

Last updated: 11 August 2023

We're committed to protecting and respecting your privacy.

We will:

- always keep your personal data safe and private
- never sell your personal data
- allow you to manage and review your marketing choices at any time

## 1. About us

Revolut Technologies Singapore Pte. Ltd. ("**Revolut**", "**we**", "**us**" or "**our**") is responsible for handling your personal data when you use the Revolut app.

We are a private limited company incorporated in the Republic of Singapore. Our registered address is 30 Cecil Street #19-08, Prudential Tower, Singapore (049712).

If you have concerns about how we use your personal data, you can contact [dpo@revolut.com](mailto:dpo@revolut.com).

If you are a resident of Singapore, this Privacy Notice will not apply to you. The Singapore [Privacy Policy](#) will apply to the provision of services to residents of Singapore.

## 2. Why do I need to read this notice?

We collect your personal data when you use the Revolut app.

We may also collect your personal data from other people or companies. We explain how this can happen in more detail in the section headed '*What personal data do you collect about me?*' below.

When we say 'personal data', we mean information which:

- we know about you (for example, we know when you use your Revolut app to make a bank transfer)
- can be used to personally identify you (for example, a combination of your name and email address)

This notice explains what information we collect, how we use it, and your rights if you want to change how we use your personal data.

**By using the Revolut app, you confirm that you have read and agree to us processing your personal data in the manner set out in this Privacy Notice. Please do not use the Revolut app if**

**you do not agree to this Privacy Notice.**

### **3. What personal data do you collect about me?**

Type of personal data	Details
Information you give us	<p>We collect information you provide when you:</p> <ul style="list-style-type: none"><li>✓ fill in any forms</li><li>✓ correspond with us</li><li>✓ respond to any of our surveys</li><li>✓ register to use the Revolut app</li><li>✓ open an account or use any of our services</li><li>✓ take part in online discussions or promotions</li><li>✓ speak with a member of our social media or customer support teams (either on the phone or through the Revolut app)</li><li>✓ enter a competition or share information with us on social media</li><li>✓ contact us for other reasons</li></ul> <p>We will collect the following information:</p> <ul style="list-style-type: none"><li>✓ your name, address, and date of birth</li><li>✓ your email address, phone number and details of the device you use (for example, your phone, computer or tablet)</li><li>✓ your Revolut username (this is random and is automatically assigned to you when you first join but you will be able to change it)</li><li>✓ information regarding the source of your funds</li><li>✓ your registration information</li><li>✓ details of your bank account, including the account number, sort code and IBAN</li><li>✓ copies of your identification documents (for example, your passport or driving licence) and any other information you provide to prove you are eligible to use our services</li><li>✓ your country of residence, tax residency information, and tax identification number</li><li>✓ records of our discussions, if you contact us or we contact you (including records of phone calls)</li></ul>

Type of personal data	Details
	<p>✓ your image in photo form (where required as part of our Know-Your-Customer (KYC) checks, to verify your identity if you contact us when logged out of your Revolut account, or where you upload a photo to your Revolut account)</p> <p>✓ information about other people (such as your spouse or family) when we ask you to give us this information to enable us to comply with our obligations under KYC, anti-money laundering laws and to assist with fraud monitoring</p> <p>If you give us personal data about other people (such as your spouse or family), or you ask us to share their personal data with third parties, you confirm that you have brought this notice to their attention beforehand.</p> <p>We often need you to provide personal data in order to provide you with our services. For example, we may need to collect certain information about you to comply with our obligations under AML laws to be able to provide you with the services. If you do not provide us with any information we request from you which we need to provide the services, then you will not be able to use the relevant services.</p>
Information collected from your use of our products and services	<p>Whenever you use the Revolut app, we collect the following information:</p> <p>✓ technical information, including the internet protocol (IP) address used to connect your device to the internet, your login information, the browser type and version, the time zone setting, the operating system and platform, the type of device you use, a unique device identifier (for example, your device's IMEI number, or the mobile phone number used by the device), mobile network information, your mobile operating system and the type of mobile browser you use</p>

Type of personal data	Details
	<p>✓ information about your visit, including the links you've clicked on, through and from our app (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling and clicks), and methods used to browse away from the page</p> <p>✓ information on transactions and your use of Revolut products (for example, payments made using your account), including the date, time, amount, currencies, exchange rate, beneficiary details, IP address of sender and receiver, sender's and receiver's name and registration information, messages sent or received, details of device used to arrange the payment and the payment method used</p> <p>✓ information stored on your device, including if you give us access to contact information from your contacts list. The Revolut app will regularly collect this information in order to stay up to date (but only if you have given us permission)</p>
Information about your location	If you turn location services on in the Revolut app, we track your location using GPS technology.
Information from others	We collect personal data from third parties or other people, such as financial or credit institutions, official registers and databases, fraud prevention agencies and partners who help us to provide our services.
Information from social media	Occasionally, we'll use publicly available information about you from selected social media websites or apps to carry out enhanced due diligence checks. Publicly available information from social media websites or apps may also be provided to us when we conduct general searches on you (for example, to comply with our anti-money laundering or sanctions screening obligations).

Type of personal data	Details
Information from publicly available sources	We collect information and contact details from publicly available sources, such as media stories, online registers or directories, and websites for enhanced due diligence checks, security searches, and KYC purposes.

#### 4. How do you use my personal data?

We use your personal data for the following purposes:

##### Providing our services

Whenever you sign up with Revolut, apply for or use a product or service, we'll use your personal data to:

- check your identity (as part of our KYC process)
- decide whether or not to approve your application
- meet our contractual and legal obligations relating to any products or services you use
- provide you with customer support services. We may record and monitor any communications between you and us, including phone calls, to maintain appropriate records, check your instructions, analyse, assess and improve our services, and for training and quality control purposes

##### Protecting against fraud

We use your personal data to check your identity to protect against fraud, keep to financial crime laws and to confirm that you're eligible to use our services. We also use it to help us better understand your financial circumstances and manage fraud risks related to your Revolut account.

##### Marketing and providing products and services that might interest you

We use your personal data to do the following:

- to send you in-app experience and marketing messages about our products and services (where allowed by law). These may be tailored to your interests to ensure they are relevant to you
- if you agree, provide you with information about our partners' promotions or offers which we think you might be interested in
- if you agree, allow our partners and other organisations to provide you with information about their products or services

- measure or understand the effectiveness of our marketing and advertising, and provide relevant advertising to you
- ask your opinion about our products or services

Remember, you can ask us to stop sending you marketing information by adjusting your marketing choices (the section headed '*How do you use my personal data for marketing?*' below explains how to do this).

### **To keep our services up and running**

We use your personal data to manage the Revolut app (including troubleshooting, data analysis, testing, research, statistical and survey purposes), and to make sure that content is presented in the most effective way for you and your device.

We also use your personal data to:

- verify your identity if you contact our customer support or social media teams
- allow you to take part in interactive features of our services
- tell you about changes to our services
- help keep the Revolut app safe and secure

### **Helping with social interactions**

We use your personal data to help with social interactions through our services, or to add extra functions in order to provide a better experience.

For example, if you give us permission, we'll use the contacts list on your phone so you can easily make payments to, or message, your contacts using the Revolut app.

### **Providing location-based services**

If you turn location services on in the Revolut app, we use your personal data to:

- provide you with products and services
- protect against fraud

### **Improving 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 provide products and services that our customers want to use.

### **Meeting our legal obligations, enforcing our rights and other legal uses**

We use your personal data:

- to share it with other organisations (for example, government authorities, law enforcement authorities, tax authorities, fraud prevention agencies)
- to recover debts from you
- if this is necessary to meet our legal or regulatory obligations
- to identify and support vulnerable customers by analysing your behaviour in the Revolut app, customer support communications and through transactions
- in connection with legal claims
- to help detect or prevent crime

You can find out more in the section headed '*Do you share my personal data with anyone else?*' section below.

Sometimes, we're legally required to ask you to provide information about other people. For example, we might ask you to explain how somebody got the money in the first place they are transferring to you.

## **5. How do you use my personal data for marketing?**

If you sign up to our services, and where national laws allow, we'll assume you want us to contact you by post, push notification, email and text message with information about Revolut products, services, offers and promotions. Where national laws require us to get your consent to send marketing messages, we'll do so in advance.

We use your personal data to personalise marketing messages about our products and services so they are more relevant and interesting to you (where allowed by law).

You can object to profiling for direct marketing purposes. You can also adjust your preferences or tell us you don't want to hear from us at any time. Just use the privacy settings in the Revolut app or tap the unsubscribe links in any marketing message we send you.

If you do not want to receive marketing messages, and opt out from receiving them, you will not receive any marketing communications. However, you may still receive generic information about our products and services in the Revolut app.

We won't pass your details on to any organisations outside the Revolut group of companies for their marketing purposes without your permission. You can find out more in the section headed '*Do you share my personal data with anyone else?*' below.

## **6. What are my rights?**

Depending on where you live, you may have certain rights in relation to your personal data. These rights may include:

- The right to request a copy of the personal data we hold about you (note, however, that we will not provide you with your personal data where exemptions apply under applicable law)
- The right to ask us to correct your personal data if you think it's wrong
- The right to ask us to delete your personal data in certain circumstances
- The right to object to us processing your personal data for marketing purposes
- The right to ask us to restrict how we use your personal data in certain circumstances
- The right to ask us to transfer personal data to you or another company in a structured, commonly used, machine-readable format in certain circumstances
- The right to withdraw your permission (where you have previously given us this)
- The right to ask us to carry out a human review of an automated decision we make about you

Your ability to exercise these rights will depend on a number of factors. Sometimes, we won't be able to agree to your request (for example, if the right does not apply to the particular information we hold about you).

## 7. How do I exercise my rights?

To exercise any of your rights set out in the previous section, you can contact us through the Revolut app or send us an email at [dpo@revolut.com](mailto:dpo@revolut.com).

When you exercise one of your rights, or update your privacy settings in the Revolut app, we will respond or implement your changes in accordance with the timeframe set out under applicable laws.

You also have the right to make a complaint at any time to the PDPC in Singapore. Subject to local data protection laws, you may also have the right to lodge a complaint with the data protection supervisory authority in your own country.

## 8. Do you share my personal data with anyone else?

We may share your personal data with the following third parties to achieve the purposes set out in the section headed '*How do you use my personal data?*' above or in the circumstances described below:

Category of third party	Reason for sharing
Revolut group companies	To provide you with the services you have requested and send you information about Revolut products and services we think you'll be interested in hearing about



Category of third party	Reason for sharing
Other Revolut customers	As necessary to provide you with our services (for example, you will be viewable to your contacts if you and your contacts who use Revolut choose to sync your mobile phone contact list).
People or companies that you transfer money to or receive money from	When you make a payment through your Revolut account or receive payment into your Revolut account, we'll provide the recipient or the payer (as applicable) with your details to comply with our obligations as a payment institution.
Third party service providers	We share your personal data with a range of service providers who help us to provide our services. For example, we share your personal data with IT service providers, banking and financial services partners, KYC and client due diligence providers, customer support service providers and communications services providers.
Other partners who help to provide our services	We may share your personal data with our partners to provide certain services you've asked us for. We'll only share your personal data in this way if you've asked for the relevant service.
Other financial institutions	In certain circumstances, we may share your personal data with other financial institutions. For example, if a payment is made to your account by mistake, we can share your information with the financial institution, or Revolut customer, the payment came from.
For legal reasons	<p>We share your personal data with other financial institutions, government authorities, law enforcement authorities, tax authorities, companies and fraud prevention agencies to check your identity, protect against fraud, keep to laws and confirm that you're eligible to use our products and services. We may also need to share your personal data with other organisations or authorities:</p> <ul style="list-style-type: none"> <li>• if we have to do so under any law or regulation</li> </ul>

Category of third party	Reason for sharing
	<ul style="list-style-type: none"> <li>• if we sell our business portfolio</li> <li>• in connection with criminal or fraud investigations</li> <li>• to enforce our rights (and those of customers or others)</li> <li>• in connection with legal claims</li> </ul>
Social media and advertising companies	We may share your personal data with social media and advertising companies to help us to carry out marketing activities. You can also use the privacy settings in the Revolut app to opt out from having your personal data shared in this way
Where you ask us to share your personal data	Where you direct us to share your personal data with a third party, we may do so. For example, you may authorise third parties to act on your behalf (such as a lawyer, accountant or family member or guardian under a power of attorney). We may need to ask for proof that a third party has been validly authorised to act on your behalf.

## 9. Will my personal data be transferred outside my country of residence?

Revolut is located in Singapore and has affiliates in countries around the world. Given we provide our service in various countries internationally, we need to transfer your personal data outside the country you live to provide you with our services. For example, our main data hosting facilities are located in the United Kingdom and European Union. By using our services, you agree to us transferring your personal data internationally.

We will always take steps to make sure that your personal data is sufficiently protected when we transfer it internationally. For example, we will enter into contracts with third party recipients containing strict data protection safeguards before we transfer your personal data to them.

## 10. How do you protect my personal data?

We recognise the importance of protecting and managing your personal data. Any personal data we process will be treated with the utmost care and security. This section sets out some of the security measures we have in place.

We use a variety of physical and technical measures to:

- keep your personal data safe

- prevent unauthorised access to your personal data
- make sure your personal data is not improperly used or disclosed

Electronic data and databases are stored on secure computer systems with control over access to information using both physical and electronic means. Our staff receives data protection and information security training. We have detailed security and data protection policies which staff are required to follow when they handle your personal data.

While we take all reasonable steps to ensure that your personal data will be kept secure from unauthorised access, we cannot guarantee it will be secure during transmission by you to our app, a website or other services. We use HTTPS (HTTP Secure), where the communication protocol is encrypted through Transport Layer Security for secure communication over networks, for all our app, web and payment-processing services.

If you use a password for the Revolut app, you will need to keep this password confidential. Please do not share it with anyone.

When you use our public services, which includes our social network accounts and the Revolut Community forum, do not share any personal data that you don't want to be seen, collected or used by other customers, as this personal data will become publicly available.

## **11. How long will you keep my personal data for?**

We'll generally keep your personal data for as long as necessary to achieve the purposes for which we collected it, or for a longer period if this is required by law.

For example, we're required to keep certain of your personal data to comply with our obligations under applicable anti-money laundering and e-money laws. The period for which we are required to keep data for this purpose may vary depending on the country in which you live.

We may also keep your personal data for longer because of a potential or ongoing court claim, or for another legal reason.

## **12. How will you keep me updated about how you use my personal data?**

If we change the way we use your personal data, we'll update this notice and, if appropriate, let you know by email, through the Revolut app or through our website.

## **13. Do you use cookies?**

We use cookies and similar technologies (such as SDKs) ("cookies") to analyse how you use our app.

The cookies we use include:

- Strictly necessary cookies - these are cookies which we need to operate the app.

- Analytical and performance cookies - these allow us to recognise and count the number of visitors to our app, and see how visitors browse around our app, so we can improve it where necessary.
- Targeting cookies - these cookies allow us to optimise our marketing campaigns and provide more relevant ads. We may share the information we obtain through these cookies with other organisations for these purposes.

We also use pixels or web beacons in the direct marketing emails that we send to 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 for analytics. You can control whether you receive direct marketing emails through the privacy settings in the Revolut app.

## Appendix - Country-specific terms

Please check this Appendix for additional information relating to the country where you live (if applicable). In case of any conflict between the wording in this Appendix and the rest of this notice, this Appendix will prevail.

### **Argentina**

This section contains additional provisions which apply to customers located in Argentina.

#### Local data protection regulator

The Agency for Access to Public Information ("**AAIP**") is responsible for assisting customers in connection with data privacy complaints. The contact details of the AAIP are as follows:

- Address - Av. Pte. Gral. Julio A. Roca 710, piso 3;
- Email address - info@aaip.gob.ar.

#### International transfers

By accepting this privacy notice, you authorise us to transfer your data outside of Argentina, including to the United Kingdom and European Economic Area, in compliance with Disposition 60/2016 of the AAIP (as amended). We agree and confirm that we will comply with every Argentine regulation applicable to any such data transfer, and that each data processor we appoint will be subject to appropriate contractual commitments to protect your data and required to process your data according to the purposes set out in this notice.