

# The basics

## 1. About us

This is the privacy policy (the "**Privacy Policy**") of Revolut Payments New Zealand Pty Ltd ("**Revolut**", "**we**", "**us**" and "**our**"). We are an Australian incorporated proprietary company (ACN 645 171 651) registered as an ASIC-Overseas company in New Zealand (NZBN 9429048733212). Our registered address in Level 28, 161 Castlereagh Street, Sydney, NSW, 2000 Australia.

We are a financial service provider, registered in New Zealand under the Financial Services Providers (Registration and Dispute Resolution) Act 2008.

We are committed to protecting and respecting your privacy in accordance with the Privacy Act 2020 ("**Privacy Act**") and the NZ Information Privacy Principles ("**IPPs**").

We will:

- take steps to always keep your information safe and private in accordance with this policy;
- only use your information for the purposes described in the policy;
- never sell your information; and
- allow you to manage and review your personal information and marketing choices at any time.

## 2. Why do I need to read this Privacy Policy?

This policy contains important information regarding how we deal with your personal information and your rights in relation to your personal information.

**Personal information** is defined in the Privacy Act and constitutes information about an identifiable individual.

This Privacy Policy explains:

- what personal information we collect;
- how we use your personal information; and
- your rights if you want to change how we use your personal information.

Specific Revolut products and services you use may have standalone privacy notices which give you more detail about how we collect, use and protect your personal data when you use those specific Revolut products or services. These include:

- [New Zealand Privacy Notice for Revolut Kids & Teens](#).

Sometimes, we may also provide you with standalone 'just in time' privacy explanations in the Revolut app. When you use a new Revolut product or service for the first time:

- these explanations will help you to understand what specific personal data Revolut collects, uses or shares about you for that product or service
- where relevant, you will be prompted to review your in-app privacy preferences

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

## Your personal information

### 3. What personal information do you collect about me?

#### **Personal Information**

We collect different types of personal information about you, which includes a range of information that is used to identify you. This includes information such as your

name, address, date of birth and phone number. The kinds of personal information we collect and how we collect it are set out below.

### How do we collect your personal information?

The table below explains what personal information we collect and use.

Type of personal information	Details
Information you give us	<p><u>We collect information you provide when you:</u></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 any of our apps</li><li>✓ register, or approve a registration for, a child to use the Revolut Kids &amp; Teens app</li><li>✓ open an account or use any of our services</li><li>✓ take part in online discussions or promotions</li><li>✓ communicate with a member of our social media or customer support teams (either on the phone or through our apps)</li><li>✓ enter a competition or share information with us on social media</li><li>✓ contact us for other reasons</li></ul> <p><u>We will collect the following information:</u></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 which is known as your 'Revtag' (this is random and is automatically assigned to you when you first join but you will be able to change it)</li><li>✓ details of your bank account, including the account number, BSB and IBAN (if relevant)</li><li>✓ details of your Revolut debit cards and credit cards (or other debit or credit cards you have registered with us) including the card number, expiry date and CVC (the last three digits of the number on the back of the card)</li><li>✓ copies of your identification documents (for example, your passport or driving licence) and any other</li></ul>

Type of personal information	Details
	<p>information you provide to prove you are eligible to use our services</p> <ul style="list-style-type: none"> <li>✓ your country of residence, tax residency information, and tax identification number</li> <li>✓ information you provide when you sign up for wealth, trading or crypto products, including details about your employment and salary</li> <li>✓ information you provide when you register or approve your children to use Revolut Kids &amp; Teens</li> <li>✓ information about any existing accounts or holdings you hold with other companies that you want to transfer to Revolut</li> <li>✓ records of our discussions, if you contact us or we contact you (including records of phone calls)</li> <li>✓ your image in photo or video form, and facial scan data extracted from your photo or video (known as 'biometric data'), to verify your identity during onboarding as part of our Know-Your-Customer (KYC) checks, to authenticate you as an authorised user of our services, or to detect and prevent fraud</li> <li>✓ information about other people (such as a joint account holder, 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 and other laws and to assist with fraud monitoring</li> </ul> <p>If you give us personal information about other people (such as a joint account holder, your spouse or family), or you ask us to share their personal information with third parties, you confirm that you have brought this notice to their attention beforehand.</p>
Information collected from your use of our products and services	<p><u>Whenever you use our website or apps, we collect the following information:</u></p> <ul style="list-style-type: none"> <li>✓ technical information, including the internet protocol (IP) address used to connect your computer to the internet, your login information, the browser type and</li> </ul>

Type of personal information	Details
	<p>version, the time zone setting, device language, the operating system and platform, the type of device you use, whether your device uses a virtual private network (VPN), 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> <p>✓ information about your visit, including the links you've clicked on, through and from our website or 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 into and out of your account), including the date, time, amount, currencies, exchange rate, beneficiary details, details of the merchant or ATMs associated with the transaction (including merchants' and ATMs' locations), IP address of sender and receiver, sender's and receiver's name and registration information, messages sent or received, details of devices used to arrange the payment and the payment method used. When you book flights using your Revolut card, we may also receive information about your flight's origin, destination, airline, travel class, and so on</p> <p>✓ information stored on your device, such as the types of apps you have and other metadata about your device. If you allow us access, we may also collect information from your contacts list. The relevant Revolut app will regularly gather this information to keep everything up to date, based on your device settings</p>

Type of personal information	Details
Information about your location	If you turn location services on in the relevant Revolut app, we track your location using GPS technology and your IP address.
Information from others	<p>We collect personal information from third parties or other people, such as official registers and databases, as well as joint account holders, fraud prevention agencies, other third parties providing fraud prevention services, and partners who help us to provide our services.</p> <p>Information we collect may include your external crypto wallet details, tax identification numbers, information to help us check your identity or eligibility to receive selected Revolut products or services, fraud risk scores and information relating to your transactions.</p> <p>Sometimes other Revolut customers may give us information about you. For example, a Revolut customer may tell us that you have behaved inappropriately and provide us with evidence to support their claim.</p>
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).
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. Why do you collect, use and hold my personal information?

You must voluntarily agree to us collecting, using, sharing and storing your information, for example by using the Revolut app or when you have otherwise indicated your consent, for us to use your personal information in a certain way.

We collect, use and hold your personal information to:

- process your applications for our products and services and make decisions about whether to approve applications;
- assess your application for our products and services;
- verify your identity (including using electronic sources, government records and identity verification services, and credit reporting agencies);
- issue and maintain our products and services that you've asked for;
- respond to your inquiries about applications, products, services and arrangements;
- analyse, develop and improve our products and services (including, through focus groups to test and develop new products);
- measure or analyse the effectiveness of our advertising, to provide relevant advertising to you;
- help develop and improve our website, Revolut app and the portal;
- comply with our legal and regulatory obligations both in New Zealand and overseas;
- share information with regulators, New Zealand and overseas government agencies and law enforcement;
- deal with complaints, disputes or in connection with legal claims;
- detect fraud and suspicious activity and deal with criminal or fraud investigations;
- carry out your instructions (such as payment, foreign exchange or transaction processing);
- provide you with information about ours or our partners' goods, services or promotions, which we think you might be interested in. To help us do this, we may use information about you to help us better understand your interests. You can opt out of this by using the help service through the Revolut app, the portal or by emailing us at [dpo@revolut.com](mailto:dpo@revolut.com);
- provide you with information about other goods and services we offer that are similar to those you have already used or asked about;
- if you agree, allow our partners and other organisations to provide you with information about their goods or services;

- train our staff to continuously improve our customer service;
- help us send you emails, push notifications and text messages;
- protect you against fraud and financial crime;
- implement and manage our funding arrangements, including any securitisation arrangements we enter into;
- to help us identify if you may need extra assistance. You can let us know if you need help, or we may analyse your behaviour in the relevant Revolut app, customer support chats, and transactions;
- any purpose relating to organisations that have, or are wishing to acquire an interest in any part of our business from time to time; and
- enforce our rights, including undertaking debt collection activities and legal proceedings (and those of customers or others).

We also use your personal information to allow you to take part in interactive features of our services, to tell you about changes to our services, and to help keep our website and the Revolut app safe and secure.

If any changes we make to our services affect you, we'll normally contact you using the email address you gave us when you signed up, or through the Revolut app, to tell you about the changes.

## 5. Do I have to provide my information?

At certain times we are required to collect your personal information to comply with New Zealand laws, including:

- to verify your identity and comply with our obligations under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009;
- under New Zealand and international laws, including the Privacy Act and the IPPs, we may collect and report financial and account/transaction information relating to individuals and organisations who are, or may be, foreign tax residents. When you open an account with us, or when your circumstances change, we will ask you whether you or any shareholder, beneficiary, settlor or controlling person are a foreign tax resident; and
- if you are subject to bankruptcy proceedings under the Insolvency Act 2006.



If you don't provide all or some of your personal information when we ask for it, we may be unable to provide you with our products or services.

## 6. Do you share my personal information with anyone else?

For the purposes stated above, we may need to share information about you to:

- our related companies in the Revolut Group (including in Australia and overseas);
- people connected with your Revolut product. For example, if you have Revolut Kids & Teens we may share personal information between the user and the account holder. If you have a joint account, we will share account and transaction information between joint account holders. For example, each joint account holder will see all transactions made from their joint account. We may also share your personal information (such as your full name and profile picture) to other users if you opted into this search functionality;
- suppliers who provide us with identity verification and KYC services, and fraud detection and prevention services;
- suppliers who provide us with IT, artificial intelligence, payment and delivery services, card manufacturing, personalisation and delivery companies;
- sales agents and organisations that carry out functions on our behalf;
- data processing and market research service providers;
- analytics providers and search information providers;
- communications services providers;
- customer-service providers, survey providers and developers;
- law enforcement and regulatory bodies in New Zealand and overseas;
- financial, legal and other professional advisors;
- participants in financial and payment systems, such as banks, credit providers, clearing entities and credit card associations, banking intermediaries and international payment-service providers including Visa and Mastercard;
- providers of loyalty incentives, rewards and other benefits in connection with a Revolut account or service;
- other companies that we partner with to provide products and services (for example, Chubb Insurance New Zealand Limited), and their affiliates and service providers;

- our external dispute resolution schemes, including Financial Services Complaints Limited;
- organisations that have acquired, or are wishing to acquire an interest in any part of our business from time to time; and
- third parties who you authorise to act on your behalf, are connected with you or with whom you direct us to share information (such as accountants, lawyers or other service providers).

## **PARTNERS WHO HELP TO PROVIDE OUR SERVICES**

We may share your personal information with our partners in order to provide you with certain services you have asked us for. Some of these partners may be located overseas. When you provide your personal information to us, you consent to the disclosure of your information outside the country of your residence.

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 information with those partners. We will always get your consent before sharing your information for these purposes. You can withdraw your consent at any time by contacting us through the Revolut app.

Our partners will have their own privacy notice explaining how they use your personal information. It's important that you read those privacy notices as well.

## **SOCIAL MEDIA AND ADVERTISING COMPANIES**

When we use social media for marketing purposes, your information may be shared with the social-media platforms so that they can check if you also hold an account with them. If you do, we may ask the advertising partner or social-media provider to:

- help us understand and measure the effectiveness of our online advertising;
- use your information to send our advertisements to you, because we think that you might be interested in a new Revolut product or service;
- not send you our advertisements, because the marketing relates to a service that you already use; or
- send our advertisements 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 the ones on your social-media profile, we may ask our advertising partner or social-media partner to send our adverts for that service to those people).

An example of how we may use social media for marketing purposes is through Facebook's 'Custom Audience' tool. [Read more about these terms.](#)

We may also share your information (your name, email address and app events) with our advertising partners in the ways described above, but the information is hashed before we send it, and the social-media platform we share it with is only allowed to use that hashed information in the ways described below.

You can contact us at any time through the Revolut app if you do not want us to share your personal information for marketing purposes. Remember you can also manage your marketing preferences directly with any social-media provider that you have an account with.

## 7. How do you use my information for marketing?

When you sign up to our products or services, you agree to us contacting you in the Revolut app, by email post and phone (including text message) with offers and promotions.

We may use your personal information to personalise your in-app experience and marketing messages about our products and services so they're more relevant to you (where permitted by law). This may include analysing how you use our products, services and your transactions.

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

You can adjust your preferences, or tell us you don't want to hear from us, at any time. Just use the 'Privacy' section within the 'Profile' section of the Revolut app or click on the unsubscribe links on any marketing message we send you.

If you do not want to receive personalised 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 within our apps.

We won't pass your details on to any organisations outside the Revolut Group for their marketing purposes without your permission.

# Your rights

## 8. What are my rights?

### **8.1 You have the right to be told about how we use your personal information.**

We provide this privacy policy to explain how we use your personal information.

You can ask to see the personal information we hold about you.

### **8.2 You can ask to access your personal information.**

You have a general right to access your personal information when you request it, except where we have the right to refuse your request under IPP 6.

To request access to your information please contact us through the Revolut app and provide:

- your name and contact details;
- the personal information you want to access; and
- how you'd like to access the information (such as receiving a copy by email or post).

We will respond to any request for access to personal information within 20 Business Days.

If you are making the request on behalf of someone else (for example, if you have our Revolut Kids & Teens product and are requesting access on behalf of someone else connected to the product) we may ask you for information to verify your identity or your authority to make the request.

We may refuse your request if there is a valid reason to do so, including:

- if we believe giving you access may endanger the life, health or safety of an individual;
- giving you access would have an unreasonable impact on the privacy of other individuals;
- your personal information is part of existing or anticipated legal proceedings between us and would not be discoverable;

- giving access would reveal commercially sensitive information within our negotiations;
- giving access would be unlawful, or denying access is required or authorised by or under New Zealand law;
- we suspect that unlawful activity, or misconduct of a serious nature has taken place and giving access would likely prejudice appropriate action in relation to the matter;
- giving access would likely prejudice one or more enforcement related activities from an enforcement body; or
- giving access would reveal evaluative information generated in connection with a commercially sensitive decision-making process.

Requesting your personal information is free of charge. However, there may be a charge for locating, retrieving and providing the personal information to you.

Your right to access does not interfere with any rights you may have under the Official Information Act 1982.

### **8.3 You can ask us to correct your personal information if you think it's wrong.**

You can request to have personal information corrected if it is inaccurate, out of date, incomplete, irrelevant or misleading. You may first need to request access to the personal information we hold.

Where we consider that the personal information should be corrected, we will take reasonable steps to correct that information having regard to the purpose that we hold the information.

If we correct the information and you ask us to, we will take reasonable steps to notify others of the correction unless it is impracticable or unlawful to do so.

We will respond to any request to correct personal information within 20 Business Days. Before we update your file, we may need to check the accuracy of the new information you have provided.

Where we have refused your correction request, you can request that we provide a statement of correction to our records. If requested by you, we will take reasonable steps to do so. You may raise a complaint about our refusal to the Privacy Commissioner.

#### **8.4 You can object to us using and disclosing your personal information for marketing purposes.**

You can tell us to stop using your personal information for marketing. You may also withdraw any marketing consent you have given us or adjust your marketing preferences in the Revolut app.

You may also ask us to provide you with the source of your personal information which was used for marketing purposes. We will provide you with a response within a reasonable timeframe unless it is impractical or unreasonable to do so.

#### **8.5 You can withdraw your permission.**

If you have given us any consent we need to use your personal information, you can withdraw your consent at any time by changing your settings in the Revolut app. We may not be able to continue to provide services to you if you have withdrawn your consent.

#### **8.6 Anonymity and using a pseudonym**

You may ask us to deal with you anonymously or using a pseudonym. However, we may refuse to do so if we're required by New Zealand law or it is practicable for us to do so.

### **9. How do I raise a complaint?**

If you have a complaint about our management of your information in breach of the Privacy Act, IPPs or any applicable privacy code, you can reach out to us anytime via our in-app chat to request a Complaint Form. For your convenience, you can also find the links to our Complaint Forms [here](#).

Alternatively, you can send us an email to [dpo@revolut.com](mailto:dpo@revolut.com). If you prefer to send your complaint via email, please ensure to include the following details:

- your full name;
- your phone number linked to the relevant Revolut Account;
- your email address linked to the relevant Revolut Account;
- the date when the issue happened; and
- details of your proposed resolution for your complaint.

After submitting your complaint, we'll let you know that we received your email and also give you a timeframe when we expect a response by. Then we'll send you a copy of your complaint so you can keep it for your own records. We may contact you to gather more information relating to your complaint. A dedicated member of our complaints team will investigate the matter for you.

If we have everything we need, we will do our best to provide you with the final response within 20 Business Days and will clearly mention whether our response is final or not.

If you are not happy with our response or we have not responded within 20 Business Days, you may lodge a complaint with the Office of the Privacy Commissioner which is free to customers.

You can make a complaint using the Privacy Commissioner's online complaint form available at <https://privacy.org.nz/your-rights/making-a-complaint/complaint-form/>.

## 10. Will my information go outside New Zealand?

As we provide an international service, we may need to disclose your personal information outside within the Revolut group but outside of New Zealand in order for us to provide our services. We may accordingly disclose your personal information outside of Australia and New Zealand to our group entities in the United Kingdom and European Economic Area.

As noted above, we may also share your personal information with overseas parties, for example if you ask to make an international payment, we will send funds to banks overseas. We might also send your information overseas to keep to global legal and regulatory requirements, and to provide ongoing support services.

Where your personal information is sent outside New Zealand, we will ensure that IPP 12 is followed or we otherwise obtain your consent to send your personal information outside of New Zealand.

Regardless of where your personal information is transferred, we shall ensure that your personal information is safe and shall take all steps reasonably necessary to put in place appropriate safeguards to ensure that your personal information is treated securely and in accordance with this notice and applicable law.



If you would like more information, please contact us through the Revolut app.

## 11. How do you protect my personal information?

We recognise the importance of protecting and managing your personal information. Any personal information we use 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 organisational and technical measures to:

- maintain the confidentiality, availability and integrity of your personal information
- prevent unauthorised access to your personal information
- make sure your personal information is not improperly used or disclosed

We have detailed information security and data protection policies which our employees are required to follow when they handle your personal information. Our employees receive data protection and information security training. Personal information is stored on secure computer systems with access management controls in place to limit physical, system and information access to only authorised employees.

Revolut has strict policies in place that control how we share your personal information with other companies. Before sharing personal information with any company, we thoroughly:

- vet the company in advance
- assess the security controls the company has in place to protect your personal information

While we take all reasonable steps to ensure that your personal information will be kept secure from unauthorised access, we cannot guarantee it will be secure during transmission by you to our app, our website or other services we may provide. 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.

You are responsible for keeping your Revolut account secure by keeping your passwords, PINs, and one-time passcodes private. Do not share this information with anyone, as it may allow them access to your Revolut account and personal



information. Remember, Revolut will never ask you for these details through phone calls, emails, or texts.

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

Some of the features we make available in the Revolut app are social in nature. This means that other Revolut customers may be able to see limited information about you (such as your name and profile picture). For example, if a Revolut user searches for your RevTag in the Revolut app, they may be able to see your full name and profile picture if you have opted into this search functionality. If you do not want to share such information, you can change your privacy settings in the Revolut app at any time.

## 12. How long will you keep my personal information for?

In New Zealand, we will not keep your personal information longer than necessary or required by law. Generally, this means we will retain personal information for up to seven years (subject to any specific regulatory record keeping requirements).

## 13. How will you keep me updated on how you use my information?

If we change the way we use your personal information, we will update this policy and, if appropriate, let you know by text message, by email, through the Revolut app or through our website.

## 14. Cookies

We use cookies to analyse how you use our website. Please read our [Cookies Policy](#) for more information about cookies.

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 relevant Revolut app.