

Last updated: 21 March 2024

## **1. Introduction**

This privacy notice sets out how we will handle your personal data when you use Revolut Pay Checkout.

Revolut Pay Checkout is a fast checkout service we provide to customers which participating merchants can choose to make available on their websites. Before using Revolut Pay Checkout, you must first agree to our [Terms and Conditions](#).

If you hold an account with us in the Revolut app, please refer to our [Customer Privacy Notice](#) for details about how we process your personal data when you use our other products and services.

We are committed to protecting and respecting your privacy.

We will:

- always keep your personal data safe and private;
- never sell your personal data; and
- allow you to manage and exercise your data subject rights at any time.

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

## **2. Who is responsible for processing my personal data?**

If the merchant you make your first Revolut Pay Checkout purchase with is based in the United Kingdom, the Revolut company which will be responsible for your personal data is Revolut Ltd.

If the merchant you make your first Revolut Pay Checkout purchase with is based in the European Economic Area (EEA), the Revolut company which will be responsible for your personal data is Revolut Bank UAB.

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

If you sign up to use Revolut Pay Checkout and do not hold an account with us in the Revolut app, we will collect your:

- name;
- date of birth;
- phone number;
- email address;
- shipping address;
- preferred shipping method;

- billing address; and
- credit/debit card details (including card number, expiry date and CVV).

If you have an account with us in the Revolut app, we already have most of this information. However, we will still need to ask you to include your shipping address and preferred shipping method for specific purchases you make through Revolut Pay Checkout. You can also choose to add external (non-Revolut) cards to your Revolut Pay Checkout profile if you'd rather pay through another account. We will automatically add any card(s) you have used to top up your Revolut account to your Revolut Pay Checkout profile. However, you can delete this at any time by clicking on the bin icon displayed next to each payment method in your Revolut Pay Checkout profile if you don't want your card saved in this way.

We will usually collect the personal data described above from you directly. However, we may also receive certain information from the relevant merchant. This will depend on how the relevant merchant has chosen to integrate Revolut Pay Checkout into their website.

We need to process the personal data set out above to provide you with the Revolut Pay Checkout service. If you do not provide us with this information, we will not be able to:

- provide you with the service; or
- process your purchase.

We may also process certain technical details regarding your device (including your device details, IP address, service provider, location, date and time, browser and language) if you ask us to remember your device to log you in to Revolut Pay Checkout automatically for any future purchases you wish to make using the service.

#### **4. When we act as a "controller" and "processor"**

We act as both a controller and a processor (acting on behalf of the relevant merchants who make Revolut Pay Checkout available on their websites) of your personal data when you use Revolut Pay Checkout. This privacy notice primarily sets out information we need to provide you when acting as a controller.

When you make a purchase using Revolut Pay Checkout on a merchant's website, the merchant will also be a controller of your personal data. We advise you to review the merchant's privacy notice for information about how they will handle your personal data.

#### **5. How do you use my personal data?**

As a controller, we need to have a legal basis to process your personal data for any purpose under data protection laws. We have set out the purposes for which we process your personal data and the lawful basis for this in the table below.

<b>What we use your personal data for</b>	<b>Our legal basis for using your personal data</b>
To carry out checks to ensure you are eligible to use Revolut Pay Checkout.	Keeping to contracts and agreements between you and us.
To provide you with the Revolut Pay Checkout service.	Keeping to contracts and agreements between you and us.
To authenticate your device each time you use Revolut Pay Checkout (if you have asked us to remember your device for subsequent transactions using Revolut Pay Checkout).	Consent.
To send an SMS with a one time passcode to verify your identity each time you use Revolut Pay Checkout (unless you have asked us to remember your device).	Keeping to contracts and agreements between you and us.
To store some of your personal data to make it easier for you to use our other products, for example, by automatically filling in your registration information (such as your name and contact details) when you sign up to the Revolut app.	Legitimate interests (to provide you with a seamless customer experience across our range of products and services).
If you are a Revolut account holder, we will automatically add any card(s) you have used to top up your Revolut account to your Revolut Pay Checkout profile.	Legitimate interests (to provide you with a seamless customer experience across our range of products and services).
To send you details of how to claim any rewards (such as cashback) offered to you during the checkout process.	Legitimate interests (to market our services and grow our business). Note, you will always be given the option to opt out of receiving such communications as part of the checkout process. If you are in Poland or Hungary, we will ask for your consent to send such communications.

What we use your personal data for	Our legal basis for using your personal data
To carry out checks to protect against fraudulent payments.	Legitimate interests (to protect you and us against fraud).
If you are not a Revolut account holder and are using Revolut Pay Checkout on a Stripe merchant's website (meaning we do not have a direct relationship with the merchant), we will share your card details with Stripe for processing on behalf of the merchant.	Legitimate interests (to ensure your purchase is processed).

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

### *Revolut group companies*

We may share your personal data within the Revolut group of companies to provide you with Revolut Pay Checkout.

### *Suppliers and partners*

We may share your personal data with third party suppliers and partners who help us provide or make available Revolut Pay Checkout. Such third party suppliers and partners may include:

- suppliers who provide us with data hosting, database and card processing services; and
- our banking and financial services partners and payments networks, including Visa, Mastercard and Stripe.

### *Merchants*

We will share your personal data with merchants to the extent necessary for them to provide you with their products and/or services and to allow us to fulfil our contractual obligations to them.

Please note that we will be acting as a processor on behalf of the relevant merchant when providing them with this information.

### *For legal reasons*

We may share your personal data with third parties:

- if we are legally required to do so;
- if we believe, in good faith, that such disclosure is necessary to comply with a legal obligation or request;
- to enforce our terms and conditions; or
- to protect your, or our, rights and safety.

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

This will depend on whether or not you hold an account with us in the Revolut app. If you use Revolut Pay Checkout and do not have an account with us in the Revolut app, we will retain your personal data for one year following:

- the termination of your Revolut Pay Checkout account; or
- the date of your last transaction using Revolut Pay Checkout.

If you use Revolut Pay Checkout and also have a payment account with Revolut, we will retain your personal data in accordance with the data retention period set out in our [Customer Privacy Notice](#).

## **8. Additional information**

Please refer to the relevant sections of our [Customer Privacy Notice](#) for more information about:

- your rights as a data subject;
- your right to complain to your local data protection supervisory authority about how we handle your personal data;
- international transfers of your personal data outside the UK or EEA (as applicable); and
- how we protect your personal data.

## **9. Updates**

We may update this privacy notice from time to time. Any changes will be posted on this page. If we make any material changes to this privacy notice, we may notify you by email before the change becomes effective.