

## EASYREMIT 'IZZYREMIT' PRIVACY POLICY (EFFECTIVE 24<sup>TH</sup> OF MAY 2018)

This website is operated and provided by Easyremit Ltd ("Izzyremit", "we", "us", "our") with its registered office at 48 Downsview Road, London, SE19 3XB and, if you reside in United Kingdom where we provide our services to You and are a user of our website <https://www.izzyremit.com/> ("our site") and/or of our mobile application (the "Mobile App"), we are a data controller for the purpose of Data Protection Legislation (as defined below). In this Privacy Policy, references to "You" and "Your" are references to a user of our website and/or of our Mobile App

### Introduction

We are committed to protecting and respecting Your privacy and handling Your information in an open and transparent manner.

This policy ("Privacy Policy") explains what information we collect from You, or You provide to us, what we will use it for and with whom we share that information. The Privacy Policy also sets out Your rights and who You can contact for more information. Please read the following carefully to understand our views and practices regarding Your personal data and how we will treat it.

In this Privacy Policy, Your information is sometimes called "personal data". We may also sometimes collectively refer to handling, collecting, protecting and storing Your personal data as "processing" such personal data.

In this Privacy Policy the term "Data Protection Legislation" means the EU General Data Protection Regulation 2016/679; together with all other applicable legislation relating to privacy or data protection.

Should we ask you to provide certain information by which you can be identified when using this website you can be assured that it will only be used in accordance with this privacy statement.

This policy (together with our Terms and Conditions and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand the types of information we collect from you, how we use that information and the circumstances under which we will share it with third parties

## INFORMATION WE MAY COLLECT ABOUT YOU

We may collect, record and use information about You in physical and electronic form and will hold, use and otherwise process the data in accordance with the Data Protection Legislation and as set out in this Privacy Policy.

The personal data we collect and process may include, among others:

- Your name;
- Your contact information such as Your email address and telephone number (or any telephone number used to call our customer services);
- Your demographic information such as age, education, gender, and interests;
- Evidence of Your identity (for example passport information);
- unique identifiers such as username, account number and password;
- Your profiles and postings on any other social media applications and services that we provide or that You make available to us;
- Your payment details or other financial data, e.g.: Your bank or payment method provider's name, or your account number, sort code and billing address; and
- information about Your visit to our website, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.

We also collect from You information in relation to other people (e.g.: details of the recipients of Your money transfers), where You provide us with such information. By providing us with such information you confirm that you have obtained any

necessary permission from such persons to the reasonable use of their information for such purposes in accordance with this notice, or are otherwise permitted to give us this information on their behalf. Please also ensure that those other people are aware of this notice and that the provisions of this notice are clearly communicated to them.

## How we collect information about You

- **Information You give to us when You use our services.** If You use our services You will need to provide certain information including Your name, address and card number, as well as the name and other details the recipients of the money transfers that you instruct us to carry out.
- **Other information You give to us.** This is information about You that You give us by filling in forms on our site (e.g.: the 'contact us' section) or by corresponding with us by phone, e-mail or otherwise. It includes, for example, information You provide when You register on the site for us to contact You, and when You report a problem with our site. The information You give us may include, among other data, Your name and e-mail address.
- **Social Media.** Depending on Your settings or the privacy policies for social media and messaging services such as Facebook, LinkedIn and Instagram, You might give us permission to access information from those accounts or services.
- **Other Sources.** We may receive information about You from other sources, including publicly available databases and combine this data with information we already have about You. This helps us to update, expand and analyse our records and provide services that may be of interest to You.
- **Information we collect about You.**
  - Like most websites, we use "cookies" to help us make our site – and the way You use it – better. Cookies mean that a website will remember You. They're small text files that sites transfer to Your computer (or phone / tablet). They improve website use and speed – for example by automatically filling Your name and address in text fields. Please see our cookies policy for further information.

- **Log Files.** In addition, with regard to each of Your visits to our site, we will automatically collect certain information (e.g.: 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.
- **Social Media Widgets.** Our website includes Social Media Widgets or Features, such as the Facebook Like button and Twitter button which are interactive mini-programs that run on our site to provide specific services from another company (e.g.: displaying the news, opinions, music, etc.). Personal information, such as Your email address, may be collected through the Widget. Cookies may also be set by the Widget to enable it to function properly. Information collected by this Widget is governed by the privacy policy of the company that created it.
- **Mobile App:**When You download our Mobile App, in addition to the information mentioned above we:
  - automatically collect information on the type of device You use, operating system version, and system and performance information. We may send You push notifications from time-to-time in order to update You about any events or promotions that we may be running. If You no longer wish to receive these types of communications, You may turn them off at the device level. To ensure You receive proper notifications, we will need to collect certain information about Your device such as operating system and user identification information;
  - may collect Your location-based information for the purpose of locating a place that You may be searching for in Your area. We will only share this information with our mapping provider for the sole purpose of providing You with this service. Your geo-location data may be shared with third parties for the purpose of them serving You ads for places (such as restaurants) in Your area. You may opt-out of location-based services at any time by editing the setting at the device level or by emailing us at [Admin@izzyremit.com](mailto:Admin@izzyremit.com); and
  - may use mobile analytics software to allow us to better understand the functionality of our Mobile Software on Your phone. This software may record

information such as how often You use the Mobile App, the events that occur within it, aggregated usage, performance data, and where the Mobile App was downloaded from. We do not link the information we store within the analytics software to any personal data You submit within the Mobile App.

### How we use Your information

Our primary purpose in collecting user information is to provide You with a safe, smooth, efficient, and customised experience and to provide the services You have requested from us. We may also use the information that You have provided to ensure that the content on our site is presented in the most effective manner for You and Your computer or device.

### We use Your information for the following specific purposes:

- to carry out our obligations arising from any contracts entered into between You and us or from applicable law, and to provide You with the services in accordance with our terms and conditions and with this Privacy Policy;
- to register You with a Izzyremit Account;
- to fulfil Your Transaction Request;
- to send You confirmations;
- to notify You about changes to our services;
- to prevent fraud;
- to ensure that content from our site is presented in the most effective manner for You and for Your computer;
- to send You marketing communications, provided that You have given us Your contact details in the course of a sale (or of negotiations for a sale) of our products or services and that you do not decide to opt out from this type of communications, in accordance with Data Protection Legislation (including the European Directive 2002/58/EC and The Privacy and Electronic Communications (EC Directive) Regulations 2003).
- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- as part of our efforts to keep our site and our services safe and secure;

- to measure or understand the effectiveness of advertising we serve to You and others, and to deliver relevant advertising to You;
- to make suggestions and recommendations to You and other users of our site about services that may interest You or them; and
- to display personal testimonials of satisfied customers on our website in addition to other endorsements, where You have agreed with a third-party review site that we may do so. If You wish to update or delete Your testimonial, You can contact us by writing to or emailing us at [Admin@izzyremit.com](mailto:Admin@izzyremit.com).

### Legal grounds for using Your personal information

The law permits us to process Your personal data in the way we do because the processing is:

- necessary for the purposes of the legitimate interests that we pursue, which are:
  - to run and administer our business;
  - to prevent fraud;
  - to provide you with our services;
  - to evaluate, develop or improve our services;
  - to keep you informed about relevant products and services you are using;
  - to discharge our legal obligations to store and disclose information where necessary; and/or
  - to provide You with an efficient and smooth customer experience;
- necessary for the performance of our contract with You to provide You with our services;
- necessary in order to comply with a legal obligation to which we are subject; or
- permitted by You, because You have given us consent.

## Sharing Your information

The following categories of recipients may receive Your personal information and process it for the purposes outlined in this Privacy Policy:

- We may disclose data to provide our services, to respond to legal requirements, enforce our policies, liaise with judicial or regulatory authorities where required under applicable law, and protect our rights and property.
- The personal information You provide to us may also be shared with third party companies, agents, contractors, service providers or related companies, including without limitation:
  - with credit reference agencies to verify Your identity or recipients of the money transferred through the Service, if this is necessary to provide You with our services, respond to Your enquiries or for any other related purposes, and
  - with fraud prevention agencies who may use it to prevent fraud and money-laundering and to verify Your identity (please note that those who commit fraud can be refused services, finance or employment. Further details of how Your information will be used by us and these fraud prevention agencies can be found by contacting us at [Admin@izzyremit.com](mailto:Admin@izzyremit.com)
- We may also share Your personal information with:
  - other companies we have instructed to provide services to or for us;
  - other third parties for those purposes that may be reasonably ascertained from the circumstances in which the information was submitted;
  - other business entities, should we plan to merge with, or be acquired by, or be invested in by that business entity, or if we undergo a corporate re-organisation;
  - any successor in interest, in the event of a liquidation or administration of Izzyremit; and
  - to any other third party, but only subject to Your prior consent.

## Links to Other Sites

Our website may contain links to other sites, including via our social media buttons. While we try to link only to websites that share our high standards and respect for

privacy, we are not responsible for the content, security, or privacy practices employed by other websites and a link does not constitute an endorsement of that website. Once You link to another website from our website You are subject to the terms and conditions of that website, including, but not limited to, its internet privacy policy and practices. Please check these policies before You submit any data to these websites.

### Behavioural Targeting / Re-Targeting

We partner with third parties to either display advertising on our website or to manage our advertising on other sites. Our third-party partners may use technologies such as cookies to gather information about Your activities on this site and other sites in order to provide You advertising based upon Your browsing activities and interests. If You do not wish to have this information used for the purpose of serving You interest-based ads, You may opt-out by writing to or emailing us at [Admin@izzyremit.com](mailto:Admin@izzyremit.com)

### How we protect Your information

We ensure that there are appropriate technical, physical, electronic, and administrative safeguards in place to protect Your personal details from unauthorised access. When You enter certain information such as a credit card number on our order forms, we encrypt the transmission of that information using reasonable security measures. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it.

Unfortunately, the transmission of information via the internet (including by email) is not completely secure. Although we will do our best to protect Your personal data, we cannot guarantee the security of Your data transmitted to our site; any transmission is at Your own risk. Once we have received Your information, we will use strict procedures and security features to try to prevent unauthorised access.



## How long we keep Your information

We will only keep the information we collect about You for as long as required for the purposes set out above, or as required to comply with any legal obligations to which we are subject. This will involve us regularly reviewing our files to check that information is accurate, up-to-date and still required.

The period for which we will retain information about You will vary depending on the type of information and the purposes that we use it for. In general, we will keep our records for up to 7 years after you have terminated your relationship with us, in order to comply with our legal obligations.

We may retain Your contact information collected for the purposes of sending You marketing communications in accordance with this policy for as long as You do not unsubscribe from receiving the same from us.

## Transferring data outside of the EEA

Data that You submit via our site or Mobile App is sent to and stored on secure servers owned by, or operated for, us in the EEA. Data may be transferred to, or stored at, a destination outside the European Economic Area ("**EEA**") and may also be processed by staff operating outside the EEA who work for us, or for one of our service providers, related companies, agents or contractors. Such transfers may be made in order to operate the service, improve our site, Mobile App or services, or to assist in our security or fraud protection activities.

Where recipients are outside the EEA, we ensure that they provide an adequate level of protection for Your personal data or that the transfer is otherwise permitted under applicable Data Protection Legislation, by methods including using standard contractual clauses, binding corporate rules, registration for the Privacy Shield program, or by relying on a relevant adequacy decision by the European Commission or on other legal grounds or conditions, always in accordance with applicable Data Protection Legislation.

Where we feel it is necessary or appropriate we may seek to rely on Your consent as the legal basis for transferring Your personal data to outside the EEA, however we do not generally do so. Where we do, You may withdraw Your consent at any time.

### Opting out

Where required by Data Protection Legislation, You will be given a choice when You provide us with Your personal information to opt in or opt out of receiving marketing communications.

You have the option of "unsubscribe" from our mailing list for marketing communications, alerts and updates at any time, thereby disabling any further marketing e-mail communication from being sent to You.

Details of how to unsubscribe will be included on each electronic mailing we send You. Alternatively, by writing to or emailing us at [Admin@izzyremit.com](mailto:Admin@izzyremit.com) with "UNSUBSCRIBE REQUEST" in the subject line and the email address that You wish to be removed within the email.

We will action any opt out request from You without delay.

### Your rights

At any time, You have the right:

- to be informed about the processing of Your personal data (i.e., for what purposes, what type of personal data, to what recipients it is disclosed, storage periods, any third-party sources from it was obtained, confirmation of whether we undertake automated decision-making, including profiling, and the logic, significance and envisaged consequences). Reading this Privacy Policy forms part of Your right to be informed;
- to request access to or a copy of any personal data which we hold about You;
- to rectification of Your personal data, if You consider that it is inaccurate or not up-to-date;
- to ask us to delete Your personal data, if You consider that we do not have the right to hold it;

- to withdraw consent to our processing of Your personal data (to the extent such processing is based on previously obtained consent);
- to ask us to stop or start sending You marketing messages at any time by using the below contact details;
- to restrict processing of Your personal data;
- to data portability (moving some of Your personal data elsewhere) in certain circumstances; and
- to object to Your personal data being processed in certain circumstances.

You can contact us by writing to or emailing us at [Admin@izzyremit.com](mailto:Admin@izzyremit.com) if you want to enforce any of these rights. We will comply with our legal obligations as regards Your rights as a data subject.

Any request for access to Your personal data must be in writing and we will endeavour to respond within a reasonable period and in any event within one month (three months for complex or numerous requests), in compliance with Data Protection Legislation. We reserve the right to charge a reasonable fee (reflecting the costs of providing the information) or to refuse to respond where requests are manifestly unfounded or excessive: in this case, we will explain the situation to You and we will inform You about Your rights.

We aim to ensure that the information we hold about You is accurate at all times. To assist us in ensuring that Your information is up to date, You will need to let us know if any of Your personal details change. Upon your request, we will take reasonable steps to ensure that the data is accurate, and we will rectify any personal data that is incorrect promptly and in any case within one month of Your request.

### Changes to this Privacy Policy

Any changes we make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to You by e-mail. Please check back frequently to see any updates or changes to our Privacy Policy.

## Complaints

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to:

**Easyremit Limited**

**48 Downsview Road**

**London SE19 3XB**

**United Kingdom**

Email: [Admin@izzyremit.com](mailto:Admin@izzyremit.com)

You may also use these contact details if You wish to make a complaint to us relating to Your privacy.

If You have any concerns about our use of Your information, You also have the right to make a complaint to:

- the Information Commissioner's Office, which regulates and supervises the use of personal data in the United Kingdom, via their helpline on 0303 123 1113;