PRIVACY POLICY

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ABOUT THIS POLICY

This Privacy Policy (\"Policy\") applies to the websites located at remitly.com, the Remitly mobile applications and through any other programs (including Remitly Research programs), websites, or applications owned and operated by Remitly that direct you to this Policy.

This Policy, together with our [User Agreement](https://www.remitly.com/home/agreement) (and any additional terms of use mentioned in our User Agreement) applies to your use of our Services.

Where we use other capitalised words and phrases in this Policy (such as Agreement, Profile, Services and Transaction), these have the same meaning as given to them in our [User Agreement](https://www.remitly.com/home/agreement), unless we have defined them differently in this Policy.

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 Policy 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), 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), 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 Information: Including your recipient\'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, we may ask you for additional information so we can verify their identity with the financial institution.

Referral Information: Information you give us about your friend such as name and email address to tell them about our services.

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.

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 (this includes our #WhyISend survey).

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/logs (including a unique Transaction reference number), transaction receipts, purpose of transfers, relationship with the recipient, your average transaction amount, how often you intend to use our Services, if you intend to send to multiple recipients, and referral rewards.

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

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 a 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 (including WhyISend), 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/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 are in, we rely on the following legal bases to process your personal data:

COMPLY WITH LEGAL OBLIGATIONS

We use 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 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, anti-money laundering, 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 (including our referral program), 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 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 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 policy, 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, investigating fraudulent activity, conducting 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 policy, 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. For example, if you use our referral feature to refer persons via WhatsApp, Facebook, email, or SMS. Their use of your information is not governed by this privacy policy.

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 Policy.

WHY DO WE PROCESS SENSITIVE PERSONAL DATA?

We may ask you to specifically consent to the collection, use and storage of your biometric data during the verification process, where privacy regulations require it in your jurisdiction. If you do not consent, we offer alternate methods to verify your identity which may take longer. We will not disclose or share any biometric data to

anyone other than our identity verification providers, or when required by applicable laws and regulations, or pursuant to a valid order from a court.

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 login to your account, or to close your account. If you feel that an automated process may have impacted you, please contact our Privacy team at [DPO@Remitly.com] (mailto:DPO@Remitly.com).

WHAT ARE MY PRIVACY RIGHTS?

Our customers in certain regions of the world have specific data privacy rights based upon the applicable privacy legislation (including but not limited to the laws of Europe or UK). 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 held 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 to 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 as described below. 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 Policy.

Restrict Processing of Data Requests

You have the right to request to restrict or 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 simply 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 Profile. 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 the 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, save for the exceptions applicable 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.

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 [datasubjectrequest@remitly.com] (mailto:datasubjectrequest@remitly.com);

or

- [Contacting us](https://help.remitly.com/s/contact) via Chat or Phone.

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.

HOW DO WE PROTECT YOUR DATA?

We employ industry accepted standards in protecting the information you submit to us. We have put in place SSL (Secure Socket Layer) encryption technology to protect your sensitive information such as bank account number, credit card number, date of birth and government identification number, transmitted through our Site and/or our App. 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).

TRANSFERRING PERSONAL DATA OUTSIDE THE EEA OR UK

We share your personal data within the Remitly group and to external third parties (the categories of which are referred to in this Policy). This may involve transferring your personal data outside the UK or EU. Whenever we transfer your personal data outside the EU or UK, 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 [European Commission](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions*en). In other instances, we will ensure at least one of the lawful safeguards are implemented, which may include the use of specific contracts approved by (as applicable) the UK Government and/or [European Commission](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions*en), which give personal data the same protection it has in Europe.

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 (amongst 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 7 years following the end of your legal relationship with us.

CHANGES TO THIS POLICY

We may amend this Policy 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 Policy 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 of this Policy, or any change, you can end your Agreement with us and close your Profile by emailing us at datasubjectrequest@remitly.com or otherwise [contacting us](https://help.remitly.com/s/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-US*US/help/terms*maps.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 Remitly. 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 photo matches the photo on the documents. 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. A copy of Onfido\'s privacy policy can be found [here](https://onfido.com/privacy). We also create information based on our analysis of the information we have collected from you.

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

REFERRAL PROGRAM PRIVACY NOTICE

Using our referral service via e-mail to tell a friend about our Services, you will need to provide your friend\'s name and email address. Before providing us access to any other person\'s details, you must obtain their prior consent to you sharing their personal data with us and we will let them know that you have supplied their details to us.

Where you have:

- imported your contacts, at your instruction, we will send an emailinvite and at most one reminder email inviting him or her to visit our Site. We store this information for the sole purpose of sending this email; and/or
- referred a friend to us, we will automatically send your friend an email and at most one reminder email inviting him or her to visit our Site. We store this information for the sole purpose of sending this email and tracking the success of your referral.

In both cases, your contact/friend may at any time [REQUEST TO REMOVE](https://www.remitly.com/unsubscribe/stop*invites) this information from our database and we will honour such request. We will retain a copy of that email address on a \"suppression list\" in order to comply with their no-contact request. They are free to change their marketing choices at any time.*

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 a Profile with us, we will close it.

PRIVACY POLICY TRANSLATION

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

CONTACT AND COMPLAINTS

If you have any questions, comments, or requests regarding our privacy policy, you may reach out to privacy@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

: For EEA residents

Remitly Entity**:** Remitly Europe Ltd

Registered Address**:** 7TH FLOOR PENROSE TWO, PENROSE DOCK, CORK, IRELAND, T23 YY09

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

Data Protection Officer (DPO)**:** DPO@remitly.com

: For UK residents

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

Registered Address**:** 90 WHITFIELD STREET, LONDON W1T 4EZ, UNITED KINGDOM

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

Data Protection Officer (DPO)**:** DPO@remitly.com

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 parties 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 Profile 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 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: Referral Information

Our Lawful Basis for Processing: Necessary for one or more of the legitimate interests (namely to market our services to them).

Types of Personal Data: Sensitive Personal Data

Our Lawful Basis for Processing: To comply with our legal obligations. It is also necessary for reasons of substantial public interest (namely preventing or detecting unlawful acts, regulatory requirements relating to unlawful acts and dishonesty and suspicion of terrorist financing or money laundering). Where data protection laws only permit us to process biometric data with your consent, we will seek your consent prior to 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. WhyISend Campaign: Consent.

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.