## The basics

#### 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 review your marketing choices at any time.

## 1. About us

The Revolut group is made up of **different companies**. We will let you know which Revolut company you have a relationship with when you first apply for or use a Revolut product or service.

You can always tell which Revolut company you have a primary relationship with by scrolling to the bottom of the 'settings' section in the Revolut app.

## 2. Why do I need to read this policy?

We will collect your personal data when you use:

- our website at www.revolut.com;
- the Revolut app; or
- any of the services you can get access to through the Revolut app or website.

When we say 'personal data', we mean information which can be used to personally identify you (for example, a combination of your name and postal address).

#### THIS POLICY CONTAINS IMPORTANT INFORMATION

This policy explains what information we collect, how we use it, and your rights if you want to change how we use your personal data.

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

## Your personal data

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

#### **WE COLLECT DIFFERENT TYPES OF PERSONAL DATA FROM YOU AND OTHERS** The information below explains what personal data we collect and use.

#### Information you give us

#### We collect information you provide when you:

- fill in any forms;
- correspond with us;
- register to use the Revolut app;
- open an account or use any of our services;
- take part in online discussions, surveys or promotions;
- speak with a member of our customer support team (either on the phone or through the Revolut app);
- enter a competition; or
- contact us for other reasons.

#### We will collect the following information:

- 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);
- Your Revolut username (this is random and is automatically assigned to you when you first join but you will be able to change it), password and other registration information;
- Details of your bank account, including the account number, sort code and IBAN;
- Details of your Revolut debit cards and credit cards (or other debit or credit 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);
- Identification documents (for example, your passport or driving licence), copies of any documents you have provided for identification purposes, and any other information you provide to prove you are eligible to use our services;
- Information you provide when you apply for credit, including details about your income and financial obligations;
- Records of our discussions, if you contact us or we contact you (including records of phone calls);
- Your image in photo or video form (where required as part of our Know-Your-Client (KYC) checks or where you upload a photo to your Revolut account).

If you give us personal data about other people (such as your spouse or family), or you ask us to share their personal data with third parties, you confirm that you have brought this policy to their attention beforehand.

#### Information from your device

#### Whenever you use our website or the Revolut 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 timezone 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.

- Information about your visit, 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 on 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 (including merchants' and ATMs' locations), 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.
- Information stored on your device, including if you give us access to contact information from your contacts list. The Revolut app will regularly collect this information in order to stay up to date (but only if you have given us permission).

#### Information about your location

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

#### Information from your employer (for Revolut Business only)

If your employer uses Revolut Business and nominates you as a Revolut cardholder or account user, your employer will provide us with information about you. Typically, this will include your name and business contact details.

# If your employer nominates you as a Revolut Business cardholder or account user, we will also get information about:

- how you use your Revolut Business card;
- any transactions you make with your Revolut Business card; and
- your device (as explained above).

#### 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 your spouse and family (if applicable in the context of an application for credit that you make) and information relating to your transactions.

When you ask us to, we will also collect personal data from accounts you hold with third party banks (and some accounts with third party providers that aren't banks) so that you can see everything in one place in your Revolut app. You can create a linked account by activating Open Banking in the app.

#### Information from social media

Occasionally, we will use publicly available information about you from selected social media websites or apps to carry out enhanced due diligence checks. Publicly available information from social media websites or apps may also be provided to us when we conduct general searches on you (for example, to comply with our anti-money laundering or sanctions screening obligations).

If you are a Revolut Business customer, we may collect information about you if you make it publicly available on social media websites or apps. We only do this as part of our Revolut Business KYC checks. For example, if you have not yet set up a website for your business, we may need to look at information available on social media websites or apps to make sure your business is legitimate.

#### Information from publicly available sources

We collect information and contact details from publicly available sources, such as media stories, online registers or directories, and websites for enhanced due diligence checks, security searches, and KYC purposes for Revolut Business customers.

#### **REVOLUT BUSINESS CUSTOMERS**

If you are a Revolut Business customer, we will need to confirm your identity as part of our KYC process. We will ask you to provide documents, and will also collect information from third parties, such as commercial registers, for this purpose.

## 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, or share it with other organisations, because we have a legitimate reason to use it and this is reasonable when balanced against your right to privacy.

#### • Consent

Where you've agreed to us collecting your personal data, for example when you have ticked a box to indicate you are happy for us to use your personal data in a certain way. We have explained more about how we use your personal data in the **How do you use my** information? section below.

#### Substantial public interest

Where we process your sensitive personal data (sometimes known as special category personal data) to adhere to government regulations or guidance, such as our obligation to support you if

you are or become a vulnerable customer.

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

We use your personal data so we can provide the best service, tell you about products and services you may be interested in, and meet our legal obligations.

#### **PROVIDING OUR SERVICES**

Whenever you apply for a product or service, we will use your personal data to check your identity (as part of our KYC process) and decide whether or not to approve your application.

If you are already a Revolut customer, we use your personal data to meet our obligations relating to any transactions you make (for example, making payments into and out of your Revolut account, withdrawing cash or making payments with your Revolut Card). If you ask us to exchange the currency of the e-money you hold in your Revolut account, we'll use your personal data to help us do that.

Where you hold a credit product with us, we use your personal data to recover debt and exercise other rights we have under any agreement we have with you.

We use your personal data to give you details of our products and services and to help us develop new products and services.

We use your personal data to contact you by phone and provide you with information about our products or services, as well as customer support services. We may monitor or record 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.

Revolut Junior is our account for children and teenagers aged between 7 and 17. We have a separate **Data Privacy Statement for Revolut Junior** that explains how we process Revolut Junior customers' personal data. The Data Privacy Statement is specifically designed to be understood by children and teenagers.

#### HERE'S AN EXAMPLE OF HOW WE USE YOUR PERSONAL DATA TO PROVIDE OUR SERVICES

If you apply for a credit product, we or our lending partner (the provider of the credit product) will carry out a credit check to better understand your financial circumstances and repayment history.

Our legal basis is one or more of the following:

- 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); or
- legal obligations.

#### **PROTECTING AGAINST FRAUD**

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

**HERE'S AN EXAMPLE OF HOW WE USE YOUR PERSONAL DATA TO PROTECT AGAINST FRAUD** If you have switched on location services in the Revolut app and your mobile phone tells us that you're in the United Kingdom, but your Revolut Card is being used in Spain, we may not process that transaction.

Our legal basis is one or more of the following:

- keeping to contracts and agreements between you and us;
- legitimate interests (to develop and improve how we deal with financial crime and meet our legal responsibilities); or
- 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).
- provide you with information about our products or services 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 privacy settings in the Revolut app or by emailing our Data Protection Officer at **dpo@revolut.com**.
- 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.

process applications for products and services available through us, and make decisions about whether to approve applications.

Remember, you can ask us to stop sending you marketing information by adjusting your marketing choices (the **Do you use my information for marketing?** section below explains how to do this).

#### HERE'S AN EXAMPLE OF HOW WE USE YOUR PERSONAL DATA FOR MARKETING

If you are a Revolut customer, we may contact you about optional extras or promotional offers. We may use personal data we gather about you through your use of our services to tailor these offers to you.

Our legal basis is one or more of the following:

- legitimate interests (to develop our products and services, define types of customers for new products or services, and to be efficient about how we meet our legal and contractual duties); or
- consent (for you to receive marketing from other organisations).

#### TO KEEP OUR SERVICES UP AND RUNNING

We use your personal data 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**.

We also use your personal data 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.

HERE'S AN EXAMPLE OF HOW WE USE YOUR PERSONAL DATA TO RUN OUR SERVICES

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.

Our legal basis is one or more of the following:

- 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); or
- consent (where required by law).

#### **HELPING WITH SOCIAL INTERACTIONS**

We use your personal data to help social interactions through our services or to add extra functions in order to provide a better experience.

#### HERE'S AN EXAMPLE OF HOW WE USE YOUR PERSONAL DATA FOR SOCIAL INTERACTIONS

We'll let you know if any Revolut customers are in the same area as you (if you and they have location services switched on).

If you give us permission, we'll use the contacts list on your phone, so you can easily make payments to your contacts using the Revolut app or upload photos to your savings vaults in the Revolut app.

Our legal basis is one or more of the following:

- legitimate interests (to develop our products and services and to be efficient in meeting our obligations); or
- consent (to access information held on your phone (for example, contacts in your contacts list), to track you when you have location services switched on).

#### **PROVIDING LOCATION-BASED SERVICES**

We use your personal data to provide relevant advertising to you (for example, information on nearby merchants), to protect against fraud, and to let you know when any of your contacts who are Revolut customers are in the same area as you (if they have location services switched on).

#### HERE'S AN EXAMPLE OF HOW WE USE YOUR LOCATION INFORMATION

If you go abroad, the Revolut app may automatically tell you the exchange rate in that country. Our legal basis is one or more of the following:

- keeping to contracts and agreements between you and us;
- legitimate interests (to develop and market our obligations and keep to regulations that apply to us); or
- consent (to track you when you have location services switched on).

#### PREPARING ANONYMISED STATISTICAL DATASETS

We prepare anonymised statistical datasets about our customers' spending patterns for forecasting purposes or to help governments in policy-making. 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. Anonymised statistical data cannot be linked back to you as an individual.

Our legal basis is:

- legitimate interests (to conduct research and analysis, including to produce statistical research and reports); or
- legal obligations.

#### HERE'S AN EXAMPLE OF WHY WE MAY ANONYMISE YOUR PERSONAL DATA

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

#### MEETING OUR LEGAL OBLIGATIONS, ENFORCING OUR RIGHTS AND OTHER LEGAL USES

We may need to share personal data about you:

- with other organisations (for example, fraud-prevention agencies);
- if this is necessary to meet our legal obligations or in connection with legal claims; or
- to help detect or prevent crime.

You can find out more in the **Do you share my personal data with anyone else?** section below. Our legal basis is one or more of the following:

- legitimate interests (to keep to laws and regulations that apply to us);
- substantial public interest (if we process your sensitive personal data to keep to legal requirements that apply to us); or
- legal obligations.

## 6. Do you make automated decisions about me?

Depending on the Revolut 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. 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:

#### Approving credit applications:

- credit and affordability checks to see whether we can accept your credit application; or
- setting credit limits.

#### **Opening accounts**

- anti-money laundering and sanctions checks; and
- 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 and agreements between you and us; or
- legal obligations.

## 7. Do you carry out credit checks about me?

We and our lending partners will use credit-reference agencies (or other providers of credit information in relevant countries) to carry out credit checks on you if you apply (or tell us you want to apply) for a credit product through Revolut.

We will also share your personal data with credit-reference agencies (or other providers of credit information) to:

- confirm details you have provided when you apply for products or services;
- make an assessment about whether to accept your credit application; or
- determine an appropriate credit limit for you.

When you enter into a credit agreement with us we may continue sharing information with credit reference agencies or other providers of credit information (for example, information

about your repayments and whether you repay in full or on time).

The personal data we share with and receive from credit reference agencies (or other providers of credit information) when you apply for, or use, a Revolut credit product will vary depending on the country you live in. We will provide full details when you apply for a Revolut credit product. **For UK users only** 

If you are located in the United Kingdom, we may also check your credit history to help us develop and, in the future, offer credit products that meet the needs of our customers. This will enable us to pre-filter the credit products that you may be eligible for and, in some cases, let you know before you apply if you will be accepted for a Revolut credit product.

However, if you would prefer that we do not use your data in this way you can use the privacy settings in the Revolut app to opt out.

Credit-reference agencies will not store any of your information that we send them when we use their services for this purpose and these checks do not leave any 'footprint' (trace) whatsoever on your credit record held by the credit-reference agency.

The three main credit-reference agencies Revolut uses are:

- TransUnion (www.transunion.com);
- Equifax (www.equifax.com); and
- Experian (www.experian.com).

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 take out a credit product with us); or
- legitimate interests (to develop and, in the future, offer credit products to our customers).

## 8. How do you use my information for marketing?

If you sign up to our services, and where allowed by law, we will assume you want us to contact you by post, email and SMS text message with information about Revolut products, services, offers and promotions. We may use the personal data we have collected about you in order to tailor our offers to you.

You can adjust your preferences, or tell us you don't want to hear from us, at any time. Just use the privacy settings in the Revolut 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 of companies for their marketing purposes without your permission. You can find out more in the **Do you share** 

my personal data with anyone else? section.

# Your rights

## 9. What are my rights?

The information below explains what rights you have and what those rights mean.

#### You have the right to be told about how we use your personal data

We provide this privacy policy to explain how we use 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; or
- 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 where you ask us to delete it (we've explained this in more detail below). If you've closed your Revolut account, 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 information.

#### You can object to us processing your personal data for marketing purposes

You can tell us to stop using your personal data 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 in order to provide our services, we may need to close your 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 the information, but you want us to continue holding it for you in connection with a legal claim; or
- 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

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 changing your privacy settings in the Revolut app or sending an email to **dpo@revolut.com**.

(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 will 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).

## 10. How do I exercise my rights?

To exercise any of your rights set out in the previous section, you can contact us through the Revolut app or 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.

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 are unhappy with how we have handled your personal data you can complain to your local data protection authority. In the United Kingdom, this is the ICO (**website**). In the EU, there are national and regional data protection authorities (a list is available on this **website**).

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

#### **REVOLUT GROUP COMPANIES**

We share your personal data within the Revolut group of companies in order to provide you with the best service.

#### **OTHER REVOLUT CUSTOMERS**

We will ask you to let us sync your mobile phone contacts. This will help you to identify which of your trusted mobile phone contacts are Revolut customers. Your 'trusted contacts' will also be able to see if you are a Revolut customer through our 'Payment with Friends' functionality.

'Payment with Friends' gives you access to Revolut features like requesting money from your friends, splitting bills, group vaults and paying other Revolut customers near you.

We use technological safeguards to ensure a 'trusted contact' is somebody you already know and who knows you (for example, you have each other saved in each other's mobile phone contacts lists or have already received or given money through a peer-to-peer payment with them).

Both you and your trusted contact must have synced your mobile phone contacts lists with Revolut to be viewable to each other in the Revolut app.

We only show your basic contact details in the Revolut app to your trusted contacts who are also Revolut customers (for example, your name (as saved in your friend's contacts list), mobile phone number, Revolut username, your Revolut profile photo (if you have one)).

You can, of course, choose not to sync your contacts list with Revolut. This means that you will not be able to identify which of your mobile phone contacts are Revolut customers.

You can also turn off 'Payments with Friends' through the privacy settings in the Revolut app. **PEOPLE OR COMPANIES THAT YOU TRANSFER MONEY TO** 

Where you make a payment from your Revolut account, we will provide the recipient with your details (for example, your full legal name and IBAN).

#### SUPPLIERS

The information below explains which suppliers we normally share your personal data with and why.

<u>Suppliers who provide us with IT, payment and delivery services</u> 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.

Card manufacturing, personalisation and delivery companies

To create and deliver your personalised Revolut Card.

<u>Analytics providers and search information providers</u> To help us improve our website or app. <u>Customer-service providers, survey providers and developers</u> To help us to provide our services to you. <u>Communications services providers</u> To help us send you emails, push notifications and text messages.

#### Debt collection agencies

To manage and recover debts that you owe or may become owing if you have a Revolut credit product.

#### THIRD PARTY PAYERS

We may share your name with third parties that pay money into your Revolut account. This is necessary to confirm that the payment has been made to the correct account.

#### PARTNERS WHO HELP TO PROVIDE OUR SERVICES

We may share your personal data with our partners in order to provide you with certain services you have asked us for (for example, when we offer overseas medical insurance as part of our Premium or Metal plans).

If you are a Revolut Business customer, we may share your personal data with our partners (through the Revolut Business API) when you switch this function on through Revolut Connect. HERE'S AN EXAMPLE OF WHEN WE MIGHT SHARE YOUR PERSONAL DATA WITH OUR PARTNERS

If you have asked for insurance services, we will share your relevant personal data with the provider of our insurance services. The service provider will require your personal data to provide you with insurance.

We will only share your personal data in this way if you have asked for the relevant service or it is provided as part of one of our plans.

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

Our partners will have their own privacy policies explaining how they use your personal data. It's important that you read those privacy policies as well. For example, our third party insurance provider, White Horse Ireland dac, will process your personal data in accordance with its own **privacy policy**.

#### **CREDIT-REFERENCE AGENCIES**

As set out in the **Do you carry out credit checks about me?** section, if you apply for a credit product, we'll share your personal data with credit-reference agencies to check whether you are likely to make repayments when due.

#### **OTHER FINANCIAL INSTITUTIONS**

We may share your personal data with other financial institutions if requested.

### HERE'S AN EXAMPLE OF WHEN WE MIGHT SHARE YOUR PERSONAL DATA WITH OTHER FINANCIAL INSTITUTIONS

If you have activated 'Open Banking' through an account you hold with another financial institution and given them permission, we will share data from your Revolut account with that financial institution.

We may also share your personal data with other financial institutions where you do not ask us to. For example:

- if you make an outbound payment, we share information about you alongside your payment. This is because we, like all payment institutions, are required by law to include certain information with payments; and
- if a payment is made to your account by mistake, we can share your information with the financial institution the payment came from. This will help the payer and the other financial institution to try and get the payment back themselves.

#### FOR LEGAL REASONS

We also share your personal data with fraud-prevention agencies to check your identity, protect against fraud, keep to anti-money laundering laws and confirm that you are eligible to use our products and services.

# HERE'S AN EXAMPLE OF WHEN WE MIGHT SHARE YOUR PERSONAL DATA FOR LEGAL REASONS

If you give us false or inaccurate personal data and we identify fraud, we will let fraudprevention agencies know. Law-enforcement agencies may check and use this personal data. If fraud is detected, you could be refused certain services, finance or employment. You can contact us through the Revolut app to ask us for details of the fraud-prevention agencies we may share your personal data with.

We may also need to share your personal data with other third party organisations:

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

#### SOCIAL MEDIA AND ADVERTISING COMPANIES

#### HERE'S AN EXAMPLE OF WHEN WE MIGHT SHARE YOUR PERSONAL DATA FOR ADVERTISING PURPOSES

We may share your personal data (your name, email address and app events) with our advertising partners in the ways described below, but the personal data is hashed before we send it, and the social-media platform we share it with is only allowed to use that hashed personal data in the ways described below.

When we use social media for marketing purposes, your personal data 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 personal data to send our adverts to you, because we think that you might be interested in a new Revolut product or service;
- not send you our adverts, because the marketing relates to a service that you already use; or
- send our adverts 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 socialmedia profile, we may ask our advertising partner or social-media partner to send our adverts for that service to those people).

An example of how we may use social media for marketing purposes is through Facebook's 'Custom Audience' tool, the terms of which are available **here**.

Our legal basis is:

• legitimate interests.

You can contact us at any time, either through the Revolut app or by emailing **dpo@revolut.com**, if you do not want us to share your personal data for advertising purposes. You can also use the privacy settings in the Revolut app to opt out from having your personal data shared in this way.

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, accountant or family member or guardian under a power of attorney).

## **Revolut and your personal data**

## 12. Will my information 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.

For example, if you ask to make an international payment, we will send funds to banks outside of the United Kingdom or EEA. We might also send your personal data outside of the United Kingdom or EEA to keep to global legal and regulatory requirements, and to provide ongoing support services.

We may share your personal data with credit-reference agencies and fraud-prevention agencies that are based outside of the United Kingdom or EEA.

We will take all reasonable steps to make sure that your personal data is handled securely and in line with this privacy policy and data protection laws.

If you would like more information, please contact us through the Revolut app or 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 physical and technical measures to keep your personal data safe and prevent unauthorised access to, or use or disclosure of it. Electronic data and databases are stored on secure computer systems with control over access to information using both physical and electronic means. Our staff receives data protection and information security training. We have detailed security and data protection policies which staff are required to follow when they handle 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 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 for the Revolut app or our website, you will need to keep this password confidential. Please do not share it with anyone.

When you use our 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 generally keep your personal data for six years after our business relationship with you ends or such period as may be required by applicable local laws. However, if you receive services from our Lithuanian group companies, Revolut Bank UAB or Revolut Payments UAB, we will keep your personal data for eight years after our business relationship with you ends.

We are required to keep your personal data for this long by anti-money laundering and e-money laws. We may keep your personal data for longer because of a potential or ongoing court claim or another legal reason.

## 15. How will you keep me updated on how you use my personal data?

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

## 16. Do you use cookies on your websites?

We use cookies to analyse how you use our website. Please read the **Cookies Policy** for more information about cookies.