

Last updated: 15 June 2026.

1. Introduction

This privacy notice sets out how Revolut collects, uses, stores, and protects your personal data when you use the Revolut Pay with Smile service ('PWS').

2. Who is responsible for processing my personal data?

In the United Kingdom, Revolut Bank UK is the organisation responsible for collecting and using your personal data for the purposes set out in this privacy notice.

Revolut Bank UK is a British company having its registered address at 30 South Colonnade, London, E14 5HX.

We refer to Revolut Bank UK as 'Revolut', 'we', 'us', or 'our' throughout this privacy notice.

3. What personal data do you collect about me?

To provide you with the secure and seamless PWS experience, we only collect personal data that is strictly necessary to recognise you and safely process your payment:

- **biometric authentication data:** when you look at the payment terminal camera, the device securely captures a photo of your face. This is converted into encrypted, single-use digital codes (facial embeddings) to authenticate your identity.
- **transaction validation details:** to finalise your purchase and ensure security, diagnostics, troubleshooting, and regulatory compliance, we securely process basic checkout transaction attributes, encrypted payment parameters, and cryptographic device signatures.
- **dispute and fraud prevention imagery:** a secure copy of the original transaction photo is uploaded to our internal cloud systems. This is held strictly as a fallback safety measure to protect you and investigate potential fraud or payment disputes. It is never used for the primary identity check at the payment terminal.

4. How do you use my personal data?

We need to have a legal basis to process your personal data for any purpose under data protection laws. The purposes for which we use your personal data and the corresponding lawful basis are set out in the table below.

What we use your personal data for	Our legal basis for using your personal data
Verifying your identity at checkout: recognising your face at the payment terminal to instantly confirm you are the legitimate account holder and securely authorise your payment.	Explicit consent: you proactively and explicitly grant us permission when you first join PWS in your Revolut app. You confirm your consent again through the payment terminal at checkout.
Providing PWS: enabling you to use PWS as a payment method and processing your payment when you choose to use it.	Performance of a contract: we need to process your personal data to provide you with the PWS service which you have chosen to use.
Security and liveness checks: checking that a real, live person is standing in front of the payment terminal to prevent fraudsters from using photos, videos, or masks.	Explicit consent: you proactively and explicitly grant us permission when you first join PWS in your Revolut app. You confirm your consent again through the payment terminal at checkout.
Legal and regulatory compliance: to comply with applicable financial crime, AML/CFT, regulatory and legal obligations.	Legal obligation: we need to comply with our statutory financial crime obligations under applicable laws.
Fraud prevention, dispute handling and service security: to protect your account, prevent and investigate fraud, resolve payment disputes, and maintain the security and integrity of PWS.	Legitimate interests: this is necessary to maintain a secure payment ecosystem, protect your funds, and fulfill financial safety standards.
Diagnostic and troubleshooting: understanding how you use PWS to allow us to carry out research and analytics, as well as to troubleshoot any technical issues.	Legitimate interests: this is necessary to maintain and improve our services.

Using PWS is completely voluntary. You can disable the feature, or withdraw your consent, at any time through the following settings in your Revolut app:

- **freezing PWS:** temporarily stops face-match payments but keeps all your data securely stored in our system for when you want to unfreeze it.
- **withdrawing consent (opting-out):** permanently deactivates PWS and triggers the immediate deletion of your biometric template from our relevant database. If you want to use PWS again in the future, you will have to re-enrol in PWS afresh.

Freezing or turning off PWS will never affect your primary Revolut account status or your ability to pay using cards or phone wallets.

5. Do you share my personal data with anyone else?

All data processing occurs entirely within our own proprietary application environment. We will not share your personal data with any third parties, with the sole exception of our cloud provider, for secure data storage and infrastructure services.

6. How long will you keep my personal data for?

We only keep PWS personal data for as long as we need it. The temporary facial embeddings created from your checkout photo are used once to authenticate you for that transaction and are deleted immediately after the identity check is completed.

We will keep other PWS data, such as checkout information, device information, diagnostic information, your image, fraud prevention and dispute records, in line with Revolut's applicable data retention policies.

7. 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;
- international transfers of your personal data outside the United Kingdom or European Economic Area (as applicable); and
- how we protect your personal data.

When you use PWS, our systems automatically match your photo to verify your identity and approve the payment. This process is automated. Due to this, we would like to inform you that if:

- the match fails, is inconclusive, or falls below our security threshold, you will not be blocked or denied from the service. You will instead be offered alternative payment methods (such as tapping your physical card, phone or using Revolut Pay in-app) to complete your purchase; and
- you believe your biometric match was wrongly rejected, you can contest the decision, express your point of view, and request a human review at any time by contacting Revolut support through our standard in-app chat.

If you have any questions or concerns about how we use your personal data, you can contact our Data Protection Officer at dpo@revolut.com.

8. Updates

We may update this privacy notice from time to time. Any changes will be posted on this page.