

# CUSTOMER PRIVACY POLICY

**Effective date: December 13, 2023**

Previous versions: Available [here](#)

Pulse [aquí](#) para leer la Política de privacidad en español.

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

We are Revolut, a global financial super app. Our technology company, Revolut Technologies Inc., offers a platform through which customers may access a variety of financial products and services in the United States offered by our affiliates, licensed banks, and trust companies. Our broker-dealer company, Revolut Securities Inc., offers trading products. Our Investment Advisory, Revolut Wealth Inc., offers automated investing. Each of these Revolut products is available via the Revolut App and the Revolut Website Application.

This Privacy Policy covers Revolut Technologies Inc., Revolut Securities Inc., and Revolut Wealth Inc.'s services in the United States.

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

We collect your personal data when you use:

- our website at [www.revolut.com/en-US/](http://www.revolut.com/en-US/)
- the Revolut app
- any of the services available to you through the Revolut app or website

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

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

- we know about you (for example, we know when you use your Revolut card to pay for things)
- can be used to personally identify you (for example, a combination of your name and postal address)

This policy explains what information we collect, how we use it, and your rights over your personal data.

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

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

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

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

Type of Personal Data	Details
Information you give us	<div>We collect information you provide when you:</div> <div><div>✓ fill in any forms</div><div>✓ correspond with us</div><div>✓ respond to any of our surveys</div><div>✓ register to use the Revolut app</div><div>✓ register, or approve a registration for, a child to use the Revolut &lt;18 app</div><div>✓ open an account or use any of our services</div><div>✓ give us access to your other financial accounts</div><div>✓ take part in online discussions or promotions</div><div>✓ speak with a member of our social media or customer support teams (either on the phone or through the Revolut app)</div><div>✓ enter a competition, promotions, or share information with us on social media</div><div>✓ contact us for other reasons</div></div> <div>We will collect the following information:</div> <div><div>✓ your name, address, social security number, and date of birth</div></div>

Type of Personal Data	Details
	<p>✓ your email address, phone number and details of the device you use (for example, your phone, computer or tablet)</p> <p>✓ 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)</p> <p>✓ your registration information</p> <p>✓ details of your bank account, including the account number, sort code and ABA routing number or SWIFT code</p> <p>✓ 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)</p> <p>✓ copies of your identification documents (for example, your passport or driver's license) and any other information you provide to prove you are eligible to use our services</p> <p>✓ your country of residence, tax residency information, and tax identification number</p> <p>✓ information you provide when you apply for credit, including details about your, or your spouse's, income and financial obligations</p> <p>✓ information you provide when you sign up for wealth and trading products, including details about your employment and salary</p> <p>✓ information you provide when you register or approve your children to use Revolut &lt;18</p>

Type of Personal Data	Details
	<p>✓ records of our discussions, if you contact us or we contact you (including records of phone calls)</p> <p>✓ 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 authorized user of our services, or to detect and prevent fraud</p> <p>✓ your image in photo or video 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 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 laws and other laws to assist with fraud monitoring</p> <p>If you give us personal data about other people (such as a joint account holder, your spouse or family), or you ask us to share their personal data with third parties, you confirm that you have brought this policy to their attention beforehand.</p>
Information collected from your use of our products and services	<p>Whenever you use our website or the Revolut app, we collect the following information:</p> <p>✓ technical information, including the internet protocol (IP) address used to connect your computer to the internet, your login information, the browser type and version, the time zone setting, device language, the operating system and platform, the type of device you use,</p>

Type of Personal Data	Details
	<p>whether your device uses a virtual private network (VPN), a unique device identifier (for example, your device's IMEI number, the MAC address of the device's wireless network interface, 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 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 credit reference agencies, financial or credit institutions,

Type of Personal Data	Details
	<p>official registers and databases, as well as joint account holders, fraud prevention agencies and partners who help us to provide our services.</p> <p>This includes your credit record, information about late payments, information to help us check your identity, information about your spouse and family (if applicable in the context of an application for credit that you make) and information relating to your transactions.</p> <p>When you ask us to, we'll also collect personal data from accounts you hold with third party financial institutions (when you create a linked account by activating Open Banking in the Revolut app). If you apply for our credit products, when you allow us, we may use this information for credit checks.</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. What is your legal basis for using my personal data?

We must have a legal basis (a valid legal reason) for using your personal data. Our legal basis will be one of the following:

**Keeping to our contracts and agreements with you**

We need certain personal data to provide our services and cannot provide them without this personal data.

**Legal obligations**

In some cases, we have a legal responsibility to collect and store your personal data (for example, under anti-money laundering laws we must hold certain information about our customers).

**Legitimate interests**

We sometimes collect and use your personal data because we have a legitimate reason to use it and this is reasonable when balanced against your human rights and freedoms.

**Substantial public interest**

Where we process your personal data, or your sensitive personal data (sometimes known as special category personal data), to adhere to government regulations or guidance, such as our obligation to prevent fraud or support you if you are or become a vulnerable customer.

**Consent**

Where you've agreed to us collecting your personal data, or sensitive personal data, for example when you tick a box to indicate you're happy for us to use your personal data in a certain way.

We explain more about how we use your personal data in the ***How do you use my personal data?*** section below.

5. How do you use my personal data?

Explore the ways in which we may use your personal data using this table:

What we use your personal data for	Our legal basis for using your personal data
<p><b>Checking your identity</b></p> <p>Whenever you sign up with Revolut, we'll use your personal data to check your identity or the identity of joint account holders (as part of our KYC process).</p> <p>This may include facial scan data extracted from any photo or video you submit (known as 'biometric data').</p>	<ul style="list-style-type: none"><li>- Legal obligations</li><li>- Substantial public interest</li><li>- Consent (where required by law)</li></ul>
<p><b>Providing our services</b></p> <p>Whenever you apply for or use a Revolut product or service, we'll use your personal data to:</p> <ul style="list-style-type: none"><li>- decide whether or not to approve your application</li><li>- meet our contractual and legal obligations relating to any products or services you use</li></ul>	<ul style="list-style-type: none"><li>- Keeping to contracts and agreements between you and us</li><li>- Legitimate interests (we need to be efficient about how we meet our obligations and we want to provide you with good products and services)</li><li>- Legal obligations</li></ul>

What we use your personal data for	Our legal basis for using your personal data
<p>(for example, making payments into and out of your Revolut account, withdrawing cash or making payments with your Revolut card)</p> <ul style="list-style-type: none"> <li>- help you understand your spending behavior, how you use Revolut products and services, and to help you save money (for example, by providing you with product usage and spending insights)</li> <li>- recover debt and exercise other rights we have under any agreement with you</li> <li>- 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, analyze, assess and improve our services, and for training and quality control purposes</li> </ul> <p>Revolut &lt;18 is our account for children and teenagers aged between 6 and 17. We have a separate <a href="#">Revolut &lt;18 Privacy Notice</a> that explains how we process Revolut &lt;18 customers' personal data. The <a href="#">Revolut &lt;18 Privacy Notice</a> is specifically designed to be understood by children and teenagers.</p>	
<p><b>Protecting against fraud</b></p> <p>We use your personal data to check your address and 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.</p>	<ul style="list-style-type: none"> <li>- Legitimate interests (to develop and improve how we deal with financial crime and meet our legal responsibilities)</li> <li>- Substantial public interest</li> <li>- Consent (where required by law)</li> <li>- Legal obligations</li> </ul>
<p><b>Marketing and providing products and services that might interest you</b></p> <p>We use your personal data to do the following:</p>	<ul style="list-style-type: none"> <li>- Legitimate interests (to send direct marketing, ensure our direct marketing is relevant to your interests, develop our products and services, and to be efficient</li> </ul>



What we use your personal data for	Our legal basis for using your personal data
<ul style="list-style-type: none"> <li>- to personalize your in-app experience and marketing messages about our products and services so they're more relevant and interesting to you (where allowed by law). This may include analyzing how you use our products, services and your transactions</li> <li>- if you agree, provide you with information about our partners' promotions or offers which we think you might be interested in</li> <li>- if you agree, allow our partners and other organizations to provide you with information about their products or services</li> <li>- measure or understand the effectiveness of our marketing and advertising, and provide relevant advertising to you</li> <li>- ask your opinion about our products or services</li> </ul> <p>Remember, you can ask us to stop sending you marketing information by adjusting your marketing choices (the <b><i>How do you use my personal data for marketing?</i></b> section below explains how to do this).</p>	<p>about how we meet our legal and contractual duties)</p> <ul style="list-style-type: none"> <li>- Consent (where we're legally required to get your consent to send you direct marketing about our products or services, or partners' promotions or offers, or for you to receive marketing from other organizations)</li> </ul>
<p><b>To keep our services up and running</b></p> <p>We use your personal data to manage our website and 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.</p> <p>We also use your personal data to:</p> <ul style="list-style-type: none"> <li>- authenticate you as an authorized user of our services when necessary (for example, if you contact our customer support or social media teams)</li> <li>- allow you to take part in interactive features of our services</li> <li>- tell you about changes to our services</li> <li>- help keep our website and the Revolut app safe and secure</li> </ul>	<ul style="list-style-type: none"> <li>- Keeping to contracts and agreements between you and us</li> <li>- Legitimate interests (to be efficient about how we meet our obligations and keep to regulations that apply to us and to present content as effectively as possible for you)</li> <li>- Consent (where required by law)</li> </ul>
<p><b>Helping with social interactions</b></p> <p>We use your personal data to help with social interactions through our services, or</p>	<ul style="list-style-type: none"> <li>- Legitimate interests (to develop our products and services and to be efficient in meeting our obligations)</li> </ul>

What we use your personal data for	Our legal basis for using your personal data
<p>to add extra functions in order to provide a better experience.</p> <p>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.</p>	<ul style="list-style-type: none"> <li>- Consent (to access information held on your phone, for example, contacts in your contacts list, to track you when you have location services switched on)</li> </ul>
<p><b>Providing location-based services</b></p> <p>If you turn location services on in the Revolut app, we use your personal data to:</p> <ul style="list-style-type: none"> <li>- provide you with products and services</li> <li>- provide relevant advertising to you (for example, information about nearby merchants)</li> <li>- protect against fraud</li> </ul>	<ul style="list-style-type: none"> <li>- Keeping to contracts and agreements between you and us</li> <li>- Legitimate interests (to develop and market our products and keep to regulations that apply to us)</li> <li>- Consent (to track you when you have location services switched on)</li> </ul>
<p><b>Preparing anonymous statistical datasets</b></p> <p>We prepare anonymous statistical datasets about our customers' spending patterns:</p> <ul style="list-style-type: none"> <li>- for forecasting purposes</li> <li>- to understand how customers use Revolut</li> <li>- to comply with governmental requirements and requests</li> </ul> <p>These datasets may be shared internally or externally with others, including non-Revolut companies. We produce these reports using information about you and other customers. The information used and shared in this way is never personal data and you will never be identifiable from it. Anonymous statistical data cannot be linked back to you as an individual.</p> <p>For example, some countries have laws that require us to report spending statistics and how money enters or leaves each country. We'll provide anonymized statistical information that explains the broad categories of merchants that Revolut customers in that country spend their money with. We'll also provide information about how Revolut customers top up their accounts and transfer money. However, we won't provide any customer-level</p>	<ul style="list-style-type: none"> <li>- Legitimate interests (to conduct research and analysis, including to produce statistical research and reports)</li> <li>- Legal obligations</li> </ul>

What we use your personal data for	Our legal basis for using your personal data
<p>information. It will not be possible to identify any individual Revolut customer.</p>	
<p><b>Improving our products and services</b></p> <p>We use your personal data to help us develop and improve our current products and services. 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.</p> <p>This allows us to continue to provide products and services that our customers want to use.</p>	<ul style="list-style-type: none"> <li>- Legitimate interests (to understand how customers use our products so we can develop new products and improve the products we currently provide)</li> </ul>
<p><b>Meeting our legal obligations, enforcing our rights, protecting our business, and other legal uses</b></p> <p>We use your personal data:</p> <ul style="list-style-type: none"> <li>- to share it with other organizations (for example, government authorities, law enforcement authorities, tax authorities, fraud prevention agencies)</li> <li>- to recover debts from you (for example, where you hold a credit product with us or have a negative balance in your account)</li> <li>- if this is necessary to meet our legal or regulatory obligations</li> <li>- to identify and support vulnerable customers by letting you tell us if you need help or analyzing your behavior in the Revolut app, customer support communications and through transactions (for example, we will try to identify whether you are potentially vulnerable so we can provide you with enhanced support. Identifying and supporting vulnerable customers is a legal requirement for us in some countries)</li> <li>- to protect ourselves, including our rights, property, personnel or products</li> <li>- to help prevent and fight harmful or unlawful behaviour and spam communications (in line with Revolut's <a href="#">Community Standards</a>)</li> <li>- in connection with legal claims</li> </ul>	<ul style="list-style-type: none"> <li>- Legitimate interests (for example, to protect Revolut during a legal dispute)</li> <li>- Substantial public interest (if we process your sensitive personal data to keep to legal requirements that apply to us)</li> <li>- Legal obligations</li> </ul>

What we use your personal data for	Our legal basis for using your personal data
<p>- to help detect or prevent crime</p> <p>You can find out more in the <b><i>Do you share my personal data with anyone else?</i></b> section below.</p> <p>Sometimes, we're legally required to ask you to provide information about other people. For example, we might ask you to explain:</p> <ul style="list-style-type: none"> <li>- your relationship with a joint account holder or somebody who pays money into your Revolut account</li> <li>- how somebody got the money in the first place to pay it into your Revolut account</li> </ul>	

Sometimes, we help you to provide services to customers. For example, we provide payment processing services to you if you use our Revolut Pro product. Where this happens, you're responsible for deciding if we collect your customers' personal data and how we should process it on your behalf.

## 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 sometimes known as profiling. We do this for the efficient running of our services and to ensure decisions are fair, consistent and based on the right information.

Where we make an automated decision about you, you have the right to ask that it is manually reviewed by a person. You can find out more about this in the ***What are my rights?*** section below.

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

### **Determining credit eligibility:**

- assessing whether you are eligible to apply for a credit product

### **Approving credit applications:**

- credit and affordability checks to see whether we can accept your credit application
- setting credit limits

### **Monitoring credit agreements:**

- assessing how you're repaying any credit product you hold with us
- amending your credit limit
- terminating your credit agreement

### **Opening accounts:**

- KYC, anti-money laundering and sanctions checks

- identity and address checks

**Detecting fraud:**

- monitoring your account to detect fraud and financial crime

**Our legal basis is one or more of the following:**

- keeping to contracts and agreements between you and us
- legal obligations
- legitimate interests (to develop and improve how we deal with financial crime and meet our legal responsibilities)

## 7. Do you run credit checks on me?

We, and our lending partners, use credit reference agencies (or other providers of credit information in some countries) to run credit checks if you apply (or tell us you want to apply) for a credit product through Revolut.

If you give us access to other accounts you hold with other financial institutions, where you agree, we'll use available information to carry out credit checks on you.

We'll also share your personal data with credit reference agencies (or other providers of credit information) to:

- confirm details you have provided when you apply for products or services
- make an assessment about whether to accept your credit application
- determine an appropriate credit limit for you

When you enter into a credit agreement with us, we may continue sharing information with credit reference agencies or other providers of credit information (for example, information about your repayments and whether you repay in full or on time).

We may carry out additional credit checks on you from time to time to make sure that your financial wellbeing hasn't changed over the course of the year. If you are a vulnerable customer, we may contact you directly when you apply for a credit product. This is to make sure that we are offering you an appropriate credit product.

The personal data we share with, and receive from, credit reference agencies (or other providers of credit information) when you apply for or use a Revolut credit product will vary depending on the country you live in. We'll provide full details when you apply for a Revolut credit product.

For details of credit information providers we engage with in each country, please check out [this page](#).

**Our legal basis is one or more of the following:**

- consent (where we are required to collect your consent by law)
- legal obligations
- keeping to contracts and agreements between you and us (where you take out a credit product with us).

## 8. 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 to be contacted by mail, 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 personalize marketing messages about our products and services so they are more relevant and interesting to you (where allowed by law). This may include analyzing how you use our services and your transactions.

You can object to profiling for direct marketing purposes. You can also adjust your preferences or tell us you don't want to receive direct marketing. 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 personalized 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 organizations outside the Revolut group of companies for their marketing purposes without your permission. You can find out more in the ***Do you share my personal data with anyone else?*** section below.

**Our legal basis is:**

- consent (where we are required by law to collect your consent)
- legitimate interests (to send you marketing and to provide information relevant to your interests).

## 9. What are my rights?

Your right	What it means
<b>You have the right to be told how we use your personal data</b>	<p>We provide this privacy policy to explain how we use your personal data.</p> <p>If you ask, we'll provide a copy of the personal data we hold about you. We can't give you any personal data about other people, personal data which is linked to an ongoing criminal or fraud investigation, or personal data which is linked to settlement negotiations with you. We also won't provide you with any communication we've had with our legal advisers.</p>
<b>You have the right to ask us for a copy of your personal data</b>	<p>If you ask, we'll provide a copy of the personal data we hold about you. We can't give you any personal data about other people, personal data which is linked to an</p>

Your right	What it means
	ongoing criminal or fraud investigation, or personal data which is linked to settlement negotiations with you. We also won't provide you with any communication we've had with our legal advisers.
<b>You can ask us to correct your personal data if you think it's wrong</b>	You can have incomplete or inaccurate personal data corrected. Before we update your file, we may need to check the accuracy of the new personal data you have provided.
<b>You can ask us to delete your personal data</b>	<p>You can ask us to delete your personal data if:</p> <ul style="list-style-type: none"> <li>✓ there's no good reason for us to continue using it</li> <li>✓ you gave us consent (permission) to use your personal data and you have now withdrawn that consent</li> <li>✓ you have objected to us using your personal data</li> <li>✓ we have used your personal data unlawfully</li> <li>✓ the law requires us to delete your personal data</li> </ul> <p>Just to let you know, we may not be able to agree to your request. As a financial services provider, we must keep certain customer personal data even when you ask us to delete it (we've explained this in more detail below). If you've closed your Revolut account, we may not be able to delete your entire file because these regulatory and legal responsibilities take priority. We'll always let you know if we can't delete your personal data.</p>
<b>You can object to us processing your personal data for marketing purposes</b>	You can tell us to stop using your personal data, including profiling you, for marketing.
<b>You can object to us processing other personal data (if we're using it for legitimate interests)</b>	If our legal basis for using your personal data is 'legitimate interests' and you disagree with us using it, you can object. However, if there is an overriding reason why we need to use your personal data, we will not accept your request.



Your right	What it means
	If you object to us using personal data which we need to provide our services, we may need to close your account as we won't be able to provide the services.
<b>You can ask us to restrict how we use your personal data</b>	<p>You can ask us to suspend using your personal data if:</p> <ul style="list-style-type: none"> <li>✓ you want us to investigate whether it's accurate</li> <li>✓ our use of your personal data is unlawful but you don't want us to delete it</li> <li>✓ we no longer need your personal data, but you want us to continue holding it for you in connection with a legal claim</li> <li>✓ you have objected to us using your personal data (see above), but we need to check whether we have an overriding reason to use it.</li> </ul>
<b>You can ask us to transfer personal data to you or another company</b>	If we can, and are allowed to do so under regulatory requirements, we'll provide your personal data in a structured, commonly used, machine-readable format.
<b>You can withdraw your permission</b>	<p>If you've given us the consent we need to use your personal data, you can withdraw it at any time by changing your privacy settings in the Revolut app or sending an email to <a href="mailto:dpo@revolut.com">dpo@revolut.com</a>.</p> <p>(Please note, it will have been lawful for us to use the personal data up to the point you withdraw your permission.)</p>
<b>You can ask us to carry out a human review of an automated decision we make about you</b>	If we make an automated decision about you that significantly affects you, you can ask us to carry out a manual review of this decision.

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 we have a legitimate reason for not doing so or the right does not apply to the particular information we hold about you).

## 10. 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).



For security reasons, we can't deal with your request if we're not sure of your identity, so we may ask you for proof of ID.

If a third party exercises one of these rights on your behalf, we may need to ask for proof that they've been authorized to act on your behalf.

When you exercise one of your rights, or update your privacy settings in the Revolut app, it may take us up to one month to respond or implement your changes.

Revolut will usually not charge you a fee when you exercise your rights. However, we're allowed by law to charge a reasonable fee or refuse to act on your request if it is manifestly unfounded or excessive.

Revolut will not discriminate against you in any way because you exercise any rights conferred by this Privacy Policy.

If you are unhappy with how we have handled your personal information you can file a formal complaint by sending us an email to [complaints.us@revolut.com](mailto:complaints.us@revolut.com).

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

### ***Revolut group companies***

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

- provide you with the best service
- protect you, other customers and our systems from fraud or harmful behaviour
- facilitate you quickly signing up to use other Revolut products or services
- improve existing, or develop new, products or services
- send you information about Revolut products and services we think you'll be interested in hearing about.

### ***Other Revolut customers***

We'll ask you to let us sync your mobile phone contacts. This will help you to identify which of your trusted mobile phone contacts are Revolut customers. Your 'trusted contacts' will also be able to see if you're a Revolut customer through our in-app discoverability settings.

In-app discoverability gives you access to Revolut features like requesting money from your friends, splitting bills, Group Pockets, paying other Revolut customers or chatting to your 'trusted contacts'.

We use technological safeguards to ensure a 'trusted contact' is somebody you already know and who knows you (for example, you have each other saved in each other's mobile phone contacts lists or have already received or given money through a peer-to-peer payment with them).

Both you and your trusted contact must have synced your mobile phone contacts lists with Revolut to be viewable to each other in the Revolut app.

If you have synced your mobile phone contacts, we only show basic details about you in the Revolut app to your trusted contacts who are also Revolut customers (for example, your name (as saved in your friend's contacts list), mobile phone number, Revtag, Revolut membership plan and Revolut profile photo (if you have one)).

You can, of course, choose not to sync your contacts list with Revolut. This means that you won't be able to identify which of your mobile phone contacts are Revolut customers.

You can also change your discoverability 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 input your Revtag, they will be able to see your name and profile photo (if you have one). You can turn off being discoverable by your Revtag through the privacy settings in the Revolut app.

### ***People or companies that you transfer money to***

Where you make a payment from your Revolut account, we'll provide the recipient with your details alongside your payment (for example, your name and IBAN). This is because, like all payment institutions, we're required by law to include certain information with payments.

### ***People or companies that transfer money to you***

When you receive a payment to your Revolut account, we'll provide the payer with your details (for example, your name and IBAN). This is necessary to confirm that the payment has been made to the correct account.

### ***Suppliers***

The table below explains which suppliers we normally share your personal data with:

Type of supplier	Why we share your personal data
Suppliers who provide us with IT, payment and delivery services	To help us provide our services to you
Our banking and financial services partners and payments networks, including Visa and Mastercard	To help us provide our services to you. This includes banking and lending partners, banking intermediaries and international payment service providers
Identity verification and KYC service providers	To help us verify your identity so we can provide services to you
Card manufacturing, personalization and delivery companies	To create and deliver your personalized Revolut card
Analytics providers and search information providers	To help us improve our website or app
Customer-service providers, survey providers and developers	To help us to provide our services to you
Communications services providers	To help us send you emails, push notifications and text messages
Debt collection agencies	To manage and recover debts that you owe or may end up owing (including if you have a Revolut credit product)

### ***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, as well as to make sure you get any reward 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 right award or cashback).

We'll only share your personal data in this way if you've made a qualifying purchase, asked for the relevant service or if it's provided as part of our membership plans.

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

### ***Credit reporting agencies***

As set out in the ***Do you run credit checks on me?*** section above, if you apply for a credit product, we'll share your personal data with credit reference agencies to check whether you are likely to make repayments when due.

### ***Other financial institutions and Revolut customers***

We may share your personal data with other financial institutions, or Revolut customers, if you ask us to.

We may also share your personal data with other financial institutions, or Revolut customers, where you do not ask us to.

### ***Joint account holders***

If you have a joint account with us, we will share account and transaction information between joint account holders. For example, your co-account holder will see any transactions you make from your joint account.

### ***Other third parties***

We may share your personal data with other third parties where necessary to facilitate you receiving 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, companies and fraud prevention agencies to check your identity, investigate, or protect against suspected fraud, keep to tax laws, anti-money laundering laws, or any other laws and confirm that you're eligible to use our products and services.

If fraud is detected, you could be refused certain services by Revolut or other companies.

We may also need to share your personal data with other third party organizations or 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)
- in connection with legal claims.

### ***Social media and advertising companies***

When we use social media for marketing purposes, your personal data (limited to only your name, email address and app events) 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:

- use your personal data to send our adverts to you, because we think that you might be interested in a new Revolut product or service
- not send you our adverts, because the marketing relates to a service that you already use

- send our adverts 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 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 we share it with is only allowed to use that hashed personal data in the ways described above.

Our legal basis is:

- legitimate interests (to ensure Revolut's advertising is as effective as possible)

You can contact us at any time, either through the Revolut app or by emailing [dpo@revolut.com](mailto:dpo@revolut.com), if you don't want us to share your personal data for advertising purposes. You can also use the privacy settings in the Revolut app to opt out from having your personal data shared in this way.

Remember you can also manage your marketing preferences directly with any social media provider that you have an account with.

### ***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 authorize 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 authorized to act on your behalf.

## **CONSUMER PRIVACY NOTICE**

The [Consumer Privacy Notice](#) details our privacy and security practices regarding our relationship with you and provides instructions on how to limit the sharing of non-public personal information.

## 12. Will my personal data go outside the United States?

We may transfer your personal information outside the US to provide our services. We may store your personal information outside of the United States or use affiliates or service providers located outside of the United States to offer you our products and services.

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.

We may share your personal information with credit reporting agencies and fraud-prevention agencies outside the US.

We will take all reasonable steps to make sure that your personal information is handled securely and in line with this privacy policy and data protection laws.

If you would like more information, please contact us through the Revolut app or by sending an email to [dpo@revolut.com](mailto:dpo@revolut.com).

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

We recognize 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 organizational and technical measures to:

- maintain the confidentiality, availability and integrity of your personal data
- make sure your personal data is not improperly used or disclosed

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

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

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

While we take all reasonable steps to ensure that your personal data will be kept secure from unauthorized 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.

If you use a password, PIN or generated authorization code or prompt to use the Revolut app our website or other services, you will need to keep it confidential. Please do not share it with anyone. Revolut will never ask you for this credential.

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.

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

We will keep your personal data:

- for as long as necessary to achieve the original purpose we collected it for
- in line with relevant laws

We are required to keep certain personal data for specified time periods by KYC, and anti-money laundering laws. Revolut has detailed policies and procedures in place to ensure we comply with these requirements.

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

## 15. 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 policy and, if appropriate, let you know by email, through the Revolut app or through our website.

## 16. Do you use cookies?

We use cookies to analyze 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 Revolut app.

## 17. Children's privacy

### ***About Revolut <18***

Revolut <18 is a sub-account of your Revolut personal account for your child(ren). Revolut <18 is a great way for your child(ren) to pay for things and learn how to use money.

### ***How do we protect the privacy of children's data?***

In order to protect the privacy of data for both the parent(s) and child(ren), we adopted and followed the guidelines and rules laid down by the Children's Online Privacy Protection Act ('COPPA'). COPPA requires us to notify parents or legal guardians and get their verifiable parental consent before we collect, use, or disclose personal information of children under the age of 13.

We do not knowingly collect "personal information," as defined below under COPPA, directly from users under the age of 13, except as described below. If the primary account holder creates a sub-account for a child under the age of 13, only the primary account holder (i.e., the parent or legal guardian), provides information to us necessary to establish the sub-account for the child. Revolut will not collect, use, or disclose any personal information from the child if the parent does not provide consent.

### **PERSONAL INFORMATION UNDER COPPA**

Personal information means individually identifiable information about an individual collected online, including— (A) a first and last name; (B) a home or other physical address including street name and name of a city or town; (C) an e-mail address; (D) a telephone number; (E) a Social Security number; (F) any other identifier that the Federal Trade Commission determines permits the physical or online contacting of a specific individual; or (G) information concerning the child or the parents of that child that the website collects online from the child and combines with an identifier described in this paragraph.

### ***What information are we collecting from you about your child(ren)?***

We may collect the following information:

- the child's name, address and date of birth;
- email address, phone number and details of the device they use (for example, the child's phone number);
- your username, password and other registration information;
- identification documents (for example, the child's passport or driving license number (if applicable)), copies of any documents you have provided for identification purposes, a



personal description and photograph of the child, and any other information you provide to prove they are eligible to use our services; and

- records of our discussions if you contact us or we contact you.

***What information are we collecting directly from your child(ren) if they are age 13+?***

If your child is age 13+, we may collect the following information:

- the child's name, address and date of birth;
- email address, phone number and details of the device they use (for example, the child's phone number);
- username and PIN/Passcode;
- synced phone contacts;
- geolocation and IP address; and
- photo (if a profile photo is uploaded)

***How do we use the collected information of your child(ren)?***

We may use your child(ren)'s data so we can do the following:

- send them a welcome pack and information like tips on how to use their account to save money;
- make sure it is the child using the account;
- make sure we give them important news and other information they need to know about the account;
- provide them with our full set of features, subject to applicable laws and Revolut's age-based restrictions;
- protect their account by making sure they are at the same place as their card is being used;
- reply to the parent, legal guardian, or child when they contact us, or answer any questions they may ask us;
- find out what the child likes and doesn't like about Revolut <18 so we can make it better for them; and
- make sure we don't break the law. To do this, we'll share information with the police or other important people when we need to. They will investigate when something has gone wrong and make sure we're doing everything right to protect them.

***Are there any exceptions to collecting information from my child(ren) without verifiable parental consent?***

There are some limited exceptions that allow us to collect information without verifiable parental consent, such as:

- collecting a child's contact information solely to directly respond to the child's request on a one-time basis. We will not use that information to re-contact the child for any other purpose;
- collecting a child's contact information and the contact information of their parent or legal guardian to directly respond more than once to a specific request from the child. We will not use the child's personal information to re-contact the child for any other purpose;
- to protect the security and integrity of our app;

- to respond to judicial process or provide information to law enforcement;
- when providing support for the internal operations of our app which include: maintaining and analyzing the functioning of our app; performing network communications; authenticating users; personalizing content on the app; serving contextual advertising or capping the frequency of advertising; protecting the security or integrity of the user;
- to ensure legal and regulatory compliance.

### ***How do I exercise my right to review the information provided by my child(ren)?***

Upon written request, COPPA requires us to provide you with a description of the specific types of personal information collected from your child(ren) such as name, address, telephone number, email address, hobbies, and extracurricular activities. To make sure you (i.e., the parent or legal guardian) are actually making this request, we may ask for additional information before disclosing the personal information collected from your child(ren).

You also have the right to stop us from future use or future collection of personal information from your child(ren). You may ask us to delete the child's personal information. See section on How long we will keep your child(ren)'s personal information.

### ***How long will we keep your child(ren)'s personal information?***

We need to keep your child(ren)'s data while their Revolut <18 account is active.

We may need to keep your data for longer if the law says we must. So even if you ask us to destroy your data, we may not be able to do that right away.

If you close your account, we'll keep your data for up to six years. We may need to keep it even longer, for example, if it is needed for regulatory or legal reasons.

### ***What to do if you have any questions or want to know more?***

Get in touch! If you have any questions about your child(ren)'s data, email us at dpo-revolut\_u18@revolut.com.

## **18. Notice to California Residents**

The California Consumer Privacy Act, as amended by the California Privacy Rights Act of 2020 ("CCPA") requires that we provide you with a privacy policy of our online and offline information practices and your rights under this law regarding your personal information. This section of the privacy policy is only applicable to California residents. If you are not a California resident, this section does not apply to you.

### **Notice of Collection of Personal Information**

We currently collect, share, disclose, and use your personal information and in the 12 months prior to the last updated date of this Privacy Policy, have collected, shared, disclosed, and used the following categories of personal information:

- Identifiers (name, postal address, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number)
- Unique personal identifiers (device identifiers, cookies, beacons, pixel tags, mobile ad identifiers, or other similar technology)



- Telephone Number
- Signature
- Bank Account Number
- Credit Card Number or Debit Account Number
- Other financial information, including personal or business credit history, payment behavior, tax identification number
- Biometric data, such as facial recognition for FaceID logins
- Internet or other electronic network activity information (browsing history, search history, and information regarding your interaction with our website or application and/or advertisements
- Geolocation data
- Audio or similar information, such as recordings for phone calls
- Professional or employment-related history
- Characteristics of protected classifications under California or federal law
- Inferences drawn from the above information to create a profile about you reflecting your preferences, characteristics, psychological trends, behaviors, and abilities

We collect personal information directly from California residents, credit reporting agencies, or our third party service providers. We do not collect all categories of personal information from each source.

The table below explains what personal data we collect, share, disclose, and use and provide further explanation on the above categories:

<u>Type of personal data</u>	<u>Details</u>
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>✓ register, or approve a registration for, a child to use the Revolut &lt;18 app</li> <li>✓ open an account or use any of our services</li> <li>✓ give us access to your other financial accounts</li> </ul>

Type of personal data	Details
	<p>✓ take part in online discussions or promotions</p> <p>✓ speak with a member of our social media or customer support teams (either on the phone or through the Revolut app)</p> <p>✓ enter a competition, sweepstakes, or share information with us on social media</p> <p>✓ contact us for other reasons</p> <p>We will collect the following information:</p> <p>✓ your name, address, social security number, and date of birth</p> <p>✓ your email address, phone number and details of the device you use (for example, your phone, computer or tablet)</p> <p>✓ 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)</p> <p>✓ your registration information</p> <p>✓ details of your bank account, including the account number, sort code and ABA routing number or SWIFT code</p> <p>✓ 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)</p> <p>✓ copies of your identification documents (for example, your passport or driver's license) and any other information you provide to prove you are eligible to use our services</p>

Type of personal data	Details
	<p>✓ your country of residence, tax residency information, and tax identification number</p> <p>✓ information you provide when you apply for credit, including details about your, or your spouse's, income and financial obligations</p> <p>✓ information you provide when you sign up for wealth and trading products, including details about your employment and salary</p> <p>✓ information you provide when you register or approve your children to use Revolut &lt;18</p> <p>✓ records of our discussions, if you contact us or we contact you (including records of phone calls)</p> <p>✓ 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 (where required as part of our Know-Your-Customer (KYC) checks, to authenticate you as an authorized user of our services, or to detect and prevent fraud 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 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 laws and other laws to assist with fraud monitoring</p> <p>If you give us personal data about other people (such as a joint account holder, your spouse or family), or you ask us to share their personal data with third parties, you confirm that you have brought this policy to their attention beforehand.</p>

Type of personal data	Details
<p><b>Information collected from your use of our products and services</b></p>	<p>Whenever you use our website or the Revolut app, we collect the following information:</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 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, the MAC address of the device's wireless network interface, or the mobile phone number used by the device), mobile network information, your mobile operating system and the type of mobile browser you use</li> <li>✓ 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</li> <li>✓ 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 device used to arrange the payment and the payment method used</li> </ul>

Type of personal data	Details
	<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>
<p><b>Information about your location</b></p>	<p>If you turn location services on in the Revolut app, we track your location using GPS technology.</p>
<p><b>Information from others</b></p>	<p>We collect personal data from third parties or other people, such as credit reference agencies, financial or credit institutions, official registers and databases, as well as joint account holders, fraud prevention agencies and partners who help us to provide our services.</p> <p>This includes your credit record, information about late payments, information to help us check your identity, information about your spouse and family (if applicable in the context of an application for credit that you make) and information relating to your transactions.</p> <p>When you ask us to, we'll also collect personal data from accounts you hold with third party financial institutions (when you create a linked account by activating Open Banking in the Revolut app). If you apply for our credit products, when you allow us, we may use this information for credit checks.</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>
<p><b>Information from social media</b></p>	<p>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</p>

Type of personal data	Details
	when we conduct general searches on you (for example, to comply with our anti-money laundering or sanctions screening obligations).
<b>Information from publicly available sources</b>	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.

## **How Do We Use Your Personal Information?**

<b><u>What we use your personal data for</u></b>	<b><u>Our legal basis for using your personal data</u></b>
<p><b>Checking your identity</b></p> <p>Whenever you sign up with Revolut, we'll use your personal data to check your identity or the identity of joint account holders (as part of our KYC process).</p> <p>This may include facial scan data extracted from any photo or video you submit (known as 'biometric data').</p>	<ul style="list-style-type: none"> <li>- Legal obligations</li> <li>- Substantial public interest</li> <li>- Consent (where required by law)</li> </ul>
<p><b>Providing our services</b></p> <p>Whenever you apply for or use a Revolut product or service, we'll use your personal data to:</p> <ul style="list-style-type: none"> <li>- decide whether or not to approve your application</li> <li>- meet our contractual and legal obligations relating to any products or services you use (for example, making payments into and out of your Revolut account, withdrawing cash or making payments with your Revolut card)</li> <li>- help you understand your spending behavior, how you use Revolut products and services, and to help you save money (for example, by providing you with product usage and spending insights)</li> </ul>	<ul style="list-style-type: none"> <li>- Keeping to contracts and agreements between you and us</li> <li>- Legitimate interests (we need to be efficient about how we meet our obligations and we want to provide you with good products and services)</li> <li>- Legal obligations</li> </ul>

What we use your personal data for	Our legal basis for using your personal data
<ul style="list-style-type: none"> <li>- recover debt and exercise other rights we have under any agreement with you</li> <li>- 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, analyze, assess and improve our services, and for training and quality control purposes</li> </ul> <p>Revolut &lt;18 is our account for children and teenagers aged between 6 and 17. We have a separate <a href="#">Revolut &lt;18 Privacy Notice</a> that explains how we process Revolut &lt;18 customers' personal data. The Revolut &lt;18 Privacy Notice is specifically designed to be understood by children and teenagers.</p>	
<p><b>Protecting against fraud</b></p> <p>We use your personal data to check your address and 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.</p>	<ul style="list-style-type: none"> <li>- Legitimate interests (to develop and improve how we deal with financial crime and meet our legal responsibilities)</li> <li>- Substantial public interest</li> <li>- Consent (where required by law)</li> <li>- Legal obligations</li> </ul>
<p><b>Marketing and providing products and services that might interest you</b></p> <p>We use your personal data to do the following:</p> <ul style="list-style-type: none"> <li>- to personalize your in-app experience and marketing messages about our products and services so they're more relevant and interesting to you (where allowed by law). This may include analyzing how you use our products, services and your transactions.</li> <li>- if you agree, provide you with information about our partners' promotions or offers which we think you might be interested in</li> </ul>	<ul style="list-style-type: none"> <li>- Legitimate interests (to send direct marketing, ensure our direct marketing is relevant to your interests, develop our products and services, and to be efficient about how we meet our legal and contractual duties)</li> <li>- Consent (where we're legally required to get your consent to send you direct marketing about our products or services, or partners' promotions or offers, or for you to receive marketing from other organizations)</li> </ul>

What we use your personal data for	Our legal basis for using your personal data
<ul style="list-style-type: none"> <li>- if you agree, allow our partners and other organizations to provide you with information about their products or services</li> <li>- measure or understand the effectiveness of our marketing and advertising, and provide relevant advertising to you</li> <li>- ask your opinion about our products or services</li> </ul> <p>Remember, you can ask us to stop sending you marketing information by adjusting your marketing choices (the How do you use my personal data for marketing? section below explains how to do this).</p>	
<p><b>To keep our services up and running</b></p> <p>We use your personal data to manage our website and 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.</p> <p>We also use your personal data to:</p> <ul style="list-style-type: none"> <li>- authenticate you as an authorized user of our services when necessary (for example, verify your identity if you contact our customer support or social media teams)</li> <li>- allow you to take part in interactive features of our services</li> <li>- tell you about changes to our services</li> <li>- help keep our website and the Revolut app safe and secure</li> </ul>	<ul style="list-style-type: none"> <li>- Keeping to contracts and agreements between you and us</li> <li>- Legitimate interests (to be efficient about how we meet our obligations and keep to regulations that apply to us and to present content as effectively as possible for you)</li> <li>- Consent (where required by law)</li> </ul>
<p><b>Helping with social interactions</b></p>	<ul style="list-style-type: none"> <li>- Legitimate interests (to develop our products and services and to be efficient in</li> </ul>



What we use your personal data for	Our legal basis for using your personal data
<p>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.</p> <p>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.</p>	<p>meeting our obligations)</p> <ul style="list-style-type: none"> <li>- Consent (to access information held on your phone, for example, contacts in your contacts list, to track you when you have location services switched on)</li> </ul>
<p><b>Providing location-based services</b></p> <p>If you turn location services on in the Revolut app, we use your personal data to:</p> <ul style="list-style-type: none"> <li>- provide you with products and services</li> <li>- provide relevant advertising to you (for example, information about nearby merchants)</li> <li>- protect against fraud</li> </ul>	<ul style="list-style-type: none"> <li>- Keeping to contracts and agreements between you and us</li> <li>- Legitimate interests (to develop and market our products and keep to regulations that apply to us)</li> <li>- Consent (to track you when you have location services switched on)</li> </ul>
<p><b>Preparing anonymous statistical datasets</b></p> <p>We prepare anonymous statistical datasets about our customers' spending patterns:</p> <ul style="list-style-type: none"> <li>- for forecasting purposes</li> <li>- to understand how customers use Revolut</li> <li>- to comply with governmental requirements and requests</li> </ul> <p>These datasets may be shared internally or externally with others, including non-Revolut companies. We produce these reports using information about you and other customers. The information used and shared in this way is never personal data and you will never be identifiable from it. Anonymous statistical data cannot be linked back to you as an individual.</p> <p>For example, some countries have laws that require us to report spending statistics and how money enters or leaves each country. We'll provide anonymised statistical information that explains the broad categories of merchants that Revolut customers in that country spend their money with. We'll also provide information</p>	<ul style="list-style-type: none"> <li>- Legitimate interests (to conduct research and analysis, including to produce statistical research and reports)</li> <li>- Legal obligations</li> </ul>

What we use your personal data for	Our legal basis for using your personal data
<p>about how Revolut customers top up their accounts and transfer money. However, we won't provide any customer-level information. It will not be possible to identify any individual Revolut customer.</p>	
<p><b>Improving our products and services</b></p> <p>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. 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.</p>	<ul style="list-style-type: none"> <li>- Legitimate interests (to understand how customers use our products so we can develop new products and improve the products we currently provide)</li> </ul>
<p><b>Meeting our legal obligations, enforcing our rights, protecting our business, and other legal uses</b></p> <p>We use your personal data:</p> <ul style="list-style-type: none"> <li>- to share it with other organizations (for example, government authorities, law enforcement authorities, tax authorities, fraud prevention agencies)</li> <li>- to recover debts from you (for example, where you hold a credit product with us or have a negative balance in your account)</li> <li>- if this is necessary to meet our legal or regulatory obligations</li> <li>- to identify and support vulnerable customers by letting you tell us if you need help or analyzing your behavior in the Revolut app, customer support communications and through transactions (for example, we will try to identify whether you are potentially vulnerable so we can provide you with enhanced support. Identifying and supporting vulnerable customers is a legal requirement for us in some countries)</li> </ul>	<ul style="list-style-type: none"> <li>- Legitimate interests (for example, to protect Revolut during a legal dispute)</li> <li>- Substantial public interest (if we process your sensitive personal data to keep to legal requirements that apply to us)</li> <li>- Legal obligations</li> </ul>

What we use your personal data for	Our legal basis for using your personal data
<ul style="list-style-type: none"> <li>- to protect ourselves, including our rights, property, personnel or products</li> <li>- to help prevent and fight harmful or unlawful behaviour and spam communications (in line with Revolut's <a href="#">Community Standards</a>)</li> <li>- in connection with legal claims</li> <li>- to help detect or prevent crime</li> </ul> <p>You can find out more in the Do you share my personal data with anyone else? section below.</p> <p>Sometimes, we're legally required to ask you to provide information about other people. For example, we might ask you to explain:</p> <ul style="list-style-type: none"> <li>- your relationship with a joint account holder or somebody who pays money into your Revolut account</li> <li>- how somebody got the money in the first place to pay it into your Revolut account</li> </ul>	

Sometimes, we help you to provide services to customers. For example, we provide payment processing services to you if you use our Revolut Pro product. Where this happens, you're responsible for deciding if we collect your customers' personal data and how we should process it on your behalf.

### **Do You Share My Personal Information With Anyone Else?**

We do not sell and have not sold in the preceding 12 months, personal information to third parties.

#### *Revolut group companies*

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

- provide you with the best service
- send you information about Revolut products and services we think you'll be interested in hearing about
- protect you, other customers and our systems from fraud or harmful behaviour

- facilitate you quickly signing up to use other Revolut products or services
- improve existing, or develop new, products or services

### *Other Revolut customers*

We'll ask you to let us sync your mobile phone contacts. This will help you to identify which of your trusted mobile phone contacts are Revolut customers. Your 'trusted contacts' will also be able to see if you're a Revolut customer through our in-app discoverability settings.

In-app discoverability gives you access to Revolut features like requesting money from your friends, splitting bills, group Vaults, paying other Revolut customers or chatting to your 'trusted contacts'.

We use technological safeguards to ensure a 'trusted contact' is somebody you already know and who knows you (for example, you have each other saved in each other's mobile phone contacts lists or have already received or given money through a peer-to-peer payment with them).

Both you and your trusted contact must have synced your mobile phone contacts lists with Revolut to be viewable to each other in the Revolut app.

If you have synced your mobile phone contacts, we only show basic details about you in the Revolut app to your trusted contacts who are also Revolut customers (for example, your name (as saved in your friend's contacts list), mobile phone number, Revtag, Revolut membership plan, and Revolut profile photo (if you have one)).

You can, of course, choose not to sync your contacts list with Revolut. This means that you won't be able to identify which of your mobile phone contacts are Revolut customers.

You can also change your discoverability 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 input your Revtag, they will be able to see your name and profile photo (if you have one). You can turn off being discoverable by your Revtag through the privacy settings in the Revolut app.

### *People or companies that you transfer money to*

Where you make a payment from your Revolut account, we'll provide the recipient with your details alongside your payment (for example, your name and IBAN). This is because, like all payment institutions, we're required by law to include certain information with payments.

### *People or companies that transfer money to you*

When you receive a payment to your Revolut account, we'll provide the payer with your details. This is necessary to confirm that the payment has been made to the correct account.

## Suppliers

The table below explains which suppliers we normally share your personal data with:

<b><u>Type of supplier</u></b>	<b><u>Why we share your personal data</u></b>
Suppliers who provide us with IT, payment and delivery services	To help us provide our services to you
Our banking and financial services partners and payments networks, including Visa and Mastercard	To help us provide our services to you. This includes banking and lending partners, banking intermediaries and international payment service providers
Identity verification and KYC service providers	To help us verify your identity so we can provide services to you
Card manufacturing, personalisation and delivery companies	To create and deliver your personalised Revolut card
Analytics providers and search information providers	To help us improve our website or app
Customer-service providers, survey providers and developers	To help us to provide our services to you
Communications services providers	To help us send you emails, push notifications and text messages
Debt collection agencies	To manage and recover debts that you owe or may end up owing (including if you have a Revolut credit product)

## 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, as well as to make sure you get any reward 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 right award or cashback).

We'll only share your personal data in this way if you've made a qualifying purchase, asked for the relevant service or if it's provided as part of our membership plans.

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

## Credit reporting agencies

As set out in the Do you run credit checks on me? section above, if you apply for a credit product, we'll share your personal data with credit reference agencies to check whether you are likely to make repayments when due.

## Other financial institutions and Revolut customers

We may share your personal data with other financial institutions, or Revolut customers, if you ask us to. We may also share your personal data with other financial institutions, or Revolut

customers, where you do not ask us to.

#### *Joint account holders*

If you have a joint account with us, we will share account and transaction information between joint account holders. For example, your co-account holder will see any transactions you make from your joint account.

#### *Other third parties*

We may share your personal data with other third parties where necessary to facilitate you receiving 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, companies, and fraud prevention agencies to check your identity, investigate, or protect against suspected fraud, keep to tax laws, anti-money laundering laws, or any other laws and confirm that you're eligible to use our products and services.

If fraud is detected, you could be refused certain services by Revolut or other companies.

We may also need to share your personal data with other third party organizations or 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)
- in connection with legal claims.

#### *Social media and advertising companies*

When we use social media for marketing purposes, your personal data (limited to only your name, email address, and app events) 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:

- use your personal data to send our adverts to you, because we think that you might be interested in a new Revolut product or service
- not send you our adverts, because the marketing relates to a service that you already use
- send our adverts 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 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 partners we share it with is only allowed to use that hashed personal data in the ways described above.

Our legal basis is:

- legitimate interests (to ensure Revolut's advertising is as effective as possible)

You can contact us at any time, either through the Revolut app or by emailing [dpo@revolut.com](mailto:dpo@revolut.com), if you don't want us to share your personal data for advertising purposes. You can also use the privacy settings in the Revolut app to opt out from having your personal data shared in this way.

Remember you can also manage your marketing preferences directly with any social media provider that you have an account with.

#### *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 authorize 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 authorized to act on your behalf.

We knowingly share the personal information of consumers under 16 years old. Revolut <18 is our account for children and teenagers aged between 6 and 17. We have a separate Data Privacy Statement for Revolut <18 that explains how we process Revolut <18 customers' personal data. The Data Privacy Statement is specifically designed to be understood by children and teenagers.

#### **How Long Will You Keep My Personal Data For?**

We will keep your personal data:

- for as long as necessary to achieve the original purpose we collected it for
- in line with relevant laws

We're required to keep certain personal data for specified time periods by KYC, and anti-money laundering laws. Revolut has detailed policies and procedures in place to ensure we comply with these requirements.

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

#### **What Are My Rights?**

If you are a California resident, you have the following rights to your personal information:



- The right to know what personal information we have collected about you, the categories of personal information we have collected, the categories of sources that the personal information has been collected from, our business or commercial purposes for collecting that personal information, whether we sell or share your personal information (if applicable), the categories of third parties we disclose your personal information to, and the specific pieces of personal information the business has collected about you.
- The right to delete personal information that we collected from you, subject to certain regulatory and legal obligations.
- The right to correct inaccurate personal information that we have collected from you.
- If we sell or share your personal information, the right to opt out of the sale or sharing of your personal information.
- If we use or disclose your sensitive personal information for purposes other than what is allowed by the CCPA, the right to limit our use or disclosure of your sensitive personal information.
- The right to not receive discriminatory treatment by us for exercising your rights under the CCPA.

### **How to Exercise my Rights to Know, Delete, and/or Correct?**

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).

For security reasons, we can't deal with your request if we're not sure of your identity, so we may ask you for proof of ID. If we cannot verify your identity through your ID, you may be requested to contact us with further instructions to assist us in responding to your request.

If a third party exercises one of these rights on your behalf, we may need to ask for proof that they've been authorized to act on your behalf.

When you exercise one of your rights, or update your privacy settings in the Revolut app, it may take us up to one month to respond or implement your changes.

Revolut will usually not charge you a fee when you exercise your rights. However, we're allowed by law to charge a reasonable fee or refuse to act on your request if it is manifestly unfounded or excessive.

Revolut will not discriminate against you in any way because you exercise any rights conferred by this Privacy Policy.

If you are unhappy with how we have handled your personal information you can file a formal complaint by sending us an email to [complaints.us@revolut.com](mailto:complaints.us@revolut.com).

### **Right to Opt Out Of Sale or Sharing of Personal Information**

If you are a California resident, California law provides you with the right to opt out of the sharing of your personal information. You may submit a request to opt out of sale or sharing of your personal information by clicking on our website ([www.revolut.com/en-US/](http://www.revolut.com/en-US/)) footer link "[Do Not Sell or Share My Personal Information](#)" or contacting us at [dpo@revolut.com](mailto:dpo@revolut.com).

### **Right to Limit the Use of My Sensitive Personal Information**

If you are a California resident, California law provides you with the right to limit the use of your sensitive personal information. You may submit a request to limit the use of your sensitive



personal information by clicking on our website ([www.revolut.com/en-US/](https://www.revolut.com/en-US/)) footer link "Limit the Use of My Sensitive Personal Information" or contacting us at [dpo@revolut.com](mailto:dpo@revolut.com).

## 19. Accessibility

We are committed to ensuring this Privacy Policy is accessible to individuals with disabilities. If you wish to access this Privacy Policy in an alternative method, please contact us at [dpo@revolut.com](mailto:dpo@revolut.com).