

The basics

1. About us

This is the Revolut Business privacy policy (the "**Revolut Business Privacy Policy**") of Revolut Payments New Zealand Pty Ltd ("**Revolut**", "**we**", "**us**" and "**our**"). We are an Australian incorporated proprietary company (ACN 645 171 651) registered as an ASIC-Overseas company in New Zealand (NZBN 9429048733212). Our registered address is Level 1, 40 Bowen Street, Pipitea, Wellington, 6011, New Zealand.

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

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

We will:

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

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

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

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

We will collect your personal information when you use:

- our website at www.revolut.com/en-NZ/

- the Revolut Business app
- any of the services available to you through the Revolut Business app or website

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

The Privacy Act does not apply to information about legal entities (for example, limited liability companies). However, it does apply to people. When we provide Revolut Business products, we process personal information of the individuals authorised to set the account up and give us instructions about the account. We also may process personal information about other employees and customers of the company that receives Revolut Business products.

When you use Revolut Business, you can be:

- an employer or an employee that is responsible for applying for and / or running a Revolut Business account on behalf of a company (for example, you can give instructions on the account), which we call an 'Account Administrator'; or
- an employee of a company that has a Revolut Business account, and your employer has invited you to use its Revolut Business account, which we call an 'Authorised Team Member'.

If more than one person is authorised to give instructions on a Revolut Business account, references in this notice to 'you' and 'your' will mean any, or all, of those people. When we refer to a 'company', we mean the company that holds the Revolut Business account.

This Revolut Business Privacy Policy explains:

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

Sometimes, we may also provide you with standalone 'just in time' privacy explanations in the Revolut Business app. When you use a new Revolut product or service for the first time, these explanations will help you to understand what specific personal information Revolut collects, uses or shares about you for that product or service

If you have concerns about how we use your personal information, you can contact us at dpo@revolut.com.

3. What personal information do you collect about me?

The types of personal information we collect depend on how you use Revolut Business. The table below explains what personal information we collect and use about you:

Types of personal information	Details
Information you give us	<p>We collect information you provide when you:</p> <ul style="list-style-type: none">✓ fill in any forms✓ correspond with us✓ respond to any of our surveys✓ register to use the Revolut Business app✓ open a Revolut Business account, are assigned to be an Account Administrator or Authorised Team Member, or use any of our services✓ create a Revolut Business profile page to facilitate receiving payments from your customers✓ take part in online discussions or promotions✓ speak with a member of our social media or customer support teams (for example, through our social media pages, website, on the phone or through the Revolut Business app)✓ enter a competition or share information with us on social media✓ contact us for other reasons <p>We will collect the following information:</p> <ul style="list-style-type: none">✓ your name, address, place of birth, date of birth, and citizenship✓ the geographic location of your business or the company that holds a Revolut Business account

Types of personal information	Details
	<ul style="list-style-type: none"> ✓ your email address, phone number and details of the device you use (for example, your phone, computer or tablet) ✓ your Revolut username which is known as your 'Revtag' (you can create your own Revtag to request payment from your customers through Revolut Business) ✓ your registration information ✓ details of the relevant Revolut Business account you are associated with, including the account number ✓ details of your Revolut Business cards including the card number, expiry date and CVC (the last three digits of the number on the back of the card) ✓ copies of your identification documents (for example, your passport or driving licence) and any other information you provide to prove you are eligible to use our services ✓ your country of residence, tax residency information and IRD number ✓ records of our discussions, if you contact us or we contact you (including records of phone calls) ✓ 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-Business (KYB) checks, to authenticate you as an authorised user of our services, or to detect and prevent fraud ✓ information about other people (such as the company's shareholders, directors, employees, customers or business partners) where we are legally required to ask for such information (for example, as part of KYB checks or under anti-money laundering laws to verify your company's sources of funds)

Types of personal information	Details
	<p>If you, or your company, give us personal information about other people, you are responsible for ensuring that they understand how we will process their personal information.</p>
<p>Information about how you use Revolut Business</p>	<p>When you use Revolut Business, we get information about:</p> <ul style="list-style-type: none"> ✓ how you use your Revolut Business account ✓ any transactions you make with your Revolut Business account ✓ your device (as explained below)
<p>Information collected from your use of our products and services</p>	<p>Whenever you use our website or the Revolut Business app, we collect the following information:</p> <ul style="list-style-type: none"> ✓ 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, 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, the mobile phone number used by the device), mobile network information, your mobile operating system and the type of mobile browser you use ✓ information about your visit, including the links you have 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 ✓ information on transactions (for example, payments into and out of your Revolut Business account), including the date, time, amount, currencies, exchange rate, beneficiary details, details of the merchant or ATMs associated with the transaction

Types of personal information	Details
	<p>(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. The Revolut Business will regularly collect this information in order to stay up to date (but only if you have given us permission)</p>
Information from your employer	<p>Where a company that holds a Revolut Business account nominates you as an Account Administrator or Authorised Team Member, your employer will give us information about you. Typically, this will include your name and business contact details. In some cases, it may also include your employment status, salary details and tax information (for example, if your employer uses Revolut Business to administer its payroll).</p>
Information from others	<p>We collect personal information from third parties, such as credit reference agencies, financial or credit institutions, official registers and databases, as well as 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 you and information relating to your transactions. We have explained more in the <i>Do you run credit checks on me?</i> section below.</p>
Information from websites or social media	<p>We may collect information about you if you make it publicly available on websites, social media websites or apps. Publicly available information from social media websites or apps</p>

Types of personal information	Details
	<p>may also be provided to us when we conduct general searches on you.</p> <p>We do this as part of our KYB checks and to comply with our anti-money laundering or sanctions screening obligations.</p>
Information from publicly available sources	We collect, or may ask you to provide, personal information from publicly available sources, such as media stories, online registers or directories, and websites for enhanced due diligence checks, security searches and KYB purposes.

4. How do you use my personal information?

What we use your personal information for:

Checking your identity

Whenever you sign up with Revolut Business, we'll use your personal information to check your identity (as part of our KYB process). This may include facial scan data extracted from any photo or video you submit (known as 'biometric data').

Providing our services

Whenever you apply for or use a Revolut Business product or service, we'll use your personal information to:

- decide whether or not to approve your application
- meet our contractual and legal obligations relating to any Revolut Business products or services you use (for example, making payments into and out of your Revolut Business account)
- exercise other rights we have under any agreement we have with you
- provide you with customer support services. We may record and monitor any communications between you and us, including phone calls, to maintain appropriate records, check your instructions, analyse, assess and improve our services, and for training and quality control purposes

Protecting against fraud

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

Marketing and providing new products and services that might interest you

We use your personal information to do the following:

- provide you with information about other products and services we offer that are similar to those you have already used (or asked about, where allowed by law)
- if you agree, provide you with information about our partners' promotions or offers which we think you might be interested in
- if you agree, allow our partners and other organisations to provide you with information about their products or services
- measure or understand the effectiveness of our marketing and advertising, and provide relevant advertising to you
- ask your opinion about our products or services

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

To keep our services up and running

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

We also use your personal information to:

- authenticate you as an authorised user of our services when necessary (for example, if you contact our customer support or social media teams)
- allow you to take part in interactive features of our services
- tell you about changes to our services
- help keep our website and the Revolut Business app safe and secure

Preparing anonymous statistical datasets

We prepare anonymous statistical datasets about our customers' spending patterns:

- for forecasting purposes
- to understand how customers use Revolut Business
- to comply with governmental requirements and requests

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 information and you will never be identifiable from it. Anonymous statistical data cannot be linked back to you as an individual.

For example, some countries have laws that require us to report spending statistics and how money enters or leaves each country. We will provide anonymised statistical information that explains the broad categories of merchants that Revolut Business customers in that country spend their money with. We will also provide information about how Revolut Business customers top up their accounts and transfer money. However, we will not provide any customer-level information. It will not be possible to identify any individual Revolut Business customer.

Improving our products and services

We use your personal information 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 Business products.

Meeting our legal obligations, enforcing our rights, protecting our business and other legal uses

We use your personal information:

- to share it with other organisations (for example, government authorities, law enforcement authorities, tax authorities, fraud prevention agencies)
- if this is necessary to meet our legal or regulatory obligations
- to protect ourselves, including our rights, property, personnel or products
- to help prevent and fight harmful or unlawful behaviour and spam communications
- in connection with legal claims
- to help detect or prevent crime
- You can find out more in the *Do you share my personal information with anyone else?* section below.

- Sometimes, we are legally required to ask you to provide information about other people. For example, we might ask you to explain:
- your relationship with somebody who pays money into your Revolut Business account
- how somebody got the money in the first place to pay it into your Revolut Business account

If you, or your company, give us personal information about other people, it is your responsibility to ensure they understand how we will process their personal information.

5. Do you make automated decisions about me?

Depending on the Revolut Business 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:

Opening accounts

- KYB, anti-money laundering and sanctions checks
- identity and address checks

Detecting fraud

- monitoring your account to detect fraud and financial crime

6. Do you run credit checks on me?

We will share your personal information with credit reference agencies, or other providers of credit information, to:

- confirm details you provide when applying for a Revolut Business account or specific Revolut products
- make an assessment about whether to accept a Revolut Business or specific Revolut Business product application

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

If you sign up to use Revolut Business, we will assume you want to be contacted by post, push notification, email and SMS text message with information about Revolut products, services, offers and promotions. We will get your consent in advance to send direct marketing messages to you. We may use the personal information we have collected about you in order to tailor our offers to you.

You can tell us you don't want to hear from us at any time. Just 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 of companies for their marketing purposes without your permission. You can find out more in the *Do you share my personal information with anyone else?* section.

If you are an Authorised Team Member or customer of a company that holds a Revolut Business account, the company, rather than Revolut, is responsible for helping you with your request.

If Revolut is responsible for helping with your request, we may not 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).

8. What are my rights?

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

We provide this privacy policy to explain how we use your personal information. You can ask to see the personal information we hold about you.

8.2 You can ask to access your personal information.

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

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

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

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

If you are making the request on behalf of someone else, we may ask you for information to verify your identity or your authority to make the request.

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

- if we believe giving you access may endanger the life, health or safety of an individual;
- giving you access would have an unreasonable impact on the privacy of other individuals;
- your personal information is part of existing or anticipated legal proceedings between us and would not be discoverable;
- giving access would reveal commercially sensitive information within our negotiations;
- giving access would be unlawful, or denying access is required or authorised by or under New Zealand law;
- we suspect that unlawful activity, or misconduct of a serious nature has taken place and giving access would likely prejudice appropriate action in relation to the matter;
- giving access would likely prejudice one or more enforcement related activities from an enforcement body; or
- giving access would reveal evaluative information generated in connection with a commercially sensitive decision-making process.

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

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

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

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

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

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

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

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

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

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

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

8.5 You can withdraw your permission.

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

8.6 Anonymity and using a pseudonym

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

9. How do I exercise my rights?

If you are an Authorised Team Member or customer of the company that holds the Revolut Business account, please contact that company.

If you were authorised to set the Revolut Business account up, or give us instructions about the account (for example, you are an Account Administrator), you can contact us through the Revolut Business app send us an email at dpo@revolut.com.

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

If a third party exercises one of these rights on your behalf, we may need to ask for proof that a third party has been validly authorised to act on your behalf.

When you exercise one of these rights, it may take us up to one month to implement your changes.

Revolut will usually not charge you a fee when you exercise your rights. However, we are allowed by law to charge a reasonable fee.

10. How do I raise a complaint?

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

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

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

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

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

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

You can make a complaint using the Privacy Commissioner's online complaint form.

11. Do you share my personal information with anyone else?

Revolut group companies

We share your personal information 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 Business products
- 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

Suppliers

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

Type of supplier	Why we share your personal information
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

Type of supplier	Why we share your personal information
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 Business card
Analytics providers and search information providers	To help us improve our website or the Revolut Business 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 post, emails, push notifications and text messages

Partners who help to provide our services

We may share your personal information with our partners to provide you, or the company that holds the Revolut Business account, with certain requested services.

We'll only share your personal information in this way if you, or the company that holds the Revolut Business account, have asked for the relevant service or it is provided as part of our membership plans.

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

Credit reference agencies

As set out at the *Do you run credit checks on me?* section, if you apply for a Revolut Business account or specific product, we may share your personal information with credit reference agencies.

Other third parties

We may share your personal information with other third parties where this is necessary to facilitate you receiving payments into your Revolut Business account.

For legal reasons

We also share your personal information with other financial institutions, financial services companies, 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 are eligible to use our products and services.

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

We may also need to share your personal information with other third party organisations or authorities:

- if we have to do so under any law or regulation
- if we sell our business
- in connection with suspected or actual criminal or fraud investigations
- to enforce our rights (and those of our customers or others)
- in connection with legal claims

Social media and advertising companies

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

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

You can contact us at any time, either through the Revolut Business app or by emailing dpo@revolut.com, if you don't want us to share your personal information for advertising purposes.

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 information

Where you direct us to share your personal information with a third party, we may do so. For example, you may authorise third parties to act on your behalf (such as a lawyer or accountant). We may need to ask for proof that a third party has been validly authorised to act on your behalf.

12. Will my personal information go outside of New Zealand?

As we provide an international service, we may need to transfer your personal information outside New Zealand in order for us to provide our services.

We may send your personal information outside of New Zealand to:

- keep to global legal and regulatory requirements
- provide ongoing support services
- fraud prevention agencies or law enforcement authorities
- enable us to provide you with products or services you have requested

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

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

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

13. How do you protect my personal information?

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

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

We have detailed information security and data protection policies which our employees are required to follow when they handle your personal information. Our employees receive data protection and information security training. Electronic data

and databases are stored on secure computer systems with access controls in place to limit physical, system and information access to only authorised employees.

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

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

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

You are responsible for keeping your Revolut Business account secure by keeping your passwords, PINs, and one-time passcodes private. Do not share this information with anyone, as it may allow them access to your Revolut Business account and personal information. Remember, Revolut will never ask you for these details through phone calls, emails, or texts.

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

14. How long will you keep my personal information for?

We will keep your personal information:

- 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 information for specific time periods by KYB, anti-money laundering, and payment services laws. Revolut has detailed policies and procedures in place to ensure we comply with these requirements.

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

15. How will you keep me updated about how you use my personal information?

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

16. Do you use cookies?

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

We also use pixels or web beacons in the direct marketing emails that we send to you. These pixels track whether our email was delivered and opened, and whether links within the email were clicked. They also allow us to collect information such as your IP address, browser, email client type and other similar details. We use this information to measure the performance of our email campaigns, and for analytics.