Privacy Notice for Revolut Business Customers in the UK and EEA

Effective 1 October 2023



REVOLUT BUSINESS CUSTOMER PRIVACY NOTICE

Effective date: 1 October 2023

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We are 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 your marketing choices at any time

1. About us

The Revolut company providing you with a product or service to you will be responsible for processing your personal data for that product or service. This Revolut company is known as the 'controller' of your personal data.

Revolut provides products and services to you through different companies. You can check out the Revolut companies that are responsible for your personal data here.

2. Why do I need to read this notice?

We will collect your personal data when you use:

- our website at <u>www.revolut.com</u>
- the Revolut Business app
- any of the services available to you through the Revolut Business app or website

We may also collect your personal data from other people or companies. We explain how this can happen in more detail at *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, if you are a director of a company applying for a Revolut Business account, or are able to give us instructions about a Revolut Business account, we may ask you to provide identification documents)
- can be used to personally identify you (for example, a combination of your name and postal address)

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

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 notice explains what personal data we collect, how we use it, and your rights if you want to change how we use your personal data. This notice only applies to personal data. It does not apply to company information.

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

We may provide privacy notices in languages other than English. If there are any discrepancies between other language versions and the English language versions, the English language version is authoritative.

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

3. What personal data do you collect about me?

The types of personal data we collect depend on how you use Revolut Business. When you use Revolut Business, you can be:

- a freelancer, sole trader or sole proprietor that has applied for a Revolut Business account, which
 we call a 'Freelancer'
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- 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'
- 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 a '**Team Member**'

If you are a:

- Freelancer or Account Administrator, we are the 'controller' of your personal data when we provide you with Revolut Business
- Team Member, the company that holds the Revolut Business account you have been invited to
 use, is a 'controller' of your personal data. Please contact it if you have any questions about how
 your personal data is processed by Revolut Business on its behalf
- customer of a company that holds a Revolut Business account, that company is a 'controller' of
 your personal data. Please contact it if you have any questions about how your personal data is
 processed by Revolut Business on its behalf
- prospective Revolut Business customer who has not yet applied for a Revolut Business account, but may have received information about Revolut Business, we provide you with a separate privacy notice available here

The table below explains what personal data we collect and use about you:

¹ Revolut will stop onboarding Freelancers to Revolut Business in 2024.

Type of personal data	Details
Information you give us	We collect information you provide when you:
	✓ 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 Team Member, or use any of our services
	✓ create a Revolut Business profile page to facilitate receiving payments from your customers
	✓ give us access to your, or your company's, other financial accounts (for example, through Open Banking)
	✓ 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
	We will collect the following information:
	✓ your name, address, place of birth, date of birth
	✓ 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, sort code and IBAN
	✓ details of your Revolut Business cards (or other 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)
	✓ 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 tax identification
	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)
	If you, or your company, give us personal data about other people, you are
	responsible for ensuring that they understand how we will process their
	personal data.
Information about how you use Revolut	When you use Revolut Business, we get information about:
Business	✓ how you use your Revolut Business account
	✓ any transactions you make with your Revolut Business account
	✓ your device (as explained below)

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Information collected from your use of our products and services	Whenever you use our website or the Revolut Business 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, device language, the operating system and
	platform, the type of device you use, whether your device uses a virtual private
	network (VPN), a unique device identifier (for example, your device's IMEI
	number, or the mobile phone number used by the device), mobile network
	information, your mobile operating system and the type of mobile browser you
	use
	✓ 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 (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
	✓ information stored on your device. The Revolut Business app will regularly
	collect this information in order to stay up to date (but only if you have given us
	permission)
Information from your employer	Where a company that holds a Revolut Business account nominates you as an Account Administrator or 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).
Information from others	We collect personal data 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.

	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 <u>Do you run credit checks on me?</u> section below. When you ask us to, we'll also collect personal data from accounts you, or your company, have with third party financial institutions (when you create a linked account by activating Open Banking in the Revolut Business app).
Information from websites or social media	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 may also be provided to us when we conduct general searches on you. We do this as part of our KYB checks and to comply with our anti-money laundering or sanctions screening obligations.
Information from publicly available sources	We collect, or may ask you to provide, personal data 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. 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 interest 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.

- Consent



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

We explain more about how we use your personal data in the <u>How do you use my personal data?</u> 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
Checking your identity Whenever you sign up with Revolut Business, we'll use your personal data 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').	 Legal obligations Substantial public interest Consent (where required by law)
Providing our services Wheneveryou apply for or use a Revolut Business product or service, we'll use your personal data 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) help you understand your, or your company's, Revolut Business usage and spending behaviour (for example, by providing you with spending insights) 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	 Keeping to contracts and agreements between you and us Legitimate interests (we need to be efficient about how we meet our obligations and we want to provide you with good products and services) Legal obligations

Protecting against fraud

We use your personal data 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.

- Legitimate interests (to develop and improve how we deal with financial crime and meet our legal responsibilities)
- Substantial public interest
- Consent (where required by law)
- Legal obligations

Marketing and providing new products and services that might interest you

We use your personal data 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 <u>How do you use my personal data for marketing?</u> section below explains how to do this).

- Legitimate interests (to send business-to-business marketing, develop our products and services, ensure our marketing is relevant to your interests, and to be efficient about how we meet our legal and contractual duties)
- Consent (where we are legally required to get your consent for business-to-business marketing)

To keep our services up and running

We use your personal data 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 data 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

- Keeping to contracts and agreements between you and us
- 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)
- Consent (where required by law)

- tell you about changes to our services help keep our website and the Revolut Business app safe and secure Preparing anonymous statistical datasets Legitimate interests (to conduct research and analysis, including to produce statistical research and We prepare anonymous statistical datasets about our customers' spending patterns: reports) Legal obligations - 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 data 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 customerlevel information. It will not be possible to identify any individual Revolut Business customer. Improving our products and services Legitimate interests (to understand how customers use our products so We use your personal data to help us develop and improve our we can develop new products and current products and services. This allows us to continue to improve the products we currently provide products and services that our customers want to use. provide) 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 Legitimate interests (for example, our business and other legal uses to protect Revolut during a legal dispute) We use your personal data: Substantial public interest (if we process your sensitive personal

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 <u>Do you share my personal data</u> <u>with anyone else?</u> 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 data about other people, it is your responsibility to ensure they understand how we will process their personal data.

data to keep to legal requirements that apply to us)

- Legal obligations

6. 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 <u>What are my rights?</u> 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

Our legal basis is one or more of the following:

- keeping to contracts 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 will share your personal data 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

The personal data we share with, and receive from, credit reference agencies (or other providers of credit information) will vary depending on the country you live in. We will provide full details during the relevant application process.

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 apply for a Revolut Business account or specific Revolut Business product)

8. How do you use my personal data for marketing?

If you sign up to use Revolut Business, and where national laws allow, 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. Where national laws require us to get your consent to send direct marketing messages, we will do so in advance. We may use the personal data 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 <u>Do you share my personal data</u> <u>with anyone else?</u> section.

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 more relevant to your interests)

9. What are my rights?

If you are a 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).

Your right	What it means
You have the right to be told about how we use your personal data	We provide this privacy notice to explain how we use your personal data.
You have the right to ask us for a copy of your personal data	If you ask, we will 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.
You can ask us to correct your personal data if you think it's wrong	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.
You can ask us to delete your personal data	You can ask us to delete your personal data if: ✓ there's no good reason for us to continue using it
	✓ you gave us consent (permission) to use your personal data and you have now withdrawn that consent
	✓ you have objected to us using your personal data
	✓ we have used your personal data unlawfully

	✓ the law requires us to delete your personal data Just to let you know, we may not be able to agree to your request. As a regulated 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). We may not be able to delete your entire file because these regulatory responsibilities take priority. We will always let you know if we can't delete your personal data.
You can object to us processing your personal data for marketing purposes	You can tell us to stop using your personal data, including profiling, for marketing.
You can object to us processing other personal data (if we are using it for legitimate interests)	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. If you object to us using personal data which we need to provide our services, we may need to close your Revolut Business account as we won't be able to provide the services.
You can ask us to restrict how we use your personal data	You can ask us to suspend using your personal data if: ✓ you want us to investigate whether it is accurate
	 ✓ our use of your personal data is unlawful but you do not want us to delete it ✓ we no longer need your personal data, but you want us to continue holding it for you in connection with a legal claim
	✓ 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
You can ask us to transfer personal data to you or another company	If we can, and are allowed to do so under regulatory requirements, we will provide your personal data in a structured, commonly used, machine-readable format.
You can withdraw your permission	If you have given us any consent we need to use your personal data, you can withdraw your consent at any time by sending an email to dpo@revolut.com .

	(Please note, it will have been lawful for us to use the personal data up to the point you withdraw your permission).
You can ask us to carry out a human review of an automated decision we make about you	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?

If you are a 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 a Freelancer or Account Administrator), you can 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 or refuse to act on your request if it is manifestly unfounded or excessive.

If you're unhappy with how we've handled your request you can complain to your <u>local data protection</u> <u>authority</u>. In the United Kingdom, this is the Information Commissioner's Office (<u>website</u>). In the European Economic Area, our cross-border data protection authority is the Lithuanian State Data Protection Inspectorate (<u>website</u>).

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 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 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, 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 data with our partners to provide you, or the company that holds the Revolut Business account, with certain requested services. For example, where you choose, we will share personal data with:

- acquiring partners who help us to provide you with payment services
- deposit taking banks who help us to provide you with Savings Vaults

We'll only share your personal data 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 data with those partners. We will always make sure you understand how we and our partners process your personal data for these purposes.

Credit reference agencies

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

Other third parties

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

For legal reasons

We also share your personal data 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, antimoney 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 data 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

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

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 Business app or by emailing dpo@revolut.com, if you don't want us to share your personal data 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 data

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

We will share your personal data with other companies (through the <u>Revolut Business API</u>) when you switch this function on through Revolut Connect.

12. Will my personal data go outside of the United Kingdom or Europe?

As we provide an international service, we may need to transfer your personal data outside the United Kingdom or European Economic Area (EEA) in order for us to provide our services.

We may send your personal data outside of the United Kingdom or EEA 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

If we transfer your personal data to another country that does not offer a standard of data protection equivalent to the United Kingdom or EEA, we will make sure that your personal data is sufficiently protected. For example, we will make sure that a contract with strict data protection safeguards is in place before we transfer your personal data. In some cases, you may be entitled to ask us for a copy of this contract

If you would like more information, please contact us by sending an email to dpo@revolut.com.

13. How do you protect my personal data?

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

We use a variety of organisational 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



We have detailed information 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. 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 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 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.

If you use a password, PIN or generated authorisation 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 specific time periods by KYB, anti-money laundering, banking and e-money laws. These time periods vary from country to country. 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 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 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 <u>Cookies Policy</u> 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.