

# Remitly's Privacy Notification and Consents

**Please take the time to read the following information carefully. We also recommend that you store this document in a safe place.**

This Privacy Notification and Consents ("Document") was last updated on 15 November 2017. It applies to users of the Remitly services resident in Australia. To view the Privacy Policy applicable to users resident in the US, please click [here](<https://www.remitly.com/home/privacyusa>). *If you are resident in Canada, the applicable Privacy Policy can be found [here](<https://www.remitly.com/home/privacycan>).* If you are resident in the UK, the applicable Privacy Policy can be found [here](<https://www.remitly.com/home/privacygbr>).

Remitly Australia Pty Ltd (ACN 618 869 980) ("**Remitly**") is serious about respecting and protecting your privacy, consistent with its obligations under the Privacy Act 1988 (Cth) ("**Privacy Act**").

## Important Consents

**To provide our services we ask that you consent to the collection, use and disclosure of your personal information as set out in this Document. In particular, by agreeing to this Document you express consent to:**

- **the collection, use and disclosure of your sensitive information (this helps us comply with our legal obligations and may include us using facial recognition technology and scans of your identity documents) (see section 2.2 below);**
- **the disclosure of your information to a credit reporting body for verification of identity purposes (rest assured this does not give us access to a credit report, nor does it impact your credit score or your credit history) (see section 4.1 below);**
- **the disclosure of your personal information to trusted third party recipients overseas (see section 6 below); and**
- **the receipt of marketing materials (including by email and other methods) from Remitly (you have the ability to opt-out of receiving such messages) (see section 9 below).**

**If you do not wish to consent to these matters then please do not use our services.**

## 1. Purpose and Scope

### What does this document cover?

1.1 This Document is our Privacy Policy (for the purposes of Australian Privacy

Principal (“APP”) 1 in the Privacy Act) and our Privacy Notification (for the purposes of APP 5 in the Privacy Act) and sets out how Remitly collects, handles, uses and discloses your personal information. It describes:

1. with whom we share it (and how you can elect in certain situations to not share information with third parties );
2. how you can access and correct this information; and
3. how you may complain about a breach of the APPs and how we will deal with those complaints.

1.2 This Document, 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 products and services (our “Services”), where such Services are made available or accessible via our:

1. websites (such as [www.remitly.com](http://www.remitly.com)) (our “Websites”); and
2. our mobile applications (our “App”), once you have downloaded or streamed a copy of our App on your mobile telephone or handheld device (“Device”).

### **What is the meaning of certain words and phrases used in this Document?**

1.3 The terms “you”, “your” and “yours” refer to the customer or other user accessing and/or using our Services. When we use the phrase “Personal Information” in this Document we are referring to information such as name and email that can be used to identify you individually.

1.4 We also use other capitalised words and phrases (such as “Profile”) which 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 Document.

### **When does this Document apply?**

1.5 You acknowledge that by clicking ‘Join’, ‘Send Money’, ‘Confirm Transfer’ and/or as our Services otherwise instruct you to actively agree to this Document you consent to our use and disclosure of your personal information in the manner described in this Document.

### **How may this Document change?**

1.6 Generally. We may amend this Document at any time, and whenever we do so we will post a revised version on our Website.

## **A special note about children**

1.7 We ask that persons under the age of 18 (which we treat as children and minors) refrain from using our Service or submitting any personal information to us. Persons under the age of 18 years are not eligible to use our Service and if we discover that someone under the age of 18 has registered a Profile with us, we will close it. If you have questions or concerns regarding this Document, you should [contact us](<https://www.remitly.com/home/contact>).

## **2. Information We Collect and How We Collect and Hold It**

2.1 We may collect, use, disclose and hold the following information about you, which may include non-public personal information:

**1. Information you give us about yourself.** You may give us personal information about yourself as a result of using our Services. This includes information you provide when you download, or register to, our App, register to any of our Services (whether via our Websites or our App), carry out money transfer and messages via our Services, share data via our Website and/or App social media functions, enter a competition, promotion or survey and also when you report a problem or query related to our Services, Websites and/or App. The information you may give us includes: your name, address, e-mail address, date of birth, telephone number (including your Device's telephone number), username, password, other security and registration details, all or part of your government identification details, bank account number, credit/debit card number, personal description, photograph and/or your picture, video/audio recording, or other evidence of yourself with your identification documentation. Under certain circumstances we will also collect and save information obtained from scanned copies of official identification documents, including your passport or drivers' licence. If you contact us, we may keep a record of that correspondence.

**2. Information you give us about third parties.** We also collect third party personal information you provide in order for us to facilitate funds transfers, such as your recipient's full name, physical address, email address, and phone number. However, we will not contact your recipients except as instructed by you or as required to complete a transaction. This information is only used for the sole purpose of completing your request or for whatever reason it may have been provided and will be stored for a certain period of time to comply with legal requirements. Please note that these recipients have the same rights to access and correct information about themselves as anyone else that uses our Services.

**3. Information we collect about you, your use of our Services and your Device.** Each time you visit one of our Websites or use our App we may automatically collect the following information:

**4. Information about your usage of the Service, including your transaction history, and how and to whom you use the Service to send or receive money;**

**5. Information that we indirectly obtain from you,** such as information about the hardware and software you use when accessing the Service (which may include 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 number used by the Device), your IP address, mobile network information, your mobile operating system, the type of mobile browser you use, its time zone setting, the pages you access on our Websites, and other websites that you visit prior to accessing our Service.

**6. Information we receive from other sources.** We work closely with third parties (including, for example, identity verification services, electronic database services, business partners, sub-contractors in technical, payment and delivery services, advertising networks, market research service providers, analytics providers, and search information providers) and may lawfully obtain information about you from them.

**7. Location information.** We may also use GPS technology to determine your current location. Some of our location enabled Services require your personal data for this to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose.

**8. Unique Application Numbers.** When you install or uninstall a Service containing a unique application number or when such a Service searches for automatic updates, that number and information about your installation, for example, the type of operating system, may be sent to us.

**9. Information from 'sign-in' services and social media platforms.** You can log in to our Website using sign-in services such as Facebook Connect or an Open ID provider. These services will seek to authenticate your identity and provide you the option to share certain personal information with us such as your name and email address to pre-populate our sign up form.

Services like Facebook Connect give you the option to post information about your activities using our Services to your profile page to share with others publicly or within your network. If you are unsure about what information these service providers / social media platforms are sharing with us, please review your privacy settings with those services as well as their privacy notices.

2.2 As part of verifying your identity we may collect sensitive information (being information related to your race, political or religious beliefs, sexual preferences, criminal convictions, membership of professional or trade associations or unions and biometric and health data). For example, through facial recognition technology or scans of your identity documents. You acknowledge that by clicking 'Join', 'Send Money', 'Confirm Transfer' and/or as our Services otherwise instruct you to actively agree to this Document, you are consenting to us collecting your sensitive information as set out here.

2.3 Without your personal information we may be unable to provide you with our Services.

### **3. How we use cookies, web beacons and similar technology**

We and our marketing, analytics and risk partners or affiliates use cookies, web beacons and similar technology. These technologies are used in analysing trends, administering the site, tracking users' movements around the site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis. You may switch your browser settings to block cookies, but if you do so then you may not be able to access all or parts of our Services.

As is true of most web sites, we also gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data.

We may combine this automatically collected log information with other information we collect about you. We do this to improve Services we offer you.

### **4. How we use the personal information we collect and hold**

4.1 Specified purposes. We collect and hold Personal and Non-Personal information for the following purposes:

1. To process an application to register and use our Services, including to verify your identity. This may include the disclosure of your name, residential address and date of birth to an identity verification service provider and credit reporting bodies so that they can provide us or our service providers with an assessment of whether the personal information we have collected about you can be verified against personal information they hold about you. To enable us to do this you expressly authorize our identity verification service provider and their data provider service providers to be your agent in accessing databases to verify your identity.

The credit reporting body may use the personal information about you and personal information it holds (the names, residential addresses and dates of birth) of other individuals, for the purpose of preparing such an assessment.

2. To process your transactions, provide our other Services and related

customer support.

3. To maintain a transaction and messaging history for customer reference.
4. To track, improve and personalise our Services, content and advertising.
5. To collect payment for your use of the Service.
6. To troubleshoot problems with the Service.
7. To comply with applicable laws and regulations, relevant industry standards and our policies, including the Anti-Money Laundering and Counter-Terrorism Financing Act, the Corporations Act and the Taxation Administration Act, the Income Tax Assessment Act and other taxation laws.
8. To detect and prevent fraud and other unlawful and/or illegitimate uses of the Service.
9. To give effect to your legal rights.
10. To exercise legal rights and/or defend claims.
11. To send you marketing notices, service updates, and promotional offers.
12. To collect survey information that will be used to monitor or improve the use of our Service and overall customer satisfaction.
13. To create anonymous statistical and other information to help us understand and improve our Service and our business.
14. To perform trend and financial data analysis.

4.2 Other purposes. We also collect your information for any other purposes directly related to the purpose for which the information was originally obtained.

## **5. How We Disclose Information To Others**

5.1 We will share your personal information with third parties only in the ways that are described in this Document.

5.2 We do not sell or rent the information we collect about identifiable individuals to third parties (such as advertisers) for their promotional purposes but we may provide them with anonymous aggregated information about our users (for example, we may inform them that 300 women aged under 40 have clicked on their advertisement on any one day). We may also use such aggregated information to help such advertisers reach the kind of audience they want to target (for example, men in Sydney). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience. These companies may use your personal information only as necessary to provide these services to us.

5.3 Nevertheless, we may disclose information about you (including non-public, personal information) with:

1. Other users of our Service for the purposes of carrying out our Services and/or managing any issues which may result.

2. Third-party service providers under contract with us that help us with our business operations, such as payment transaction and messaging processing, third party identity verification service providers, fraud prevention, and marketing. These third parties are prohibited from using your information for their own separate business purposes, with the exception of our third party service providers that assist us with third party identity verification and fraud prevention that may keep a record of the information we supply and who may also disclose the fact that a search of its records was made to its other customers for the purposes of assessing the risk of giving credit, to prevent fraud and to trace debtors.

3. Your bank or credit or debit card issuer and your recipient's disbursement provider (such as their bank) for the purpose of carrying out our Services and in particular to assist in our fraud and risk prevention activities.

4. Other group companies, agents, contractors and other service providers that are under a duty of confidentiality to us and have undertaken to keep your personal information confidential.

5. In the event of the sale, acquisition or merger of some or all of our assets, your personal information might be a part of the transferred assets. We shall notify you in the event of such an occurrence, as well as any choices you may have regarding your personal information, by placing a notice on our website.

6. The police, security forces, any law enforcement agencies, competent governmental, intergovernmental or supranational officials and bodies, competent agencies, regulatory bodies (including self-regulatory bodies or schemes) or other third parties, but only

1. in connection with a formal request, subpoena court order, or similar legal procedure; and

2. when we are co-operating with an investigation by any of the persons referred to above; and,

3. when we believe in good faith that disclosure is necessary to comply with the law, prevent physical harm or financial loss, report suspected illegal activity, or to enforce, act in compliance of, and/or investigate violations of our User Agreement.

7. Persons you have referred to us via our referral programmes.

8. Other third parties with your consent and direction to do so.

## **6. Disclosure of your personal information to overseas recipients**

Personal information that we collect from you will be disclosed to overseas recipients. The countries in which overseas recipients are likely to be located include the country or region of your recipient, together with the United States, the Philippines, Nicaragua, Canada and/or the U.K. as well as the countries and regions which make up the European Economic Area.

You acknowledge that by clicking 'Join', 'Send Money', 'Confirm Transfer' and/or as our Services otherwise instruct you to actively agree to this Document, you are consenting to us disclosing your personal information to overseas recipients and APP 8.1 will not apply to the disclosure. This means that we will not be obliged under the Privacy Act to take reasonable steps to ensure that an overseas recipient does not breach the APPs and we may not be liable under the Privacy Act if the recipient does not act consistently with the APPs.

## **7. Access To and Correction Of Your Information**

7.1 The Privacy Act gives you the right to request access to the personal information we hold about you. We will generally be able to meet your request, subject to certain exceptions under the Privacy Act.

7.2 If we provide you with access to your personal information we may charge you an amount that reflects our costs of providing you access. We will inform you in advance of any likely charge.

7.3 Remitly takes all reasonable steps to ensure that the personal information it collects, uses or discloses is accurate, complete, up-to-date and relevant to the Services provided to you or the nature of the relationship with you. If you believe that this is not the case in relation to any personal information Remitly holds about you, you have the right to request that Remitly correct your personal information. If you would like to request correction of your personal information please contact us by emailing our Customer Support at [service@remitly.com](mailto:service@remitly.com), or by contacting us by telephone at [+61 2 8311 6331](tel:+61283116331)

7.4 Please make sure that the information you provide us is always current, complete and accurate. You can access, modify, delete or update your personal information submitted on our Website by logging into your Profile and changing your preferences.

## **8. Security and data retention**

8.1 We employ industry accepted standards in protecting the information you submit to us via our Services. We have put in place SSL (Secure Socket Layer) encryption technology to protect your sensitive information such as bank account number, credit



card number and date of birth, transmitted through our Website 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 Website 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. If you have any questions about security on our Web site, you can contact us at [service@remitly.com](mailto:service@remitly.com).

8.2 We will not keep personal information any longer than is necessary for the fulfilment of the purposes set out in this Document (including any directly related purpose). However, please note that we will retain your information for as long as your Profile is active or as needed to provide the Services to you.

We will also retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **9. Choices You Can Make About Our Use Of Your Information**

9.1 We may use your personal information to identify and send you information about Services and third party products and services that we think may be of interest to you. You acknowledge that by clicking 'Join', 'Send Money', 'Confirm Transfer' and/or as our Services otherwise instruct you to actively agree to this Document, you consent to us sending you marketing communications (including by phone, electronic message or any other delivery method) for this purpose. You have the right to ask us not to process your personal data 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 we will comply with your request within a reasonable period.

9.2 You may also control how we use some of your personal information 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.

## **10. Links to 3rd Party Sites & Third Party Services**

10.1 Our Website and App includes links to other Websites whose privacy practices may differ from those of Remitly. If you submit personal information to any of those sites, 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.

10.2 This Document 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.

## **11. Google Maps**

Parts of the Remitly 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 and the Google Privacy Policy. By using the Services and agreeing to this Document you also agree to the Google Terms (as amended from time to time).

## **12. Chat**

We use a chat feature to answer questions about our Services and assist you with our website's functionality. If our chat feature is offline we will collect your name and email address so that we may reply to your request.

## **13. Social Media Widgets**

Our Web site includes Social Media Features, such as the Facebook Like button and Widgets, such as the Share this button or interactive mini-programs that run on our site. These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the privacy policy of the company providing it.

## **14. Import Contacts**

We may give you the ability to import contacts from your Gmail, Yahoo Mail or other email providers as well as allowing you to manually enter them to invite them to become members of our Services. Before providing us access to any other person's details, you must obtain their prior permission to share their information with us and we may let them know that you have supplied their details to us. We do not collect the

username and password for the email account you wish to import your contacts from as you provide it directly to that email service provider and after your approval they send us your email contacts. At your instruction we will send an email invite and at most one reminder email in addition to the original invite.

## **15. Complaints**

15.1 If you have a complaint regarding our handling of your personal information including if you believe we have breached the Privacy Act, contact Remitly Customer Service, online; by phone [(02) 8311 6331](tel:(02) 8311 6331); or by email at [au-complaints@remitly.com](mailto:au-complaints@remitly.com).

15.2 We will respond to your complaint within 30 days of receipt of the initial complaint. We will provide you with a written notice setting out our decision.

15.3 If we are unable to resolve the complaint within 30 days we will:

1. inform you of the delay and the reasons for the delay; and
2. specify a date when a decision can reasonably be expected.

15.4 All complaints will be processed at no charge to you.

15.5 If you are not satisfied with the handling of your complaint you may wish to contact the OAIC at:

phone: 1300 363 992

Email: [enquires@oaic.gov.au](mailto:enquires@oaic.gov.au).

Website: [www.oaic.gov.au](https://www.oaic.gov.au)

mail: GPO Box 5218, Sydney NSW 2001, Australia

## **17. Contact**

You can contact us with any questions or concerns at:

Email: [Customer Service](mailto:service@remitly.com).

Phone: [(02) 8311 6331](tel:(02) 8311 6331)