

# **\*\*PRIVACY NOTICE\*\***

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## **\*\*ABOUT THIS NOTICE\*\***

This Privacy Notice (Notice”) applies to Remitly’s website at [remitly.com](https://www.remitly.com), the Remitly mobile app, and any other Remitly-owned websites, applications, or programs that link to this Notice. **To find answers to common privacy related questions including an overview of our privacy practices and your privacy rights, please visit our [Privacy Help Center](https://www.remitly.com/help/article/06b7299f-0ba6-4dd5-b33b-8f6a82edda65).**

This Notice, together with our Cookie Policy and applicable Service Agreement(s), including but not limited to the Remitly [User Agreement](https://www.remitly.com/jp/en/home/agreement) apply to your use of our Services.

Where we use other capitalized words and phrases in this Notice (such as Agreement, Account, Profile, Services and Transaction), these have the same meaning as given to

them in the applicable User Agreement, unless we have defined them differently in this Notice.

## **\*\*DATA PRIVACY FRAMEWORK NOTICE\*\***

Remitly complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF (UK Extension), and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF), as set forth by the U.S. Department of Commerce (collectively, the “DPF”).

This DPF certification covers Remitly, Inc. (U.S.), as well as the following U.S.-based covered entities and U.S. subsidiaries:

- Remitly Global Operations, Inc.
- Remitly Global, Inc.
- Remitly Holdings, Inc.
- Remitly ADV, Inc.
- Remitly LS, Inc.
- Remitly Services Holdings, Inc.

We have certified to the U.S. Department of Commerce that we adhere to the DPF Principles with respect to personal data received from the European Union, United Kingdom, and Switzerland in reliance on the relevant framework. To learn more about the Data Privacy Framework (“DPF”) program, and to view our certification, please visit: [[www.dataprivacyframework.gov](http://www.dataprivacyframework.gov)](<https://www.dataprivacyframework.gov/>).

The Federal Trade Commission (FTC) has jurisdiction over our DPF compliance. In certain cases, we may be required to disclose personal data in response to lawful requests from public authorities, including to meet national security or law enforcement obligations as outlined in this policy.

We remain accountable for the processing of personal data we receive under the DPF and subsequently transfer to third-party agents on our behalf. We comply with the DPF’s onward transfer requirements, including liability provisions.

For unresolved privacy complaints related to personal data processed under the DPF ( HR data and non-HR data), Remitly cooperates with the EU Data Protection Authorities (DPAs), the UK Information Commissioner’s Office (ICO), and the Swiss Federal Data Protection and Information Commissioner (FDPIC), as applicable. This independent recourse mechanism is offered free of charge. If a complaint is not resolved through

these channels, under certain conditions, you may invoke binding arbitration as outlined under the official DPF website.

## **NOTICE TO CALIFORNIA, TENNESSEE, MINNESOTA, MARYLAND, INDIANA, KENTUCKY AND, RHODE ISLAND RESIDENTS**

Notice at Collection of personal information: We list the categories of personal information that we collect below under "What Personal Data Do We Collect?" We collect personal information about you for business and commercial purposes as described below under "How Do We Use or Process Your Personal Data?" For more information, including how to opt-out of the sale or sharing of personal information, please see "Region Specific Privacy Terms" section below.

### **\*\*WHO ARE WE?\*\***

Any personal data provided to or gathered by our Services is controlled by the applicable Remitly affiliate based upon your country of residence. See the table in the "Our Relationship with You" section of this Notice to determine which entity controls the collection and use of your personal data.

### **\*\*WHAT PERSONAL DATA DO WE COLLECT?\*\***

The personal data that we collect from you depends on how you interact with us and our products and services. When we say "personal data" or "personal information" we mean any information related to an identified or identifiable natural person. The following are the categories and specific types of personal data or information we may collect:

**\*Basic Identifying Information\*:** Including your full name (including aliases), postal address, e-mail address, phone number, date of birth, gender, occupation and employer, username or social media handle, or other similar identifiers (including a customer ID auto generated by us to identify you in our systems).

**\*Customer Support Information\*:** Information you give to us when you contact customer services or our offices including call recordings (such as when we record customer service calls for quality assurance).

**\*Government Issued Identification or Records\*:** Including your driver's license, state or country government issued identification card (such as a passport, driver's license, military or immigration identity cards or visas, national identification cards, Japan "My Number" (Individual Number cards)), as well as a picture or recording of yourself with

your identification documentation, records of proof of address (e.g., utility bill, loan or mortgage statement), tax reference number, social security number, or evidence of how you will fund your Transaction (e.g., bank statement or pay slip).

**\*Marketing & Communications Information\*:** Including your preferences to receive marketing from us and our third parties, communication preferences, and information we lawfully receive from market research, advertising networks, or analytics providers.

**\*Payment Information\*:** Including your financial or payment instrument details (either debit/credit card) or bank account details.

**\*Promotions & Competitions Information\*:** Including your name and email address and certain other personal information that you may be asked to provide to participate in promotions or competitions.

**\*Recipient or Authorized User Information\*:** Including your recipient or authorized user's full name, postal address, phone number, depending on the disbursement method selected certain financial institution or financial account details such as bank account or mobile wallet account. If there is a dispute about whether money has been received by your recipient or authorized user, we may ask you for additional information so we can verify their identity with the financial institution.

**\*Remitly Flex Information\*:** Including your transaction history (including a unique transaction reference number), transaction receipts, purpose of the transaction, your average transaction amount, and other information we collect in order to comply with anti-money laundering and know your customer obligations.

**\*Sensitive Personal Data\*:** Including biometric data, mainly face scan information from photos and videos you provide for identity verification purposes and monitoring login activity and your interactions with our site to protect your account and identify suspicious or fraudulent activity. While we do not process your biometric data, our identity verification service provider, Onfido, processes it on our behalf.

**\*Survey & Feedback Information\*:** Including information such as your name, email address or other contact information, responses to surveys, reviews, feedback, testimonials and certain other personal information that you may be asked to provide.

**\*Technical Information\*:** Including the hardware and software you use to access our Services, network information, internet service provider, operating system, the type of browser you use, unique device identifier (e.g. your device's IMEI number, MAC address,

or mobile number), IP address, other similar unique identifiers, your current location (using GPS technology, which some of our location enabled Services require your personal data for this to work).

**\*Transaction Information\*:** Including your transaction history (including a unique Transaction reference number), transaction receipts, purpose of transfers, relationship with the recipient or authorized user, your average transaction amount, how often you use our Services, if you send to multiple recipients or have multiple authorized users, and other information we collect in order to comply with anti-money laundering and know your customer obligations.

**\*Usage Information\*:** Including information on your interactions with our Services or Sites or browsing or search activity.

**For California, Tennessee, Minnesota Maryland, Indiana, Kentucky and, Rhode Island residents,** please note that we may collect **\*Sensitive Personal Information\*** including social security number, driver's license, state identification card, or passport number and **\*Protected Classifications\*** under California, Tennessee, Minnesota, Maryland, Indiana, Kentucky, Rhode Island and federal law, including gender and age.

## **\*\*HOW DO WE COLLECT YOUR PERSONAL DATA?\*\***

We collect personal data about you from various sources. For example, we collect and obtain information:

Directly from you

We collect personal data you provide, such as when you use our Service, create an Account or Profile, contact us (including via chat), respond to a survey, interact with us at events, participate in a sweepstakes, contest, or other similar campaign or promotion, respond to a survey, post a review, or sign up to receive emails, text messages, and/or postal mailings.

Using cookies and other automatic data collection technologies

When you visit our websites, use our app, open or click on emails we send you, or interact with our advertisements, we or third parties we work with automatically collect certain information using technologies such as cookies, web beacons, clear GIF, pixels, internet tags, web server logs, and other data collection tools. For more information, please see our [Cookie Policy](<https://www.remitly.com/jp/en/home/cookies>).

## From Other Sources

We may obtain information about you from other sources, such as data analytics providers, marketing or advertising service providers, social media platforms or networks, fraud prevention or identity verification service providers, electronic databases, credit reporting agencies, vendors that provide services on our behalf, or publicly available sources.

## **\*\*HOW DO WE USE OR PROCESS YOUR PERSONAL DATA?\*\***

We will only use your personal data when the law allows us to. Depending on the country in which you reside, we rely on the following legal bases to process your personal data:

### COMPLY WITH LEGAL OBLIGATIONS

We use your personal data to comply with our legal or regulatory obligations, to establish or exercise our rights, and to defend against a legal claim.

### Security and Fraud Prevention

We use your personal data to detect, investigate, prevent, or take action regarding possible malicious, deceptive, fraudulent, or illegal activity, including fraudulent transactions, attempts to manipulate or violate our policies, procedures, and terms and conditions, security incidents, and harm to the rights, property, or safety of Remitly and our users, customers, employees, or others.

### Comply with Applicable Laws

We use your personal data to comply with applicable laws and regulations, such as those relating to "know-your-customer," anti-money laundering requirements, sanctions legislation, and the various associated regulatory rules and guidance in relation to risk investigation, risk scoring, fraud, counter terrorist financing, consumer protection and complaint handling.

### TO PERFORM A CONTRACT

## To Provide Our Services

We use your personal data when you access or use our Services, including to process your Transaction(s), maintain and manage your account, deliver/fulfill promotional offers or rewards, and process payments.

## Communicating With You

We use your personal data to communicate with you, such as to respond to and/or follow-up on your requests, inquiries, issues or feedback, and to provide customer service.

## CONSENT OR LEGITIMATE INTEREST

### Marketing and Promotional Purposes

We use your personal data for marketing and promotional purposes, such as to send marketing, advertising, and promotional communications by email, text message or postal mail; to show you advertisements for products and/or services tailored to your interests on social media and other websites; and to administer our new customer promotions, sweepstakes, contests, and other similar promotions.

### Analytics and Personalization

We use your personal data to conduct research and analytics, including to improve our services and product offerings; to understand how you interact with our websites, mobile apps, advertisements, and communications with you; to improve our websites, app, and marketing campaigns (business and marketing analytics); to personalize your experience, to save you time when you visit our websites and app, and to customize the marketing and advertising that we show you; to understand how you use our app and website.

### Other Business or Commercial Purposes

At your direction or with your consent, we may process certain personal data to fulfill any other business or commercial purposes.

For additional information on our legal bases for processing your personal data, please

see the section below entitled, "What is our Legal Basis for Processing your Personal Data?".

## **\*\*WHO DO WE SHARE YOUR PERSONAL DATA WITH?\*\***

In addition to the specific situations discussed elsewhere in this privacy notice, we disclose personal data in the following circumstances:

### Corporate Affiliates

We may share personal data with our corporate affiliates, including our parent company, affiliates and subsidiaries. Such corporate affiliates process personal data on our behalf to provide services or in other circumstances with your consent or as permitted or required by law.

### Service Providers

We share certain personal data with third parties that perform services to support our core business functions and internal operations. This includes banks, disbursement providers, or other financial institutions completing your transfer or other financial service request (including payment processors), identity verification or KYC service providers, third parties that provide software and tools to send postal mail, e-mails and text messages, or analyze customer data, provide marketing assistance, administer our reviews, investigate fraudulent activity, conduct customer surveys, and outsourced customer service providers.

### Third Party Partners

We may share your personal data with third parties that we have partnered with to jointly create and offer a product, service, or joint promotion. We may also share your personal data with our banking or distribution partners in the event we suspect you are violating our terms or engaging in fraudulent behavior as it relates to our business. Their use of your information is not governed by this privacy notice, but by their own respective privacy policies.

### Social Media Platforms and Networks

Some of our websites have features such as, plugins, widgets, or other tools made available by third parties that may result in information being collected or shared

between us and the third party. Their use of your information is not governed by this privacy notice, but by their own respective privacy policies.

### Business Transactions

If we become involved with a merger, corporate transaction or another situation involving the transfer of some or all of our business assets, we may share your information with business entities or people involved in the negotiation or transfer.

### Legal Process

We may disclose personal data in response to subpoenas, warrants, court orders, government inquiries or investigations, or to comply with relevant laws and regulations. We may also disclose information to establish, exercise, or protect our rights or the rights of others; to defend against a legal claim; to protect the safety and security of our visitors; to detect and protect against fraud; and to take action regarding possible illegal activities or violations of our policies.

### Other Instances

We may ask if you would like us to share your information with other third parties who are not described elsewhere in this Notice.

### **\*\*WHY DO WE PROCESS SENSITIVE PERSONAL DATA?\*\***

We may ask that you provide biometric data to one of our identity verification providers. Where data protection laws only permit the processing of biometric data with your consent, we will seek your consent prior to the processing.

For example, in order to verify your identity, Remitly uses the services of Onfido. Onfido will check if your identity documents are valid, and also confirm that your selfie photo and/or video matches the photo on the documents and may process your biometric information per [Onfido's Facial Scan and Voice Recording Policy](<https://onfido.com/facial-scan-policy-and-release/>) and [Onfido's Privacy Policy](<https://onfido.com/privacy/>). The results of the check will then be shared with Remitly. Your photo and ID documents will be shared with Onfido for this purpose as well as to allow Onfido to maintain, protect and improve its services.

### **\*\*DO WE MAKE AUTOMATED DECISIONS ABOUT YOU?\*\***

We use automated processes to check that your access to our services and your use of our services meet our required standard, including verifying your identity, and to help prevent fraud or other illegal activities. These processes may make an automated decision to reject your proposed transaction, to block a suspicious attempt to log into your account, or to close your account. If you feel that an automated process may have impacted you, please contact our Privacy team at [privacy@remitle.com](mailto:privacy@remitle.com).

## **\*\*WHAT ARE MY PRIVACY RIGHTS?\*\***

Our customers in certain regions of the world have specific data privacy rights based upon the applicable privacy laws and regulations. We strive to implement the best privacy practices as a standard for all our customers.

### **\*Access Your Data & Data Portability\***

You may request that we provide you a copy of your personal data processed by us. This information will be provided without undue delay subject to certain exceptions or limitations, including if such provision adversely affects the rights and freedoms of others.

### **\*Correct Your Data / Data Rectification\***

You have the right to request that we update and correct inaccuracies in your personal data. You can update certain information related to your account by logging into your account on our site or app, as applicable or otherwise contacting us as described in the Exercising Your Privacy Rights section below.

### **\*Data Deletion/Erasure\***

You may request to erase your personal data, subject to applicable law. If you close your account, we will mark your account in our database as "Closed," but will keep certain account information for a period of time. This is necessary to deter fraud, by ensuring that persons who try to commit fraud will not be able to avoid detection simply by closing their account and opening a new account, and to comply with our legal obligations. However, if you close your account, your personal data will not be used by us for any further purposes, nor shared with third parties, except as necessary to prevent fraud and assist law enforcement, as required by law, or in accordance with this Notice.

### **\*Object to the Processing of Data\***

You have the right to object to us processing or transferring your personal data under certain circumstances. You may object to any processing based on the legitimate interests ground when there is something about your particular situation where you feel processing on this ground impacts your fundamental rights and freedoms.

#### \*Unsubscribe from Direct Marketing\*

You have the right to ask us not to process your personal information for marketing purposes. You can exercise this right at any time by carrying out 'unsubscribe' actions which are made available to you (such as clicking on the 'unsubscribe' link in each promotional email we send you). We will honor your choice and refrain from sending you such communications. Please note that if you ask us not to contact you by email at a certain email address, we will retain a copy of that email address on a "suppression list" in order to comply with your no-contact request. You are free to change your marketing choices at any time.

You may also control how we use some of your personal data as part of our Services (such as how we may communicate with you) by confirming your preferences in your Account. Please note that not all communications can be switched off – for example, we may be required to send you email notices about our Services to comply with our legal obligations under national laws and regulatory guidance.

#### \*Automated Individual Decision-Making, Including Profiling\*

In some jurisdictions, you have the right not to be subject to a decision based solely on automated processing of your personal data, including profiling, which produces legal or similarly significant effects on you, unless there are applicable exceptions under relevant data protection laws. We may reject your request, as permitted by applicable law, including when providing the information would result in a disclosure of a trade secret or would interfere with the prevention or detection of fraud or other crime. However, generally in these circumstances we will verify that the algorithm and source data are functioning as anticipated without error or bias or if required by law to adjust the processing.

#### \*Withdraw Your Consent\*

You have the right to withdraw your consent for us to process data, where our lawful basis for processing is based on that consent. Note that withdrawal of consent does not affect the lawfulness of processing which may have taken place prior to withdrawal

of consent. If you withdraw your consent, we may not be able to provide certain products or services to you.

#### \*US Oregon Residents: List of Third Parties\*

If you are a resident of the state of Oregon, you have the right to obtain, at our option, a list of specific third parties, other than natural persons, to which we have disclosed: (i) your personal data or (ii) any personal data.

#### Exercising Your Privacy Rights

To exercise any of the above privacy rights, please submit a request through one of the following methods:

- Sending us an email at [privacy@remitle.com](mailto:privacy@remitle.com) using the email associated with your Remitle account; or
- [Contacting us](https://www.remitle.com/jp/en/help#contact) via Chat or Phone.

We typically do not charge a fee for exercising your privacy rights, but where permitted by law, we may charge a reasonable fee for requests that are excessive or manifestly unfounded.

#### \*Identity Verification\*

For us to process some requests, we will need to verify your identity to confirm that the request came from you. We may contact you by phone or e-mail to verify your request. If we are unable to contact you or you fail to respond to our requests to identify you, we may be unable to fulfill your request.

### **\*\*HOW DO WE PROTECT YOUR DATA?\*\***

We employ industry accepted technical and organizational measures to protect the information you submit to us. We protect your sensitive personal data such as bank account number, credit card number, date of birth, and government identification number using encryption in transit and encryption at rest. We leverage access controls to limit access to personal data to those with a need to know. We also require the use of security credentials (which may, for example, include a username and password) from each user who wants to access their information on our Site and/or our App.

Where we have given you (or you have chosen) security credentials (such as a password) that enable you to access certain parts of our Service, you are responsible for keeping these details confidential and secure. Moreover, if you allow access to our Services via using your fingerprint on your Device (for example, via Apple Touch ID), then you should not allow any other person to register their fingerprint on that Device as it may allow them access to our Services and you could be held responsible for their actions. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security and any transmission of personal information is at your own risk. If you have any questions about security, you can contact us at [privacy@remitly.com] (mailto:privacy@remitly.com).

This site is protected by [reCAPTCHA Enterprise](https://cloud.google.com/security/products/recaptcha#protect-against-fraud-and-abuse-with-a-modern-fraud-prevention-platform) and the [Google Privacy Policy](https://policies.google.com/privacy) and [Terms of Service](https://policies.google.com/terms) apply.

## **\*\*TRANSFERRING PERSONAL DATA INTERNATIONALLY\*\***

We share your personal data within the Remitly family of products, including Remitly Group entities and subsidiaries, and to external third parties (the categories of which are referred to in this Notice). This may involve transferring your personal data internationally including outside of the country of your residence. Whenever we transfer your personal data internationally we will ensure a similar degree of protection is afforded to it. In some instances, your personal information may be transferred to countries that have been deemed to provide an adequate level of protection for personal data by the applicable data protection authority or government agency (as specified in the Our Relationship With You section below). In other instances, we will ensure at least one of the lawful safeguards are implemented, which may include the use of intra-company agreements, contractual protections, or specific contracts approved (such as standard contractual clauses) by the applicable data protection authority or government agency (as specified in the Our Relationship With You section below), which give personal data the same protection it has in your country of residence.

## **\*\*HOW LONG DO WE RETAIN YOUR DATA?\*\***

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. To determine the appropriate retention period for personal data, we consider the following based upon your country of residence (among other things):

- obligations and/or retention periods imposed on us by applicable laws and/or our regulators
- the amount, nature, and sensitivity of the personal data
- the potential risk of harm from unauthorised use or disclosure of your personal data, and
- the purposes for which we process your personal data and whether we can achieve those purposes through other means.

As a regulated financial institution, we are required by law to store some of your personal and transactional data beyond the closure of your account with us. Please note that by using our Services you expressly agree to us retaining your personal data (including data related to your Transactions and our collection and verification of your identity) for at least 10 years following the end of your legal relationship with us.

## **\*\*CHANGES TO THIS NOTICE\*\***

We may amend this Notice at any time, and whenever we do so we will notify you by posting a revised version on our Site and App. Please review this Notice each time you make a Transaction as it may have been updated since you initially registered for our Services, or since your last Transaction.

If you do not agree with any aspect of this Notice, or any change, you can end your Agreement with us and close your account by emailing us at [privacy@remitle.com] (mailto:privacy@remitle.com) or otherwise [contacting us](https://www.remitle.com/jp/en/help#contact).

## **\*\*LINKS TO THIRD PARTY WEBSITES AND SERVICES\*\***

Parts of our Service use Google Maps services, including the Google Maps API(s). Use of these features is subject to the [Google Maps Additional Terms of Use](https://www.google.com/intl/en-USUS/help/termsmaps.html) and the [Google Privacy Policy] (https://policies.google.com/privacy). By using this Site and the Service you also agree to the Google Terms (as amended from time to time).

Our Site and App includes links to other websites whose privacy practices may differ from those of Remitle.

If you submit personal information to any of those websites, your information is governed by their privacy policies and we do not accept any responsibility or liability for these policies or for any personal information which may be collected and processed

via those websites or services (such as contact and location data). We encourage you to carefully read the privacy policy of any website or software application you use or visit.

This Notice does not cover the practices of third parties that you may engage with when using our Services, such as your mobile network operator or other users of our Services. You should contact the applicable third party about their privacy policy before providing them with any personal information.

## **\*\*CHILDREN\*\***

We ask that persons under the age of 18 (which we treat as children and minors) refrain from using our Services or submitting any personal information to us. Persons under the age of 18 years are not eligible to use our Services and if we discover that someone under the age of 18 has registered an Account or Profile with us, we will close it.

## **\*\*PRIVACY NOTICE TRANSLATION\*\***

This Notice is drafted in the English language and translations may be provided in other languages. You agree that the English version of the Notice will control in the event of any inconsistency between the English and any translated versions in any dispute related to this Notice.

## **\*\*CONTACT AND COMPLAINTS\*\***

If you have any questions, comments, or requests regarding our privacy notice, you may reach out to our Data Protection Officer, John David O'Brien at [DPO@remitly.com](mailto:DPO@remitly.com).

If you feel that we have not addressed your questions or concerns adequately, or you believe that your data protection or privacy rights have been infringed, you can complain to any supervisory authority or other public body with responsibility for enforcing privacy laws, as listed in the section entitled "Our Relationship with You" section.

## **\*\*OUR RELATIONSHIP WITH YOU\*\***

**Customer Residency:** For Australian residents

**Remitly Entity:** Remitly Australia, Pty Ltd

**Registered Office:** King & Wood Mallesons Level 61 Governor Phillip Tower 1 Farrer Place Sydney Nsw 2000 Australia

**Data Protection Authority:** [Office of the Australian Information Commissioner](<https://>

[www.oaic.gov.au/](http://www.oaic.gov.au/))

**Customer Residency:** For Brazilian residents

**Remitly Entity:** Remitly Corretora de Cambio Ltda

**Registered Office:** Av Paulista, 1374 Andar 11 E 12 Esp 12a124 Bela Vista  
Sao Paulo, Brazil  
Cep: 01310-916

**Data Protection Authority:** [National Data Protection Authority (ANPD)](<https://www.gov.br/anpd/pt-br>)

**Customer Residency:** For Canadian residents

**Remitly Entity:** Remitly Canada, Inc.

**Registered Office:** 250 Howe Street, 20th Floor Vancouver, Bc V6c 3r8 Canada

**Data Protection Authority:** [Office of the Privacy Commissioner](<https://www.priv.gc.ca/en/>)

**Customer Residency:** For EEA residents

**Remitly Entity:** Remitly Europe Ltd

**Registered Office:** Ground Floor, 1 Albert Quay, Ballintemple, Cork, Ireland, T12 X8N6

**Data Protection Authority:** [Data Protection Commission (DPC)](<https://www.dataprotection.ie/>)

**Customer Residency:** For Japan residents

**Remitly Entity:** Remitly Japan K.K.

**Registered Office:** Otemachi Bldg 4F, Finolab Otemachi 1-6-1, Chiyoda, Tokyo 100-0004, Japan

**Data Protection Authority:** [Personal Information Protection Commission ](<https://www.ppc.go.jp/en/>)

**Customer Residency:** For New Zealand residents

**Remitly Entity:** Remitly NZ Limited

**Registered Office:** Russell Mcveagh Level 30, Vero Centre 48 Shortland Street Auckland Central 1052 New Zealand

**Data Protection Authority:** [Office of the Privacy Commissioner](<https://privacy.org.nz/>)

**Customer Residency:** For Philippine residents

**Remitly Entity:** Remitly PHL Operations, Inc.

**Registered Office:** Quisumbing Torres 16th Floor, One/NEO Building 26th Street corner 3rd Avenue Crescent Park West, Bonifacio Global City Taguig City, Philippines 1634

**Data Protection Authority:** [National Privacy Commission (NPC)](<https://privacy.gov.ph/>)

**Customer Residency:** For Philippine residents

**Remitly Entity:** Remitly Philippines, Inc.

**Registered Office:** 10/F 8 Rockwell Hildago Corner Plaza Drives Poblacion, City of Makati, 1210, Metro Manila, Philippines

**Data Protection Authority:** [National Privacy Commission (NPC)](<https://privacy.gov.ph/>)

**Customer Residency:** For Singapore residents

**Remitly Entity:** Remitly Singapore Pte. Ltd

**Registered Office:** 38 Beach Road, South Beach Tower, \#29-11 Singapore 189767

**Data Protection Authority:** [Personal Data Protection Commission](<https://www.pdpc.gov.sg/>)

**Customer Residency:** For UAE residents

**Remitly Entity:** Remitly (DIFC) Limited

**Registered Office:** Level 15 Unit Gd-Gb-00-15-Bc-23, Gate District Gate Building Dubai International Financial Centre, Dubai, United Arab Emirates

**Data Protection Authority:** [Commissioner of Data Protection](<https://www.difc.ae/business/registrars-and-commissioners/commissioner-of-data-protection>)

**Customer Residency:** For UK residents

**Remitly Entity:** Remitly U.K. Ltd

**Registered Office:** 90 Whitfield Street, London W1t 4ez, United Kingdom

**Data Protection Authority:** [Information Commissioner's Office (ICO)](<https://www.ico.org.uk/>)

**Customer Residency:** For US residents

**Remitly Entity:** Remitly, Inc.

**Registered Office:** 401 Union Street, Suite 1000, Seattle, WA 98101 USA

**Data Protection Authority:** [Federal Trade Commission (FTC)](<https://www.ftc.gov/>)

**Customer Residency:** For US residents and customers of Remitly Flex

**Remitly Entity:** Remitly ADV, Inc.

**Registered Office:** Cogency Global, Inc. 850 New Burton Rd, Ste 201 Dover, DE 19904

**Data Protection Authority:** [Federal Trade Commission (FTC)](<https://www.ftc.gov/>) && [Consumer Financial Protection Bureau (CFPB)](<https://www.consumerfinance.gov/complaint/>)

## **\*\*WHAT IS OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA?\*\***

**Types of Personal Data:** Basic Identifying Information

**Our Lawful Basis for Processing:** To comply with our legal obligations. If you do not provide this information, you will not be able to make any Transactions. Performance of a contract with you, namely our User Agreement. Necessary for our or a third party's legitimate interests including to: 1\ Collect payment for your use of our Services; 2\ Troubleshoot issues with your account or our Services; 3\ Carry out data, trend, and financial analysis, testing, and Service tracking; 4\ Respond to, handle, and process queries, requests, complaints, applications, and the like; 5\ Seek customer feedback on, and help us to, track, improve, personalize, and develop, our Services, content, and advertising; 6\ Monitor and train our customer service and associated teams; 7\ Give you rewards or incentives for using or recommending our Services; 8\ Conduct business and marketing analytics; 9\ Grow our business and inform our marketing strategy and advertising campaigns; 10\ Collect information that will enable us to understand why and how you interact with us and our Services; 11\ Work with our third party partners so that we and/or they can offer, provide and/or track rewards, incentives and/or the performance of campaigns; 12\ Send you service updates and promotional offers; 13\ Market our Services to you, or conduct market research (provided your marketing and communication preferences in your Account allow us to do this); and, 14\ Exercise legal rights and/or defend claims.

**Types of Personal Data:** Customer Support Information

**Our Lawful Basis for Processing:** To comply with our legal obligations. Necessary for one or more of the legitimate interests set out in "Basic Identifying Information" above. Performance of a contract with you, namely our User Agreement.

**Types of Personal Data:** Government Issued Identification or Records

**Our Lawful Basis for Processing:** To comply with our legal obligations. Performance of

a contract with you, namely our User Agreement. Necessary for one or more of the legitimate interests set out in “Basic Identifying Information” above.

**Types of Personal Data:** Marketing & Communications Information

**Our Lawful Basis for Processing:** Necessary for one or more of the legitimate interests set out in “Basic Identifying Information” above.

**Types of Personal Data:** Payment Information

**Our Lawful Basis for Processing:** To comply with our legal obligations. Necessary for one or more of the legitimate interests namely to collect payment for your use of our Services.

**Types of Personal Data:** Promotions & Competitions Information

**Our Lawful Basis for Processing:** Performance of a contract with you.

**Types of Personal Data:** Recipient or Authorized User Information

**Our Lawful Basis for Processing:** Performance of a contract with you, namely our User Agreement. To comply with our legal obligations.

**Types of Personal Data:** Sensitive Personal Data

**Our Lawful Basis for Processing:** In certain jurisdictions, to comply with our legal obligations we may process sensitive personal data where it is necessary for reasons of substantial public interest namely preventing or detecting unlawful acts, complying with regulatory requirements relating to unlawful acts and dishonesty or responding to suspicion of terrorist financing or money laundering, and rely on this legal basis to help identify and support individuals who may be considered vulnerable customers, where additional safeguards or accommodations are appropriate. Where data protection laws only permit us (or our service providers) to process biometric data with your consent, we will seek your consent prior to the processing.

**Types of Personal Data:** Survey & Feedback Information

**Our Lawful Basis for Processing:** Necessary for one or more of the legitimate interests set out in “Basic Identifying Information” above.

**Types of Personal Data:** Technical Information

**Our Lawful Basis for Processing:** To comply with our legal obligations. Necessary for one or more of the legitimate interests set out in “Basic Identifying Information” above.

**Types of Personal Data:** Transaction Information

**Our Lawful Basis for Processing:** To comply with our legal obligations. Necessary for one or more of the legitimate interests set out in "Basic Identifying Information" above.

**Types of Personal Data:** Usage Information

**Our Lawful Basis for Processing:** Necessary for one or more of the legitimate interests set out in "Basic Identifying Information" above.

## **\*\*REGION SPECIFIC PRIVACY TERMS\*\***

We do our best to implement the best privacy practices from each region for all of our customers, but if you are in a certain region, here are some specific requirements that may apply to you.

**If you are a California, Tennessee, Minnesota, Maryland, Indiana, Kentucky or Rhode Island resident,** you may take advantage of the following privacy rights:

- **Right to Know:** You have the right to know what personal information we have collected about you, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about you.

- **Right to Delete:** You have the right to delete personal information that we have collected from you. Note that there are some reasons we will not be able to fully address your request, such as if we need to complete a transaction for you, to detect and protect against fraudulent and illegal activity, to exercise our rights, for our internal purposes, or to comply with a legal obligation.

- **Right to Correct:** You have the right to correct inaccurate personal information that we may maintain about you, subject to appropriate verification.

- **Right to Limit Use of Sensitive Personal Information:** You have the right to limit the use of your sensitive personal information to only that which is necessary for providing products or services.

- **Right to Opt-Out of the Sale or Sharing of Personal Information:** You have the right to opt-out of the "sale" or "sharing" of your personal information, as such terms are defined in California, Tennessee, Minnesota, Maryland, Indiana, Kentucky and Rhode Island privacy laws. Please review the steps to 'unsubscribe from emails' or 'manage my privacy choices' provided on [this](<https://www.remitly.com/jp/en/help/article/update-profile>) help page.

***For California, Tennessee, Minnesota, Maryland, Indiana, Kentucky and, Rhode Island residents:*** If your Remitly account has a California, Tennessee, Minnesota, Maryland,

Indiana, Kentucky or Rhode Island mailing address, we will not share information we collect about you with nonaffiliated third parties, except as permitted by law, including, for example, with your consent or to service your account. We will limit sharing with our affiliates to the extent required by California, Tennessee, Minnesota, Maryland, Indiana, Kentucky and, Rhode Island laws.

**For Vermont residents:** If your Remitly account has a Vermont mailing address, we will not disclose information about your creditworthiness to our affiliates and will not disclose your personal information, financial information, credit report, or health information to nonaffiliated third parties to market to you, other than as permitted by Vermont law, unless you authorize us to make those disclosures.

**If you are a resident of Virginia,** you may take advantage of certain privacy rights, such as to request access, correction, deletion, or a copy of your personal information. We do not "sell" personal information but may engage in "targeted advertising" as these terms are defined under Virginia law, you may also exercise your right to opt-out of such sales or targeted advertising. You have the right to appeal a denial of your privacy rights.

How to Submit a Request To take advantage of your right to know, delete, correct, or portability under California, Tennessee, Minnesota, Maryland, Virginia, Indiana, Kentucky or Rhode Island law, or to submit an appeal of a denial of your privacy rights, please follow the process outlined in the "[Exercising Your Privacy Rights](#exercising-your-privacy-rights)" section above. We may request certain information to verify your identity before we can respond to your access, deletion, correction, or portability requests. We value your privacy and will not discriminate against you in response to your exercise of your privacy rights.

**DATA PROTECTION DISCLOSURES** What categories of Personal Information do we collect and what is the purpose? You can find a list of the categories of personal information that we collect in the "What Personal Data Do We Collect?" section above. For details regarding the sources from which we obtain personal information, please see the "How Do We Collect Your Personal Data" section above. We collect and use personal information for the business or commercial purposes described in the "How Do We Use Or Process Your Personal Data?" section above.

**Categories of Personal Information Disclosed and Categories of Recipients** We disclose the following categories of personal information for business or commercial purposes to the categories of recipients listed below:

- We share Basic Identifying Information with: Service Providers, Corporate Affiliates, Third Party Partners, advertising networks, and social media networks.

- We share Customer Support Information with: Service Providers, Corporate Affiliates, and Third Party Partners.
- We share Government Issued Identification or Records with: Service Providers, Corporate Affiliates, and Third Party Partners.
- We share Marketing & Communications Information with: Service Providers, Corporate Affiliates, and Third Party Partners.
- We share Payment Information with: Corporate Affiliates and applicable Service Providers that we engage from time to time to help us comply with our legal obligations in relation to risk scoring, fraud, counter-terrorist financing and anti-money laundering.
- We share Promotions and Competitions Information with: Service Providers, Corporate Affiliates, Third Party Partners, advertising networks, and social media networks.
- We share Recipient or Authorized User Information with: Service Providers, Corporate Affiliates, Third Party Partners, advertising networks, and social media networks.
- We share Remitly Flex Information with: Service Providers, Corporate Affiliates, and Third Party Partners.
- We share Sensitive Personal Data with: Service Providers, Corporate Affiliates, and Third Party Partners.
- We share Survey & Feedback Information with: Corporate Affiliates, Service Providers who help administer our programs, such as Community or product reviews, and Third Party Partners.
- We share Technical Information with: Service Providers, Corporate Affiliates, Third Party Partners, advertising networks, and social media networks.
- We share Transaction Information with: Service Providers, Corporate Affiliates, Third Party Partners.
- We share Usage Information with: Service Providers, Corporate Affiliates, Third Party Partners, advertising networks, and social media networks.
- For more information on how your information is shared, please see the "Who Do We Share Your Personal Data With?" section. We may also need to share any of the above categories of information pursuant to Legal Process.

Our use of cookies or other tracking technologies may be considered a "sale"/ "sharing" under applicable law. You may have the right to opt-out of having your personal data shared for purposes of targeted advertising. We do not knowingly sell the personal data of consumers under 16 years of age.

Categories of Personal Information that may be considered a "sale" or "sharing" under California, Tennessee, Minnesota, Maryland, Indiana, Kentucky or Rhode Island law:

Basic Identifying Information, Technical Information, and Usage Information.

Categories of third parties to whom the personal information was disclosed that may be considered a "sale" or "sharing" under California, Tennessee, Minnesota, Maryland, Indiana, Kentucky or Rhode Island law: certain Service Providers including advertisers and marketing partners, data analytics providers, and social media networks.

For more information on how your information is shared, please see the "Who Do We Share Your Personal Data With?" section, which provides more detail on our Service Providers and Third Party Partners. We may also need to share any of the above categories of information pursuant to Legal Process.

## **\*\*US CONSUMER PRIVACY NOTICE\*\***

The following Consumer Privacy Notice applies to you if you are an individual who resides in the United States and uses any of Remitly's Services for your own personal, family, or household purposes.

### WHAT DOES REMITLY DO WITH YOUR PERSONAL INFORMATION?

#### \*Why?\*

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

#### \*What?\*

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social security number and account information
- Transaction history and transaction information or instructions

#### \*How?\*

All financial companies need to share customers' personal information to run their

everyday business. In the table below, we list the reasons financial companies can share their customers' personal information; the reasons Remitly chooses to share; and whether you can limit this sharing.

**Reasons we can share your personal information:** For our everyday business purposes – such as to process your transactions, maintain your account(s), or respond to court orders and legal investigations

**Does Remitly share?:** Yes

**Can you limit sharing?:** No

**Reasons we can share your personal information:** For our marketing purposes— to offer our products and services to you and to deliver physical gifts as part of our loyalty program.

**Does Remitly share?:** Yes

**Can you limit sharing?:** No

**Reasons we can share your personal information:** For joint marketing with other financial companies

**Does Remitly share?:** Yes

**Can you limit sharing?:** No

**Reasons we can share your personal information:** For our affiliates' everyday business purposes—information about your transactions and experiences

**Does Remitly share?:** Yes

**Can you limit sharing?:** No

**Reasons we can share your personal information:** For nonaffiliates to market to you

**Does Remitly share?:** No

**Can you limit sharing?:** We do not share

WHO ARE WE?

Remitly, Inc. and for Remitly Flex customers, Remitly ADV, Inc.

WHAT DO WE DO?

\*How does Remitly protect my personal information?\*

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. We authorize our employees to access your personal information only when they need it to do their work, and we require companies that work for us to protect your information.

\*How does Remitly collect my personal information?\*

We collect your personal information, for example, when you:

- open an account or give us your contact information
- use Remitly to send or receive funds

We also collect your personal information from others, such as affiliates or other companies.

\*Why can't I limit all sharing?\*

Federal law gives you the right to limit only:

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using information to market to you
- sharing for nonaffiliates to market to you

## DEFINITIONS

**Affiliates:** Companies related by common ownership or control. They can be financial and nonfinancial companies. Our affiliates include companies with a Remitly name including but not limited to Remitly UK Ltd, Remitly Europe Ltd, or Remitly Canada, Inc.

**Nonaffiliates:** Companies not related by common ownership or control. They can be financial and nonfinancial companies.

Nonaffiliates with which we share personal information include service providers that perform services or functions on our behalf.

Joint Marketing: A formal agreement between nonaffiliated financial companies that together market financial products or services to you. Our joint marketing partners include financial companies and banks.