We use your personal data to improve and facilitate social interactions through our services, or to

add additional features to provide a better experience. For example, if you give us permission, we will use your phone's contact list so that you can easily make payments or send messages to your contacts through the Revolut App.

Improve our products and services

We use your personal data to help us develop and improve our current products and services. This allows us to continue to offer products and services that our customers want to use. For example, we may include you in a focus group to test and develop new products because we think you will be interested based on how you spend or use other Revolut products.

If you do not want Revolut to process your Personal Data in connection with any of the secondary purposes, you may opt-out by sending an e-mail to dpo@revolut.com. If we do not receive your refusal within 5 business days after the date your data was collected, it will be understood that you have consented to the use of such information.

6. Do you make automated decisions about me?

Depending on the Revolut products or services you use, we may make automated decisions about you.

This means that we may use technology that can evaluate your personal circumstances and other factors to predict risks or outcomes. This is known as profiling. We do this for the efficient operation of our services and to ensure that decisions are fair, consistent and based on the right information.

When we make an automated decision about you, you have the right to request that a person review it manually.

For example, we may make automated decisions about you related to:

Account opening:

- KYC, anti-money laundering and sanctions checks.
- Identity and address checks

Fraud detection:

- Monitoring your account for fraud and financial crime.

7. How do you use my personal data for marketing?

If you register for our services, and where national laws permit, we will assume that you wish us to contact you by automatic notification, email and text message with information about Revolut products, services, offers and promotions. Where national laws require us to obtain your consent to send you marketing messages, we will do so in advance.

We use your personal data to personalize marketing messages about our products and services to make them more relevant and interesting to you (where permitted by law). This may include analyzing how you use our services and your transactions.

You can object to our profiling for direct marketing purposes. You can also adjust your preferences or tell us that you do not want to receive direct marketing from us at any time. Just use the privacy settings in the Revolut App or click the unsubscribe links in any marketing messages we send you.

If you do not wish to receive personalized marketing messages and opt-out, you will not receive any marketing communications. However, you may still receive generic information about our products and services on the Revolut App.

We will not pass your details to any organization outside the Revolut group of companies for marketing purposes without your permission.

8. ARCO Rights

You have the right to exercise your Access, Rectification, Cancellation and Opposition ("**ARCO**") rights. The following are the rights you have:

- **ACCESS:** to know specific information that Revolut has in its possession;
- **RECTIFICATION:** request the rectification of Personal Data in case they are outdated, inaccurate or incomplete, to exercise this right you must submit documentation proving the requested rectification in accordance with the Personal Data;
- **CANCELLATION:** blocking and subsequent deletion of Personal Data from our databases when you consider that it is not being used properly or for the purposes that gave rise to the legal relationship;
- **OPPOSITION:** oppose the use of your Personal Data for specific purposes.

Additionally, you may revoke your consent for the processing of your Personal Data. **9.**

How can I exercise my rights?

To exercise any of your rights set forth in the previous section, you can contact us through the Revolut App customer service chat or send us an email to [.dpo@revolut.com](mailto:dpo@revolut.com)

For security reasons, we cannot deal with your request if we are not sure of your identity, so we may ask you for proof of identity, and that you accompany your request with a copy and/or photograph of any of the following documents:

- Valid official identification: National Electoral Institute credential, passport issued by a competent authority, valid immigration form, or professional license.
- In case the Holder exercises his/her Arco Rights through a legal representative, in addition to the official identification of both, a legible copy of the power of attorney or power of attorney signed before two witnesses in which powers are granted to carry out this procedure is required.

Our response to any request to exercise your ARCO rights ("Request") will be provided by email within 20 (twenty) business days from the date of receipt of the Request in electronic format so that, if it is appropriate, it becomes effective within 15 (fifteen) business days from the date on which the response is communicated. The aforementioned deadlines may be extended once for an equal period of time, if justified by the circumstances of the case.

Generally, Revolut will not charge you a fee when you exercise your rights. However, the law permits us to charge a reasonable fee or to refuse to act on your request if it is manifestly unfounded or excessive.

In case you revoke your authorization for the processing of your Personal Data, under any of the primary purposes mentioned in this privacy notice, Revolut may suspend the services provided in order to comply with the legal provisions in force.

For any doubt or clarification regarding the procedure or means to exercise your Arco Rights, you can send an email to our personal data protection department, at the following email address: dpo@revolut.com

If you are not satisfied with the way we have handled your request, you may file a complaint with the National Institute of Transparency, Access to Information and Protection of Personal Data.

The exercise of any ARCO right is not a prerequisite to, nor does it preclude the exercise of any other right.

If you consider that your right to the protection of your personal data has been violated by any conduct or omission on our part, or presume any violation of the provisions of the Federal Law for the Protection of Personal Data Held by Private Parties, its Regulations and other applicable laws, you may file a complaint with the National Institute for Transparency, Access to Information and Protection of Personal Data (INAI). For more information you can visit its official website www.inegi.org.mx.

10. Transfer of Personal Data **Do you share my personal data with anyone else?**

The natural or legal persons to whom Revolut may transfer your information are the following: *Revolut group companies*.

We share your personal data within the Revolut group of companies in order to:

- Provide you with the best service
- Send you information about Revolut products and services that we think you may be interested in knowing about.

Other Revolut customers

Revolut

We will ask you to allow us to synchronize your cell phone contacts. This will help you identify which of your trusted contacts are Revolut customers. Your "trusted contacts" will also be able to see if you are a Revolut customer through our visibility settings in the Revolut App.

Discoverability within the Revolut App gives you access to Revolut features such as requesting money from friends, splitting bills, bundling pockets, paying other Revolut customers or chatting with your "trusted contacts".

We use technological security measures to ensure that a "trusted contact" is someone you already know and who knows you (for example, if both of you are reflected as saved contacts on your cell phones or if you have already received or sent transfers through accounts at the same bank).

Both you and your trusted contact must have synchronized your cell phone contact lists with Revolut so that you can see each other in the Revolut App.

If you have synced your cell phone contacts, we display basic contact details about you in the Revolut App to your trusted contacts who are also Revolut customers (e.g. your name (as stored in your friend's contact list), cell phone number, Revtag, Revolut username and Revolut profile picture (if you have one)).

Of course, you can choose not to sync your contact list with Revolut. This means that you will not be able to identify which of your cell phone contacts are Revolut customers.

You can also change your visibility preferences through the privacy settings in the Revolut App.

Other Revolut customers will be able to search for you through the Revolut App using your Revtag. When they enter your Revtag, they will be able to see your name and profile picture (if you have one). You can disable the discovery feature via your Revtag through the privacy settings in the Revolut App.

People or companies you transfer money to

When you make a payment from your Revolut account, we will provide the recipient with your details along with the payment. This is because, like all payment institutions, we are required by law to include certain payment-related information.

Persons or companies that transfer money to you

When you receive a payment into your Revolut account, we will provide the payer with your details (e.g. your name and IBAN). This is necessary to confirm that the payment has been made to the correct account.

Vendors

The following table explains which vendors we typically share your personal data with:

- Vendors who provide IT, payment and delivery services to us.
- Our banking and financial services partners and payment networks, including

Visa and Mastercard

- Identity verification and KYC service providers
- Card manufacturing, personalization and delivery companies
- Analytics providers and search information providers
- Customer service providers, survey providers and developers
- Communications service providers
- Collection agencies
- Biometric validation providers

Partners who help provide our services

We may share your personal data with our partners to:

- Provide certain services you have requested from us (for example, when we offer insurance as part of our membership plans).
- Make sure you get any rewards we have promised you (for example, if you make a purchase with a partner, we will share limited information about you to make sure you get the correct refund)

We will only share your personal data in this way if you have requested the relevant service or if it is provided as part of our promotional packages.

From time to time, we may work with other partners to offer you co-branded services or promotional offers, and we will share some of your personal data with those partners. We will always ensure that you understand how we and our partners process your personal data for these purposes.

Credit Reporting Companies

As set out in the [Do you run credit checks on me?](#) section above, if you apply for a credit product, we will share your personal data with Credit Reporting Companies to check your credit profile (likelihood of you making repayments on your credit at maturity).

Other financial institutions and Revolut customers

We may share your personal data with other financial institutions or Revolut customers if you ask us to do so. For example, if you have activated the "Open Banking" feature through an account you have at another financial institution and have given permission, we will share your Revolut account information (such as balance, payment transactions, account number and branch code) with that financial institution.

We may also share your personal information with other financial institutions or Revolut customers if they ask us to do so. For example, if a payment is made to your account in error, we may share your information with the financial institution or Revolut customer from which the payment originated. This will help the payer and the other financial institution attempt to recover the payment themselves.

Other third parties

We may share your personal information with other third parties where necessary to facilitate the receipt of payments to your Revolut account.

For legal reasons

We also share your personal data with other financial institutions, financial services companies, insurance providers, government authorities, law enforcement authorities, tax authorities, fraud prevention companies and agencies to verify your identity, investigate or protect against suspected fraud, comply with tax laws, anti-money laundering laws or any other laws, and confirm that you are eligible to use our products and services.

If fraud is detected, Revolut or other companies may deny you certain services.

We may also need to share your personal data with other organizations or third party authorities:

- If we have to do so under any law or regulation.
- If we sell our business or credit portfolio
- In connection with criminal or fraud investigations
- To enforce our rights (and those of our customers or others)
- In connection with legal claims.

Social media companies and advertising

When we use social media for marketing purposes, your personal data (limited only to your name, email address and Revolut App events) may be shared with social media platforms so that they can check whether you also have a social media account. If you do, we may ask the advertising partner or social media provider to:

- Use your personal data to send you our advertisements, because we think you might be interested in a new Revolut product or service.
- Not send you ads when the marketing relates to a service you already use
- Send our ads to people who have a similar profile to you (for example, if one of our services is particularly useful to people with similar interests to your social media profile, we may ask our advertising partner or social media partner to send our ads for that service to those people)

We may share your personal data with our advertising partners in the ways described above, but the personal data is hashed before we send it, and the advertising partner with whom we share it may only use that hashed personal data in the ways described above.

You can contact us at any time, either through the Revolut App or by sending an email todpo@revolut.com, if you do not want us to share your personal data for advertising purposes. You can also use the privacy settings on the Revolut App to opt out of sharing your personal data in this way.

Authorities

When we access your biometric data for onboarding purposes, we will share that information with the INE for the purposes of validating your identity. INE will check the data received against the Verification System database provided by INE. We may also share information containing your

personal data, when required by authorities and government agencies.

Pursuant to the provisions of the Law and its Regulations, the Controller informs you that the consent of the Data Subject will not be required for the processing of Personal Data when: (i) it is provided for in the regulations in force, (ii) the Personal Data are contained in publicly available sources; (iii) the Personal Data have undergone a prior dissociation procedure, (iv) it has the purpose of fulfilling obligations arising from a legal relationship between the Data Subject and the Controller, (v) there is an emergency situation that could potentially harm an individual in his or her person or property,

(vi) they are indispensable for medical care, prevention, diagnosis, provision of health care, medical treatment or management of health services, as long as the Data Subject is not in a position to grant consent, in the terms established by the General Health Law and other applicable legal provisions and that such data processing is carried out by a person subject to professional secrecy or equivalent obligation, or (vii) a resolution is issued by a competent authority.

Likewise, you are informed that with the acceptance of this Privacy Notice, it is understood that the Data Subject grants his/her authorization for the Controller to transfer his/her Personal Data to third parties, whether Mexican or foreign, without the need to obtain his/her consent again, when the transfer is located in any of the following cases: (i) it is provided for in a law or international treaty to which Mexico is a party; (ii) it is necessary to safeguard the health of the Data Subject, (iii) the transfer is made to subsidiary or affiliated companies under the common control of any of the Controller or to a parent company or to any company of the same group of the Controller that operates under the same internal processes and policies; (iv) is necessary because of a contract entered into or to be entered into in the interest of the Data Subject; (v) is necessary or legally required for the safeguarding of a public interest, or for the procurement or administration of justice; (vi) is necessary for the recognition, exercise or defense of a right in a legal proceeding; and, (vii) is necessary for the maintenance or fulfillment of a legal relationship between the Data Subject and the Controller.

11. Options and means to limit the use or disclosure of your Personal Data

You may limit the use or disclosure of your personal data by sending an email to the following address: dpo@revolut.com. The requirements to prove your identity, as well as the procedure to attend your request will be governed by the same criteria indicated in the ARCO rights section.

In case you wish to limit or suspend the use of your Personal Data for advertising or promotional purposes, you may register in the Public Registry of Users (REUS) of the National Commission for the Protection and Defense of Users of Financial Services (CONDUSEF), through its website: <https://www.condusef.gob.mx>.

12. Will my data go outside of Mexico?

As we are part of an international group, we may need to transfer your personal information outside of Mexico in order to provide you with our services. For example, if you request an international wire transfer, we will send funds to banks outside of Mexico. We may also send your personal information outside of Mexico to comply with global legal and regulatory requirements and to provide ongoing

support services. We will ensure that any transfer of data includes the same level of protection as set forth in this policy. For example, we will ensure that a contract with strict data protection safeguards is in place before transferring your personal data.

If you would like more information, you can contact us by sending an email to dpo@revolut.com

. 13. Use of cookies, web beacons and other tracking technologies.

We use cookies to analyze your use of our website. Please read our Cookie Policy for more information about cookies.

We also use pixels or web beacons in the direct marketing emails we send you. These pixels track whether our email was delivered and opened, and whether links within the email were clicked. They also allow us to collect information such as your IP address, browser, email client type and other similar details. We use this information to measure the performance of our email campaigns and to perform analytics. You can control whether you receive direct marketing emails through the privacy settings in the Revolut App.

14. How long do you keep my personal data?

We will generally retain your personal data for ten years after the end of our business relationship or for the period required by applicable local laws. We are required to retain your personal data during this time by KYC, anti-money laundering, anti-terrorist financing, general banking and other applicable laws. We may retain your personal data for longer due to a potential or ongoing lawsuit or other legal reason.

15. How will I know if this Privacy Notice has changed?

Revolut reserves the right to make changes to this Privacy Notice, in which case, it will be posted on our website and/or the Revolut App.

You can access the content of the Law on the portal that the Federal Government, through the Ministry of the Interior, makes available to you at www.ordenjuridico.gob.mx.

We inform you that the competent authority to resolve any dispute arising from the application of the Federal Law on Protection of Personal Data Held by Private Parties and its Regulations is the National Institute for Access to Information and Personal Data (INAI) and you can learn more about it at www.inai.org.mx.