



## COMPREHENSIVE 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 registration process and have created an account with Revolut ("**You**" or "**Customers**"), as well as people who have initiated the process of contracting a product offered by Revolut but have not completed their registration ("**You**" or "**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: <https://www.revolut.com/> 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 accordance with the Federal Law for the Protection of Personal Data in Possession of Individuals and its Regulations (jointly and indistinctly 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: <https://www.revolut.com/>.

### 1. Definitions

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

**Privacy Notice:** The present document, generated by Revolut that is made available to you, prior to the processing of your Personal Data.

**Consent:** It is your manifestation of your will as the owner of the data by means of which the processing of the same is carried out.

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

**Sensitive personal data:** Personal data that affects the most intimate sphere of its owner, or whose improper use may give rise to discrimination or entail a serious risk to 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.

# Revolut

**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:** For its acronym in English: "*Know your Customer*", being the information and documents necessary to know and identify you to avoid money laundering operations and / or financing of terrorism in compliance with the regulations applicable to Credit Institutions.

**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:

- 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 may contact [datospersonales@revolut.com](mailto:datospersonales@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 information
- Location data
- Authentication Data
- Geolocation data
- Biometric data
- Health data
- Racial and ethnic origin
- Employment data

# Revolut

- Academic and/or professional data
- Property and/or financial data
- Tax data
- Sensitive personal data
- Transactional profile data
- Information about your preferences or tastes for goods or services contracted with Revolut and/or third parties.

For the above, Revolut may collect for the purposes described in this Privacy Notice:

- Your name, nationality, place of birth, and date of birth.
- Unique Population Registry Code ( "CURP"), Federal Taxpayer Registry ("RFC").
- Address
- Your email address, phone number and details of the device you use to access the Revolut application (e.g., your cell phone).
- Your Revolut username, known as "Revtag" (this is random and is automatically assigned when you first join, but you will be able to change it).
- Your bank account details.
- Identification document (your voting card issued by the National Electoral Institute) 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 income and financial obligations or those of your resource provider, if applicable.
- Records of your communications with Revolut.
- Your image in photographic or video format (where required as part of our Know Your Customer ("KYC") checks).
- Information about other persons related to the products contracted with Revolut (such as beneficiaries, joint account holder, spouse, etc). By providing this data you acknowledge that you have the consent of such persons to share their information with Revolut.

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
- Racial or ethnic origin



## **5. Purposes of the treatment of your Personal Data**

The personal data provided will be processed only for the purposes set forth in this Privacy Notice, as applicable, necessary and based on the legitimate interest for the execution of the same, complying at all times with the applicable regulations.

### **5.1. PRIMARY PURPOSES**

#### **To verify your identity**

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

#### **Conducting activities related to the products you contract with Revolut.**

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

- Confirm whether you approve or disapprove of your request
- Contact you through the Revolut App or through the contact details you have provided to us.
- Fulfilling our contractual and legal obligations relating to any products or services you use (e.g. making payments into and out of your Revolut account, withdrawing cash or making payments with your Revolut card, sending notifications).
- Protecting against fraud against you or Revolut, as specified below
- Helping you understand your spending behavior, how you use Revolut products and services and helping you save money (for example, by providing you with information about your shopping and spending behavior)
- Recover debts and exercise other rights we have under any agreement with you.
- Provide customer service to you. We may record and monitor any communication between you and us, to maintain adequate 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.
- To carry out investigations and necessary actions, directly or through third parties hired for this purpose, before agencies, autonomous organizations or federal and local authorities or third parties that have legitimate access to your Personal Data, in order to verify your income and make inquiries about your credit history.
- To integrate and/or update files, databases and necessary systems through your personal data provided directly or obtained from public media, agencies, autonomous agencies or federal and local authorities or third parties who have legitimate access to your information.
- Perform billing activities and process payments through the forms and mechanisms enabled, related to the use of our products and services, as well as those goods and services provided by third parties.
- To administer our website and the Revolut App (including for troubleshooting purposes, data analysis, testing, research, statistics and surveys) and to ensure that content is presented in the most effective manner for you and your device.
- To manage your access to mobile banking and/or any other channels Revolut makes available to you from time to time.
- Manage your Revolut products.

# Revolut

- 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.

## **Fraud protection and crime prevention**

We use your personal information to verify your identity and address, protect you against fraud, protect against identity theft, comply with financial crime laws, and confirm that you are eligible to use our services. We also use them to better understand your financial situation and manage fraud risks related to your Revolut account, as well as to conduct investigations and actions we deem necessary to verify directly, or through third parties, agencies and authorities, the accuracy of the information provided to us and to update it. As well as to help prevent and combat harmful or illegal conduct and spam communications, and to help detect or prevent crimes.

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)).

## **Compliance with Applicable Legal Provisions**

- To comply with requirements of administrative or judicial authorities (e.g., government authorities, law enforcement authorities, tax authorities, fraud prevention agencies).
- To carry out collection activities.
- To comply with our legal or regulatory obligations.
- To integrate and keep your customer or prospect file updated in our databases.
- To issue receipts, including those of a fiscal nature.
- To carry out internal and external auditing processes.

## **5.2. SECONDARY PURPOSES**

### **To market and offer products and services**

- 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. This may include analyzing how you use our products, services and your transactions.
- Providing you with information about promotions or offers.
- 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 advertising, and to provide you with relevant advertising.
- Ask for your opinion about our products or services.

Remember, you can ask us to stop sending you advertising information at any time.

# Revolut

## **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 for any of the secondary purposes previously described, you may request it by sending an email to the address: [datospersonales@revolut.com](mailto:datospersonales@revolut.com), for which Revolut will respond to your request within 20 (twenty) business days from the date of receipt thereof, if such request is granted, it will be effective within 15 (fifteen) business days from the date on which the response is communicated.

## **6. Do you make automated decisions about me?**

We may use technology that can evaluate your credit circumstances to perform credit analysis and/or offer Revolut products and services. We do this for the efficient operation of our services and to ensure that decisions are fair, consistent and based on accurate information.

## **7. How do you use my personal data for advertising purposes?**

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 advertising messages about our products and services to make them more relevant and interesting to you. This may include analyzing how you use our services and your transactions.

You can object to receiving marketing messages and 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 advertising messages we send you. You may continue to receive generic information about our products and services on the Revolut App.

# Revolut

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 rights of Access, Rectification, Cancellation and Opposition ("**ARCO**"). Below we indicate 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 not updated, are inaccurate or incomplete, to exercise this right you must provide 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 ARCO 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 [datospersonales@revolut.com](mailto:datospersonales@revolut.com).

For security reasons, we cannot fulfill 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 the event that the Data Subject 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, provided that the circumstances of the case justify it.

# Revolut

Revolut will not charge you any fees when you exercise your ARCO Rights.

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 cancel the legal relationship and/or suspend the services provided in order to comply with the legal provisions in force.

For any questions 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: [datospersonales@revolut.com](mailto:datospersonales@revolut.com).

If you are not satisfied with the way we have handled your request, you may file a complaint with the Anti-Corruption and Good Governance Secretariat.

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 Anti-Corruption and Good Governance Secretariat and you can learn more about it at <https://www.gob.mx/buengobierno>.

## **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 for:

- When the transfer is necessary for the offering and maintenance of products or services that you have contracted with other entities of the group of companies to which Revolut belongs, such as Revolut LTD.
- Provide you with the best service
- Send you information about Revolut products and services that we think you may be interested in knowing about.

#### *Companies necessary for the maintenance or offering of our Products.*

We may send to companies that Revolut has contracted as suppliers for the offering or maintenance of our products and services, your Personal Data, which will be processed only to verify your Personal Data, or to facilitate and improve the offering of financial products and services.

#### *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.

We use technological security measures to ensure that a "trusted contact" is someone you already know and who knows you (for example, if you are both 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.

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.

## *Government Entities*

When it is necessary to comply with any regulation or authority requirement.

## *Providers*

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

- Vendors who provide us with Information Technology, payment and delivery services.
- Our banking and financial services partners and payment networks, including Visa and Mastercard
- Identity Verification and KYC Service Providers
- Employment verification and/or income verification service providers
- Card manufacturing, personalization and delivery companies
- Analytics providers and fraud search and prevention information providers
- Customer service providers, survey providers and developers
- Communications and telecommunications service providers
- Tax compliance 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

# Revolut

- Provide you with 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 benefit plans.

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.

## *Other financial institutions and Revolut customers*

We may share your data inside or outside of Mexico with companies related to Revolut or the economic group of which Revolut is a part, such as: (i) its controlling companies, affiliates, subsidiaries and/or any company of the same corporate group that operate under the same internal processes and policies, for the purposes they deem necessary, including but not limited to the centralized safekeeping of information, to document and formalize operational and/or corporate restructuring operations, for the development, implementation or sale of new and/or existing products and services, as well as for statistical and historical customer record purposes; (ii) credit reporting companies, to request information about your credit history and contact information; (iii) government authorities, agencies or entities, to perform information verifications, to comply with obligations under applicable law and/or to comply with requirements made by competent authorities, if applicable; (iv) collection companies, to perform judicial or extrajudicial collection of unpaid credits, and (v) unrelated third parties (service providers), for the sole purpose of assisting Revolut in the provision of its services or when you so request.

## *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 information with other financial institutions, financial services companies, insurance providers, government authorities, law enforcement authorities, tax authorities, companies and fraud prevention agencies to verify your identity, investigate or protect against suspected fraud, comply with tax laws, anti-money laundering laws or 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 customers or others)

# Revolut

- In connection with legal claims.

## *Social media companies and advertising*

When we use social media for advertising 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.
- Do not send you ads when the advertising relates to a service you already use.
- Send our ads to people who have a similar profile to yours (for example, if one of our services is particularly useful to people with similar interests to those in 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 to [datospersonales@revolut.com](mailto:datospersonales@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 match the data received with 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 shall 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 person or property,

(vi) 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.

# Revolut

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 judicial proceeding; and, (vii) is necessary for the maintenance or fulfillment of a legal relationship between the Data Subject and the Controller.

## **11. Other means to limit the use or disclosure of your Personal Data**

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 be shared 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 [datospersonales@revolut.com](mailto:datospersonales@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 modifications, updates to this Privacy Notice to adapt them to its current operations or to comply with applicable regulations, in which case, it will be published on our website: <https://www.revolut.com/> and/or on the Revolut App.

You can access the content of the Law in the portal that the Federal Government, through the Ministry of the Interior, makes available to you at [www.ordenjuridico.gob.mx](http://www.ordenjuridico.gob.mx).

We inform you that the competent authority to resolve any conflict arising from the application of the Federal Law on Protection of Personal Data Held by Private Parties and its Regulations is the Anti-Corruption and Good Governance Secretariat and you can learn more about it at <https://www.gob.mx/buengobierno>.

**Last update of the Privacy Notice: September 2025**