## The basics

#### 1. About Us

We are Revolut Technologies Inc. We are a corporation incorporated in Delaware and have our registered office at The Corporation Trust Company, 1209 Orange Street, Wilmington, New Castle Delaware, DE, 19801. Our US headquarters in based in New York City.

#### WE ARE COMMITTED TO PROTECTING AND RESPECTING YOUR PRIVACY.

We will:

- · always keep your information safe and private;
- never sell your information; and
- allow you to manage and review your marketing choices at any time.

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

We will collect your personal information 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 (our services).

Under data protection law, we are what is known as the 'data controller' of your personal information.

#### THIS POLICY CONTAINS IMPORTANT INFORMATION

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

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

## Your personal information

## 3. What information do you collect about me?

WE COLLECT DIFFERENT TYPES OF INFORMATION FROM YOU AND OTHERS

The list below explains what personal information 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 username, password and other registration information;
- details of your bank account, including the account number, sort code and IBAN;
- details of your debit cards and credit cards, including the card number, expiration date and
   CVC (the last three digits of the number on the back of the card);
- identification documents (for example, your passport or driving license number), copies of
  any documents you have provided for identification purposes, a personal description and
  photograph of you, and any other information you provide to prove you are eligible to use our
  services;
- · records of our discussions, if you contact us or we contact you; and
- your photo (only if you upload one).
- 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 and so on;
- 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, 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;
  and

 information stored on your device, including if you give us access to contact information from your address book, log-in information, photos, videos or other digital content, check-ins (sometimes, we call this content information). The Revolut app will regularly collect this information in order to stay up to date.

## Information about your location

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

#### Information from others

- We collect information from third parties, such as credit reference agencies, fraudprevention agencies and partners who help us to provide our services.
- This includes your credit record, information to help us check your identity, and information relating to your transactions.

#### Information from social media

• If you allow us to, we will collect information such as friends lists from Facebook or similar information from other online accounts. If you've asked us to, we'll use your Facebook profile to confirm your identity as part of our know-your-client (KYC) process, (which is the process of how we verify you as a customer).

#### **BUSINESS CUSTOMERS**

- If you are a business user, we will need to confirm your identity as part of our KYC process. We will ask you to provide information documents, and will also collect information from third parties, such as commercial registers, for this purpose.
- We may also collect any of the above information relating to your use of the Revolut Dashboard, the Revolut app and our website.

## 4. What is your legal basis for using my information?

We must have a legal basis (a valid legal reason) for using your personal information. Our legal basis will be one of the following.

## Keeping to our contracts and agreements with you

• We need certain personal information to provide our services and cannot provide them without this information.

## Legal obligations

• In some cases, we have a legal responsibility to collect and store your personal information (for example, under money-laundering laws we must hold certain information about our customers).

#### Legitimate interests

 We sometimes collect and use your personal information, or share it with other organizations, because we or they have a legitimate reason to have it and this is reasonable when balanced against your right to privacy.

#### Consent

 Where you've agreed to us collecting your information, for example by using the Revolut app or when you have ticked a box to indicate you are happy for us to use your personal information in a certain way.

We have explained more about how we use your personal information in the How do you use my information? section below.

## 5. How do you use my information?

We collect your information 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 information 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 information 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 money you hold in your Revolut account, we'll
  use your personal information to help us do that.
- We also use your personal information to give you details of our products and services.
- We also use your personal information to contact you by phone and provide you with customer support services. We may record these calls, but only for internal training and quality-control purposes.

#### The types of information we use are:

- information you have given us; and
- information from third parties (as explained in the What information do you collect about me? section above).

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

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

## Our legal basis would be one or more of the following:

- keeping to contracts and agreements between you and us;
- legitimate interests (we will be efficient about how we meet our obligations and we want to provide you with a good service); and/or
- legal obligations.

#### •

We use your personal information to check your identity to protect against fraud, comply
with financial crime 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.

## The types of information we use are:

- information you have provided;
- information from your device;
- location information; and/or
- information from third parties.

## HERE'S AN EXAMPLE OF HOW WE USE YOUR PERSONAL INFORMATION 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 US, but your Revolut Card is being used in Spain, we may determine not process that transaction.

## Our legal basis would be 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); and/or
- legal obligations.

## Marketing and providing new products and services that might interest you

We use your personal information to do the following:

- provide you with information about other goods and services we offer that are similar to those you have already used or asked about;
- provide you with information about our goods or services, and our partner's promotions or
  offers, which we think you might be interested in. To help us do so, we may use information
  we hold about you in order to better understand your interests. You can opt out of this by
  using the in-app help service or by emailing our Data Protection Officer at the address given
  above;
- if you agree, allow our partners and other organizations to provide you with information about their goods or services;
- measure or understand the effectiveness of our advertising, and provide relevant advertising to you; or
- 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).

## The types of information we use are:

information you have provided;

- information from your device;
- location information; and/or
- information from third parties.

HERE'S AN EXAMPLE OF HOW WE USE YOUR PERSONAL INFORMATION FOR MARKETING If you are a Revolut customer, we may contact you about optional extras or promotional offers. We may use information we gather about you through your use of our services to tailor these offers to you.

## Our legal basis would be one or both 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); and/or
- consent (for you to receive marketing from other organizations).

## To keep our services up and running

- We use your personal information 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 information 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.

## The types of information we use are:

- information you have provided; and/or
- information from your device.

## HERE'S AN EXAMPLE OF HOW WE USE YOUR PERSONAL INFORMATION 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.
- The legal basis would be one or both of the following:
   keeping to contracts and agreements between you and us; and/or
- legitimate interests (to be efficient about how we meet our obligations and keep to regulations that apply to us).

## **Helping with social interactions**

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

## The types of information we use are:

- information you have provided;
- information from your device; and/or

location information.

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

- We'll let you know if any of your contacts who are Revolut customers have used our products, upgrades or features or are in the same area as you (if they have location services switched on).
- If you have the relevant settings in the Revolut app switched on, we'll use the contact list on your phone, or your photo gallery, so you can easily make payments to your contacts and send photos with the Revolut app.
- The legal basis would be one or both of the following:
- legitimate interests (to develop our products and services and to be efficient in meeting our obligations); and/or
- consent (to track you when you have location services switched on).
- Providing location-based services

#### **Advertising**

 We use your information 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).

## The types of information we use are:

- information you have provided; and
- location information.

#### 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.

## The legal basis would be 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); and/or
- consent (to track you when you have location services switched on).

## Meeting our legal obligations, enforcing our rights and other legal uses

We may need to share information about you:

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

You can find out more in the Do you share my information with anyone else? section below. The types of information we may share include:

- information you have provided;
- information from your device;
- location information;
- information from third parties; and/or
- social media information.

## Our legal basis would be one or more of the following:

- legitimate interests (to keep to laws and regulations that apply to us);
- legal obligations; and/or
- consent (for you to receive marketing from other organizations).

# 6. Do you carry out credit checks or make any automated decisions about me?

WE WILL CARRY OUT A CREDIT CHECK IF YOU APPLY FOR A CREDIT PRODUCT
We (and our lending partners) use credit-reference agencies to carry out credit checks on you.
This means that when you apply for credit products, or we suggest credit products to you

through the Revolut app, we can better understand your financial circumstances and repayment history, and can tailor our credit products to your needs.

Some of the searches leave a 'soft footprint' on your credit history. This means that the search will be registered on your credit file but will not be visible to others if they search your credit history. (Basically, you will be able to see this footprint but other people won't - see here for more information.) A soft footprint will not affect your credit rating. If you apply for credit, we will provide more information about this in the application form.

Some of our third-party providers, such as fraud-prevention agencies, may also use credit-reference agencies to help us check your identity and prevent fraud. These searches also only leave a trace on your credit history.

We do not accept joint account holders, but credit-reference agencies may sometimes link your credit record with that of anyone else who is financially connected to you.

Due to the international nature of our services, we use credit-reference agencies and fraudprevention agencies in the US and overseas.

Sometimes you may have a right to see your personal records held by credit-reference and fraud-prevention agencies. If you would like details of the credit-reference and fraud-prevention agencies we use, please contact us through the Revolut app or by sending an email to dpo@revolut.com.

You can withdraw your permission for credit checks by contacting us through the Revolut app.

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

If you sign up to our services, we will assume you want us to contact you by post, email and phone (including text message) with offers and promotions. We may use the information 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' section within the 'Profile' section of 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 organizations outside the Revolut group of companies for their marketing purposes without your permission. You can find out more in the Do you share my information with anyone else? section.

## Your rights

## 8. What are my rights?

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

• We provide this privacy notice to explain how we use your personal information.

You can ask to see the personal information we hold about you (this is called making a data subject access request, or DSAR for short).

You can also ask for information about what information we process and why. If you make a
DSAR, we will provide a copy of the personal information we hold about you. We can give
you any information about other people, information which is linked to an ongoing criminal or
fraud investigation, or information 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 information if you think it's wrong.

 You can have incomplete or inaccurate information corrected. Before we update your file, we may need to check the accuracy of the new information you have provided.

You can ask us to delete your personal information.

You can ask us to delete your personal information if:

- There's no good reason for us to continue using it;
- You gave us consent to use the information and you have now withdrawn that consent;
- You have objected to us using the information;
- We have used the information unlawfully; or
- The law requires us to delete the information.

Just to let you know, we may not be able to agree to your request. We will keep certain customer information for at least six years (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 information for marketing purposes.

You can tell us to stop using your personal information for marketing.

You can object to us processing other information (if we are using it for legitimate interests).

• If our legal basis for using your personal information 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 the information (for example, legal reasons), we will not accept your request.
- If you object to us using information 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.
- For example, if you object to us sending your personal information to our partners such as concierge providers (as part of our Premium and Metal plans), we may no longer be able to provide you with those concierge services.

## You can ask us to restrict how we use your personal information.

You can ask us to suspend using your personal information if:

- · You want us to investigate whether it is accurate;
- Our use of the information 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 information (see above), but we need to check whether
  we have an overriding reason to use it.

#### You can ask us to transfer personal information to you.

• If we can, and are allowed to do so under regulatory requirements, we will provide your personal information 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 information, you can withdraw your consent at any time by changing your 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 information up to the point you withdrew your permission).

## 9. 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.

Revolut will verify your identity before it fulfills your request. We may do that in different ways:

- We may require government-issued identification documents and a recent photograph.
- You may also be required to verify your email address.
- Before Revolut can produce personal Information, Revolut may ask you to submit a signed declaration attesting to your identity under penalty of perjury.
- Depending on your existing relationship with Revolut, Revolut may ask you to provide identifying information you previously provided to Revolut for verification.
- You can designate an authorized agent to make a request on your behalf. Revolut will ask you to provide a written authorization or power of attorney. Please reach out to dpo@revolut.com to process an authorization.

Revolut will not discriminate against you in any way because you exercise any rights conferred by this Privacy Notice.

If you are unhappy with how we have handled your personal information you can file a formal complaint by sending us an email to complaints.us@revolut.com.

## 10. Do you share my information with anyone else?

#### **REVOLUT GROUP COMPANIES**

- We share your personal information within the Revolut group of companies in order to provide you with the best service.
- For example, we may share your information with Revolut Ltd, in order to provide you with customer support services.

#### **OTHER REVOLUT CUSTOMERS**

- Certain Services on the Revolut platform will connect you with other customers. For
  example, '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.
  In order to provide you with these services, we may 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.
- 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.

#### **SUPPLIERS**

The list below explains which suppliers we normally share your personal information with. Suppliers who provide us with IT, payment and delivery services

• To help us provide our services to you

## <u>Our banking and financial services partners and payments networks, including Visa and Mastercard</u>

• To help us provide our services to you - this includes banking and lending partners, banking intermediaries and international payment service providers

## <u>Card manufacturing, personalization and delivery companies</u>

To create and deliver your personalized Revolut Card

#### Advertisers

• To promote our services (we provide anonymous information only - for example, 500 men under 30 clicked on their advertisement)

## Analytics providers and search information providers

• To help us improve our website

## <u>Customer service providers, survey providers and developers</u>

• To help us to provide our services to you

## Communications services providers

• To help us send you emails, push notifications and text messages

#### PARTNERS WHO HELP TO PROVIDE OUR SERVICES

We may share your personal information with our partners in order to provide you with certain services you have asked us for.

If you are a business customer, we may share your personal information with our integrated partners (via the Revolut for Business API) when you switch this function on through Revolut Connect.

## HERE'S AN EXAMPLE OF WHEN WE MIGHT SHARE YOUR INFORMATION WITH OUR PARTNERS

If you have asked for concierge services, we will share relevant information to the provider of the concierge service.

We will only share your personal information in this way if you have asked for the relevant service. You can withdraw your permission at any time by contacting us through the Revolut app. However, this may affect your ability to continue to use those services.

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 information with those partners. We will always get your consent before sharing your information for these purposes. You can withdraw your consent at any time by contacting us through the Revolut app.

Our partners will have their own privacy notice explaining how they use your personal information. It's important that you read those privacy notices as well.

## **CREDIT-REFERENCE AGENCIES**

If you apply for a credit product, we'll share your personal information with credit-reference agencies to check whether you are likely to make repayments when due.

#### **FOR LEGAL REASONS**

We also share your personal information 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 INFORMATION FOR LEGAL REASONS

If you give us false or inaccurate information and we identify fraud, we will let fraud-prevention agencies know. Law-enforcement agencies may check and use this information.

If fraud is detected, you could be refused certain services, finance or employment. You can contact us through the Revolut app to ask for more details of how your information will be used by us and these fraud-prevention agencies.

Some fraud-prevention agencies have created a document to explain how they use and share your information - you can see this here.

We may also need to share your personal information with other third-party organizations:

- 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.

Revolut does not sell your personal information to third parties. Revolut has both used third parties to collect personal information and has disclosed personal information to third parties to accomplish the business purposes described above.

## **Revolut & your personal information**

## 11. Will my information go outside the United States?

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

For example, if you ask to make an international payment, we will send funds to banks overseas. We might also send your information overseas to keep to global legal and regulatory requirements, and to provide ongoing support services.

We may share your personal information with credit-reference agencies and fraud-prevention agencies outside the US. (You can read more about this in the Do you carry out credit checks or any make any automated decisions about me? section above).

We will take all reasonable steps to make sure that your personal information is handled securely and in line with this privacy notice 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.

## 12. How do you protect my personal information?

- We store your information on our secure servers.
- Any payment transactions carried out by us or our payment-processing providers will be encrypted using Secured Sockets Layer technology or a secure virtual private network.
- 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.
- Unfortunately, providing information online is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee that all information you provide through the Revolut app or our website will be secure. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.
- When you use our services, which include social networking, chat room or forum features, do not share any personal information that you don't want to be seen, collected or used by

other users, as this information will become publicly available.

## 13. How long will you keep my personal information for?

Under anti-money laundering laws we will hold information about you and your transactions for five years.

You have the right to redeem your e-money for up to six years after your Revolut account is closed. We will therefore hold your information for this long.

Generally, we will not hold your personal information for more than six years after our business relationship with you has ended, unless we need to hold it for longer because of a potential or ongoing claim or another legal reason.

## 14. How will you keep me updated on how you use my information?

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

## 15. Cookies

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

To download this page, press "command + p" (on a Mac operating system), and "control + p" (on a Windows operating system).

## **Children privacy - The basics**

## 16. About Revolut Junior

Revolut Junior is a sub-account of your Revolut personal account for your child(ren). Revolut Junior is a great way for your child(ren) to pay for things and learn how to use money.

## 17. How do we protect the privacy of data of children?

In order to protect the privacy of data for both the parent(s) and child(ren), we adopted and followed the guidelines and rules laid down by the Children's Online Privacy Protection Act ('COPPA'). COPPA requires us to notify parents or legal guardians and get their verifiable parental consent before we collect, use or disclose personal information of children under the age of 13.

We do not knowingly collect "personal information," as defined below under COPPA, directly from users under the age of 13, except as described below. If the primary account holder creates a sub-account for a child under the age of 13, only the primary account holder (i.e., the parent or legal guardian), provides information to us necessary to establish the sub-account for the child.

PERSONAL INFORMATION UNDER COPPA

Personal information means individually identifiable information about an individual collected online, including— (A) a first and last name; (B) a home or other physical address including street name and name of a city or town; (C) an e-mail address; (D) a telephone number; (E) a Social Security number; (F) any other identifier that the Federal Trade Commission determines permits the physical or online contacting of a specific individual; or (G) information concerning the child or the parents of that child that the website collects online from the child and combines with an identifier described in this paragraph.

## 18. What information are we collecting from you about your child(ren)?

## We may collect the following information:

the child's name, address and date of birth;

email address, phone number and details of the device they use (for example, the child's phone number);

your username, password and other registration information

identification documents (for example, the child's passport or driving license number (if applicable)), copies of any documents you have provided for identification purposes, a personal description and photograph of the child, and any other information you provide to prove they are eligible to use our services; and

records of our discussions, if you contact us or we contact you.

19. How do we use the collected information of your child(ren)?

We may use your child(ren)'s data so we can do the following:

- Send them a welcome pack and information like tips on how to use their account to save money
- Make sure it is the child using the account
- Make sure we give them important news and other information they need to know about
- Protect their account by making sure they are at the same place as their card is being used
- Reply to the parent, legal guardian, or child when they contact us, or answer any questions they may ask us
- Find out what the child likes and doesn't like about Revolut Junior so we can make it better for them
- Make sure we don't break the law. To do this, we'll share information with the police or other important people when we need to. They will investigate when something has gone wrong and make sure we're doing everything right to protect them.

# 20. Are there any exceptions to collecting information from my child(ren) without verifiable parental content?

There are some limited exceptions that allow us to collect information without verifiable parental consent.

• Collecting a child's contact information solely to directly respond to the child's request on a one-time basis. We will not use that information to re-contact the child for any other

purpose

- Collecting a child's contact information and the contact information of their parent or legal guardian to directly respond more than once to a specific request from the child. We will not use the child's personal information to re-contact the child for any other purpose;
- To protect the security and integrity of our app
- To respond to judicial process or provide information to law enforcement
- When providing support for the internal operations of our app which include: maintaining
  and analyzing the functioning of our app; performing network communications;
  authenticating users; personalizing content on the app; serving contextual advertising or
  capping the frequency of advertising; protecting the security or integrity of the user
- To ensure legal and regulatory compliance.

# 21. How do I exercise my right to review the information provided by my child(ren)?

Upon written request, COPPA requires us to provide you with a description of the specific types of personal information collected from your child(ren) such as name, address, telephone number, email address, hobbies, and extracurricular activities. To make sure you (i.e. the parent or legal guardian) are actually making this request, we may ask for additional information before disclosing the personal information collected from your child(ren).

You also have the right to stop us from future use or future collection of personal information from your child(ren). You may ask us to delete the child's personal information. See section on How long we will keep your child(ren)'s personal information for.

## 22. How long will we keep your child(ren)'s personal information for?

We need to keep your child's data while their Revolut Junior account is active.

We may need to keep your data for longer if the law says we have to. So even if you ask us to destroy your data, we may not be able to do that straight away.

If you close your account, we'll keep your data for up to six years. We may need to keep it even longer if we need to use it in a court case because some person or company says that we have broken the law, but we don't think we have.

## 23. What to do if you have any questions or want to know more?

#### Get in touch!

If you have any questions about your child(ren)'s data, email us at dpo-junior@revolut.com. This Policy was last updated on October 6, 2020.