



Rev.: May 2022

## **Our Privacy Pledge - USA**

RevoluGROUP USA Inc trading as RevoluPAY and its affiliates (collectively, “RevoluPAY”) are committed to respecting and protecting your privacy. We value your trust and want you to understand how we collect, use, protect, disclose and otherwise process information about you.

This privacy statement applies to personal information we collect about you, for example when you visit our websites or mobile applications or contact RevoluPAY call centers, or when you or the party on the other side of a transaction complete transaction forms or otherwise provide personal information at agent locations or online. We want to ensure you are aware of our practices for collecting, using, protecting disclosing, and otherwise processing personal information, which is information about a person that can be used to identify that person.

## **What We Collect**

The types of personal information we collect depends on the products or services you have requested from us. Personal information we collect can include: (i) government identifiers (such as ID, passport number, or driver’s license number); (ii) transaction information (such as name and other information about you and the party on the other side of your transaction, transaction number, amount, date sent, and receive data), purchase history, and RevoluPAY account information (such as account number, user name, and password); (iii) financial information such as bank account or credit card account information; (iv) contact information such as name, address, telephone number, or email address; and (v) such other personal information as we may collect with your consent or as permitted or required by law.

We collect your personal information directly from you and/or from the party on the other side of your transaction, for example, when you tell us where to send money or who should receive the money; give us your contact information; or show your government issued ID. Generally, personal information is collected from you on transaction forms, by telephone, or at our websites or mobile applications when you request our products or services, manage your online account(s), or enroll in the RevoluPAY or manage your account(s) and preferences. We may also collect information about you from third-party reference sources, vendors, and clearinghouse services as part of our verification processes or otherwise in connection with your use of our products or services.

## **How We Use It**

We use personal information in a number of ways, including (i) for our everyday business purposes such as to process your transactions, maintain your account(s), and manage and administer our business and records, to undertake market research, to prevent fraud, abuse, and other actual and potential prohibited or illegal activities, to meet legal, regulatory, insurance, security and



processing requirements, and to respond to court orders and legal investigations, or report to credit bureaus; (ii) for our marketing purposes such as to offer our or our agents' products and services to you, and to tailor offers, coupons, and incentives we believe may be of interest to you; (iii) for joint marketing with other financial companies; (iv) for our affiliates' everyday business purposes; (v) for our affiliates to market to you; (vi) for non-affiliates such as our agents to market to you; and (vii) otherwise with consent or as permitted or required by applicable law.

RevoluPAY may store personal information on databases in the United States or other countries for these purposes. As permitted by applicable law, we may merge personal information with public information or other information received from third-party sources to update contact information or to enhance demographic profiles. Personal information will be subject to the laws of the country in which it is located including lawful access requests by government authorities. The laws of these countries (which may include countries outside the European Economic Area) may not have similar data protection laws to the European Economic Area.

## **How We Disclose It**

We may disclose personal information, as described above, to our affiliates and/or our agents to assist us in our business activities for the uses described in “How We Use It”, and for other purposes as permitted or required by applicable law and international conventions and treaties. Disclosures permitted or required by law and international conventions and treaties may include cooperation with criminal or government investigations, fraud prevention and detection, and responses to a court order or subpoena. RevoluPAY may be required to disclose your personal information to relevant national, state and local law enforcement authorities in the US and other countries, which law enforcement authorities may further disclose the information. If you are a receiver of a transaction, RevoluPAY may also disclose your personal information to the sender.

RevoluPAY may disclose some or all of the personal information to service providers for the purposes of processing requested transactions or to perform business support functions on our behalf, including marketing and similar services. Our agreements with these service providers, who may be located across the globe, contain confidentiality provisions and restrictions on using this information for any other purposes.

If RevoluPAY becomes involved in a proposed or actual merger, acquisition or any form of sale of some or all its assets, we may disclose personal information to third parties in connection with the evaluation of the transaction. The surviving company, or the acquiring company in the case of a sale of assets, would have access to personal information which would continue to be subject to this privacy statement.



## Choice and Consent

RevoluPAY will not use, disclose or otherwise process personal information about you in ways incompatible with the ones described above without informing you and offering you a choice as provided for by applicable law. You may choose whether to receive direct marketing offers from RevoluPAY. To the extent that applicable law requires express consent or “opt-in” for the collection and use of certain types of personal information, RevoluPAY will maintain processes and procedures to ensure such information is collected with express consent. In any event, each promotional email message we send you will also contain instructions on how to unsubscribe.

When you provide us with personal information about a third party, you warrant that you have the consent of that individual to provide us that personal information.

You may withdraw your consent to our use and disclosure of personal information at any time, subject to contractual and legal restrictions. You may send an e-mail to [RevoluPAY Help Center](#), logon to our websites and update your account(s), or use one of the methods listed under “Contacting RevoluPAY”. Note that if you withdraw your consent to certain uses of your personal information, we may no longer be able to provide certain of our products or services, including RevoluPAY membership and account usage. Note also that where we have provided or are providing services to you, your consent will be valid for so long as necessary to fulfill the purposes described in this privacy statement or otherwise at the time of collection, and you may not be permitted to withdraw consent to certain necessary uses and disclosures (for example, maintaining reasonable business and transaction records).

## Correctness and Access

RevoluPAY wants to ensure that the information we collect and use about you is exact for its intended purpose and therefore we have processes to help maintain the accuracy of the personal information we collect. You can request access to your personal information or help us maintain accurate records by informing us of changes or modifications to your personal information by using one of the methods listed under “Contacting RevoluPAY”. In addition, RevoluPAY users with an online account may logon to our websites and/or Apple and Android apps to review and correct information about them.

We will take reasonable steps to verify your identity before granting you access or enabling you to make corrections. RevoluPAY will retain personal information only for the time period needed for business purposes or as required by law and will securely destroy such information thereafter.



## Data Security

RevoluPAY uses physical, technical, and administrative security measures to protect against loss, misuse, and alteration of personal information under our control. RevoluPAY uses industry-standard practices and security measures to safeguard such personal information we collect.

Access to personal information is restricted to employees and service providers who need to have access to that information as described in this privacy statement, in accordance with applicable laws. Our service providers are required to observe standards for the security, collection, use, and sharing of personal information, and to comply with applicable law.

## Preventing Identity Theft

Please do not send confidential personal information such as passport numbers, government identification numbers, or account numbers to RevoluPAY via an unsecured email message. You may send personal confidential information to RevoluPAY via posted mail, phone, or using the “[RevoluPAY Help Center](#)” link available on our website. Do not be misled by emails that appear to be from us and ask for personal information. If you receive a suspicious email requesting your personal information, please forward the message immediately to [RevoluPAY Help Center](#). To learn more about preventing fraud, visit the [RevoluPAY Help Center](#).

## Browsing

When you use our websites, we automatically collect certain standard technical information. Examples of this standard type of information include the type of Internet browser you use, the files you requested, the domain name and country from which you request information. We use this type of technical information to improve our website, to make our website function correctly, and to better understand how visitors use our website. As part of our efforts to protect consumers from fraud, this information is also used to authenticate users to the website, if necessary.

## Cookies

Please see [Cookie Policy](#)

## External Websites

Our websites may be linked to or from third-party websites. RevoluPAY is not responsible for the content or privacy practices of websites that are linked to or from our websites.



## **Use by Children**

RevoluPAY websites are not intended for use by minors. RevoluPAY will not knowingly collect personal information from or market to children without the consent of a parent or legal guardian.

## **Change in Privacy Statement**

At RevoluPAY, your trust is one of our most important assets. To improve your overall RevoluPAY experience, the services provided on our websites may change at any time without prior notice. We will continually work to protect the privacy of our consumers and regularly review our privacy policies. As a result, this Privacy Statement may change from time to time in the future. This website will always contain the most current privacy statement. You agree to revisit this page regularly and your continued use of the RevoluPAY websites and services indicate your acceptance of the changes.

## **Contacting RevoluPAY**

Should you have further questions regarding our privacy statement, about how your personal information is used, or about how to exercise your right of access, rectification, or objection as per applicable law, you can contact us directly at the address below, and we will handle your request on behalf of all RevoluPAY companies:

RevoluPAY  
Attn: Privacy Officer  
444 Brickell Avenue, STE 416  
Miami, 33131  
U.S.A.

Alternatively you may call us at: +34 93 893 05 86 or message us at: [RevoluPAY Help Center](#).