

# The basics

## 1. About us

We are Revolut Payments Australia Pty Ltd (ACN 634 823 180), AFSL and Australian Credit Licence Number 517589. Our registered office is at Level 28, 161 Castlereagh Street, Sydney, NSW, 2000 Australia.

We are committed to protecting and respecting your privacy in accordance with our obligations under the Privacy Act 1988 and the Australian Privacy Principles (the "APPs").

We will strive 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.

This privacy policy (the "Privacy Policy") contains important information, including how you may complain about any breach of the APPs or a registered APP code and how we will deal with such a complaint.

This Privacy Policy explains what personal information we collect, how we use it, and your rights if you want to change how we use your personal information. You must also read our [Electronic Verification Consent Terms](#) for information on verification using electronic sources and verification using Credit Reporting Agencies. If you have applied for our Credit Product, this Privacy Policy is read together with our [Credit Reporting Policy](#), which explains how we manage your credit-related personal information.

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

## Your information

## 2. What information do you collect and hold 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. The kinds of personal information we collect and how we collect it are set out below.

### **Sensitive information**

We may collect your sensitive information after we ask for your consent to collect it. The kinds of sensitive information we may collect are:

- biometric templates (such as a photo of your face for identity verification purposes or any photos you upload to our applications);
- racial or nationality information; and
- health information if you hold our Credit Product and request a hardship arrangement.

### **How do we collect your information?**

We collect information about you when you:

- fill in application forms for any of our products or services;
- correspond with us;
- register to use the Revolut app;
- open an account or use any of our services;
- if applying for our Credit Product, submit credit assessment documents;
- take part in online discussions, surveys or promotions;
- communicate with a member of our customer support team (either on the phone or through the Revolut app);
- enter a competition; or
- contact us for any other reasons.

### **What kinds of personal information do you collect?**

The kinds of personal information we collect are:

- your name, address, and date of birth;
- your email address, phone number and details of the device you use (for example, your phone, computer or tablet);
- if applying for a Revolut <18 account, your gender and relationship to the Revolut account holder;
- if applying for our Business product, your employment position in respect of your business;
- your username, password and other registration information;
- details of your bank account, including the account number, BSB and IBAN;
- details of your debit cards and credit cards if you use these to top-up your Revolut account, including the card number, expiry date and CVC (the last three digits of the number on the back of the card);
- identification documents (for example, your passport or driving licence), copies of any documents you have provided for identification purposes, a personal description (if you

provide one), and any other information you provide to prove you are eligible to use our services.

- if you contact us or we contact you, records of our discussions;
- if applying for our Trading Product or Credit Product, details of your employment, earnings and wealth (including income, assets, expenditure and liabilities); and
- if applying for our Credit Product, credit-related personal information (see our [Credit Reporting Policy](#) for information on how we manage your credit-related personal information).

### **Information collected from your device**

Whenever you use our website or the Revolut app or the Revolut <18 app, we collect the following information:

- technical information, including the internet protocol (IP) address used to connect your computer to the internet, your log-in information, the browser type and version, the time-zone setting, the operating system and platform, the type of device you use, a unique device identifier (for example, your device's IMEI number, 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, the type of mobile browser you use and so on;
- information about your visit to our website or our app, including the links you have clicked on, through and from our site (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;
- information about transactions (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, IP address of sender and receiver, sender's and receiver's name and registration information, messages sent or received with the payment, details of device used to arrange the payment and the payment method used; and
- information stored on your device, including if you give us access to contact information from your address book, log-in information, photos, videos or other digital content, check-ins (sometimes, we call this content information). The Revolut app will regularly collect this information in order to stay up to date.

### **Information collected about your location**

If you have location services in the Revolut app switched on, we track your location using GPS technology and your IP address.

### **Information from others**

Although we usually collect information directly from you, we may also collect information from sources other than you, including:

- third parties, such as fraud-prevention agencies and partners who help us to provide our services;

- people acting on your behalf, if you have applied for our Business Product or Revolut <18 (if someone is acting on your behalf, we will confirm their authority for our Business Product or obtain your consent if you are 15 years or older for Revolut <18 via your acceptance of the [Revolut <18 Terms](#));
- your employer or a credit reporting body, if you have applied for our Credit Product (see our [Credit Reporting Policy](#)).

### **Information from social media**

If you allow us to, we will collect information such as friends lists from Facebook or similar information from other online accounts. If you've asked us to, we'll use your Facebook profile to confirm your identity as part of our know-your-customer ("KYC") process (the process of how we check who you are).

## **3. Why do you collect, use and hold my information**

You agree to us collecting, using and holding 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 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;
- measure or analyse the effectiveness of our advertising, to provide relevant advertising to you;
- help develop and improve our website, Revolut app, Business app and the portal;
- comply with our legal and regulatory obligations both in Australia and overseas;
- share information with regulators, Australian and overseas government agencies and law enforcement;
- deal with complaints, disputes or in connection with legal claims;
- 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, Business 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;
- if you have our Credit Product, to help assess your application, establish your eligibility and manage your credit (including to help you avoid default or to assess and maintain any hardship arrangements you ask for);
- implement and manage our funding arrangements, including any securitisation arrangements we enter into;
- 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.

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

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

- to verify your identity and comply with our obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006;
- to handle and manage your credit-related information, including by providing your credit-related information to a credit reporting body, as regulated by the Privacy Act 1988 and the Privacy (Credit Reporting) Code;
- if you apply for or hold a Credit Product from us, to comply with our obligations under the National Consumer Credit Protection Act 2009;
- under Australian and international laws, we may also 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 Bankruptcy Act 1966.

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.

## 5. Who do you share my information with and why?

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

- our related companies in the Revolut Group in Australia and overseas;
- people connected with your Revolut product. For example, if you have our Business Product we may share personal information of directors, partners and Authorised Team Members with other people connected to the Business Product, and if you have Revolut <18 we may share personal information between the user and the account holder. 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 IT, 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;
- regulatory bodies in Australia 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;
- if you have our Trading Product, Third Party Broker-Dealers (Drivewealth LLC) to provide execution, settlement and clearing services;
- debt collectors, and if you have our Credit Product our collections agent Credit Clear Limited;
- 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, and their service providers;
- our external dispute resolution schemes, including the Australian Financial Complaints Authority;

- organisations that have acquired, or are wishing to acquire an interest in any part of our business from time to time; and
- if you have our Credit Product, credit reporting bodies and other information providers (see our [Credit Reporting Policy](#) for information).

## **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 offshore. 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.

We may share your information (your name, email address and app events) with our advertising partners in the ways described below, 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.

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:

- 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).

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.

## **6. 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, Business app, by email post and phone (including text message) with offers and



promotions. We may use the information we have collected about you in order to tailor our offers to you.

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 the Business app or click on the unsubscribe links on any marketing message we send you.

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

## Your rights

### 7. What are my rights?

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

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

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

#### **7.2 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 APP 12.

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 30 days.

If you are making the request on behalf of someone else (for example, if you have our Business Product or Revolut <18 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 Australian 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 Freedom of Information Act 1982.

### **7.3 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 30 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, we take reasonable steps to will associate a statement with that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading in a way that is apparent to users of the information.

### **7.4 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 or the Business 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.

### **7.5 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 or Business app. We may not be able to continue to provide services to you if you have withdrawn your consent.

## **7.6 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 Australian law or it is practicable for us to do so.

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

If you have a complaint about our management of your information in breach of the Privacy Act, APPs or a 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 also 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;
- 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 30 days and will clearly mention whether our response is final or not.

We will aim to respond to your complaint as soon as possible. If you are unhappy with how we have dealt with your complaint, or it has not been resolved within 45 days following receipt of the complaint you may refer your complaint to the Australian Financial Complaints Authority (AFCA). AFCA provides a fair and independent dispute resolution service which is free to customers. AFCA's contact details are:

*Australian Financial Complaints Authority:*

GPO Box 3 Melbourne VIC 3001

Phone: 1800 931 678

Email: [info@afca.org.au](mailto:info@afca.org.au)

Website: [www.afca.org.au](http://www.afca.org.au)

If you are concerned your personal information has been mishandled, you must first approach our team to help resolve the issue. If you are not happy with our response or we have not responded within 30 days, you may lodge a complaint with the OAIC which is free to customers. OAIC's contact details are:

*Office of the Australian Information Commissioner:*

GPO Box 5218 Sydney NSW 2001

Phone: 1300 363 992

Website: [www.oaic.gov.au](http://www.oaic.gov.au)

## 9. Will my information go outside Australia?

As we provide an international service, we may need to transfer your personal information within the Revolut Group outside Australia in order for us to provide our services. We may transfer your personal information outside of Australia to the United Kingdom and Belgium. As noted above, Revolut Australia 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.

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 have consented to your personal information being sent overseas, we are not required to take reasonable steps to ensure the overseas recipient complies with the APPs.

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

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

We take reasonable steps and precautions to keep personal information secure from loss, misuse, and interference, and from unauthorised access, modification or disclosure. Only authorised personnel have access to personal information as required to perform their roles. We store your information on our secure servers.

Any payment transactions carried out by us or our payment-processing providers will be encrypted using Secured Sockets Layer technology or a secure virtual private network. However, we do not have control over information while in transit over the internet and we cannot guarantee its security. Where information is no longer required to be held or retained by us for any purpose or legal obligation, we will take all reasonable steps to destroy or de-identify the information accordingly.

If you use a password for the Revolut app, the Revolut <18 app or our website, you will need to keep this password confidential. Please do not share it with anyone.

Unfortunately, providing information online is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee that all information you provide through the Revolut app, the Revolut <18 app or our website will be secure. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

When you use our services, which include social networking, chat room or forum features, do not share any personal information that you don't want to be seen, collected or used by other users, as this 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.

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

In Australia, pursuant to regulatory requirements for record keeping we will generally retain personal information for a period of up to seven years after ceasing to provide any designated services to you, unless there is reasonable legal or business need for us to hold the data for a longer period.

## 12. 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.

## 13. Cookies

We may use your personal information to manage our website and the Revolut app, (including troubleshooting, data analysis, testing, research, statistical and survey purposes), and to make sure that content from our website is presented in the most effective way for you and your device. For more information, please see our [Cookies Policy](#).