

Online Privacy Statement

Data Controllers	Western International Bank GmbH, UK Branch Custom House Financial (UK) Limited
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Effective Date: 14 February, 2018

Western Union Business Solutions (WUBS) is a division of The Western Union Company.

This Privacy Statement describes how WUBS collects and uses your personal information that we obtain when you visit or use our website, or that we otherwise collect in connection with enrolling or providing online services. "Personal information" means all information that relates to an identified or an identifiable individual.

INFORMATION WE COLLECT:

We collect personal information about you when you visit our website, when you enroll for our services, when you use our online or offline services, or when you contact us. We may use this personal information along with other information collected or generated during our relationship with you. We collect your contact information, information about your use of our services, details of any payors or beneficiaries or yours, and marketing choices. Additionally, we collect personal information from you in the following ways:

- Through online forms, loyalty and rewards programs, and other online services we offer (some of which may be managed by third parties on our behalf);
- While providing customer support, consultation, live chat, or other interaction;
- Through the process of maintaining and upgrading our services;
- Through means such as communications protocols, e-mail communications and cookies;
- Through our mobile applications (some of which may be managed by third parties on our behalf);
- Through your use of social media or other public data sources;
- Through your interest in Western Union advertisements placed on third party sites; and
- When information is provided to us from third parties authorized under applicable law to initiate transactions or perform account-related services on your behalf, such as account information service providers or payment initiation service providers.

When you use our websites, mobile apps, or online services, we also collect personal information about the domain and host from which you access the Internet, your computer's IP address or device advertising ID, mobile device geolocation, information about your device (such as device properties, settings, applications, stored information and usage), browser and operating system software, social profile and network information where applicable, the date and time you access our websites and the address of the site from which you linked to our website when you visit us. We collect personal information on your online activity as described in the paragraph below titled "**COOKIES AND INTERNET TECHNOLOGY.**"

To conduct a payment or money transfer, or to enter into a foreign exchange derivative contract with us and thus enable you to become a client, you must provide certain information required by us to execute the transaction and to enable us to comply with our legal obligations associated with providing our services. Failure to provide some of your personal information may affect our ability to provide our services to you. We will inform you when information is required in order to use our services.

In addition to the personal information we collect from you, we also collect your personal information from Western Union or WUBS affiliates or from third parties, such as the person to whom you send and/or receive money, as well as our agents, service providers, business partners, identity verification companies, payments and fraud risk management companies, law enforcement and regulatory bodies, and commercial and public data sources. We may also conduct credit reference checks on you and your business using a licensed credit reference agency.

Information you provide to us about other people: In order to make payments to people using our services, you need to provide us with certain information about the individual or business that you wish to make a payment to. At times, we also collect information directly from someone paying money to you. This information is necessary for us to provide the service and comply with our legal and regulatory obligations. Failure to provide some of the information affects our ability to provide our services to you and your payor or beneficiary, and we will inform you when information is required in order to provide our services. In addition to the information you provide to us, we will also collect information from commercial and public data sources, law enforcement and regulatory bodies, and verification, fraud and risk management companies as part of providing the services.

LEGAL BASES AND LEGITIMATE BUSINESS PURPOSES FOR WHICH WE USE PERSONAL INFORMATION:

We use the information you provide and that we collect from other people for the following legal bases and legitimate business purposes (excluding personal information of non-client payors or payees):

Providing our services to you: This includes using information necessary performing contracts or for taking steps to enter into a contract with you, including conducting money transfers, payment services, or delivering other products or services.

Legal and compliance purposes: This includes using your personal information to comply with legal and regulatory duties, such as anti-money laundering and counter-terrorist financing, detection, prevention and prosecution of fraud and theft as well as preventing illegitimate or prohibited use of our services. This may also include establishing, exercising, or defending legal rights and claims, monitoring and reporting compliance issues, or responding to legal process. Additionally, this includes using your details to validate and authenticate your identity and using third parties to help us do this, as well as retaining records containing your personal information as required under applicable law.

Legitimate business purposes: We use your personal information to analyze and improve our products, locations, services, operations, the running of our websites and your customer experience. This may include using your information to conduct market research surveys. We also use your personal information to provide customer service, to conduct other administrative tasks necessary to provide our services, to help manage risks related to security, fraud and identity, and to protect the security and integrity of our technology, systems, and services. We conduct analysis of the information we hold to better understand our customers, including profiling analytics to help us target marketing and tailor our products and services to your needs and requirements. We combine personal information you provide with information from other products and services and convenience and/or rewards programs for which you have registered. We may also conduct credit checks on you and your business using a licensed credit reference agency. Subject to your choices and based on the contact information you provide, we send commercial communications or offers by email, telephone, post, SMS, social media or other communication channels.

COOKIES & INTERNET TECHNOLOGY

We use internet technologies like cookies and web beacons for a variety of purposes, including, but not limited to those identified below.

- To assist us in providing services to you and help you to receive the best experience using this website;
- To allow you to change webpages during your visit without having to re-enter your password;
- To track activity on our website;
- To determine whether you came to our site from a banner ad or an affiliate website;
- To deliver information specific to your interests on additional websites;
- To better understand the effectiveness of our promotional campaigns and whether you acted on our promotional messages; or
- To identify you when you visit the website, to personalize the content of the website for you and to assist you in carrying out transactions and accessing account information.

WUBS has implemented the capability for the user to manage cookies on our websites. We will only place or read cookies based on your preference level, **(note: cookies set prior to you changing your preference level are maintained on your computer; to remove them please refer to your browser settings or your browser's "Help" function)**. If your browser does not support JavaScript, you can find out about the cookies used on our sites and can only manage the use of cookies on our sites, through your web browser settings. Please note that if you disable all cookies on your browser, this will limit the features of this site and may impact the ability to complete your transaction.

For more information on how Western Union Business Solutions uses cookies [click here](#).

EXTERNAL WEBSITES

WUBS's website may be linked to or from third party websites. WUBS is not responsible for the content or privacy practices employed by websites that are linked to or from our website.

CONFIDENTIALITY AND SECURITY

We maintain physical, technical, organizational and procedural safeguards that are designed to comply with applicable government laws and regulations to guard your personal information. We also generally restrict access to personal information to our employees, agents and representatives that need to know it. Despite our efforts, and as you probably know, third parties may unlawfully intercept or access transmissions sent to us or may wrongly instruct you to disclose personal information to them while posing as WUBS. Always use caution and good judgement when using the Internet or mobile technologies. For more information [click here](#).

DISCLOSURE OF YOUR INFORMATION

If there is a reasonable need to do so for any of the purposes listed above, we may disclose or provide access to your personal information including, but not limited to, your name, customer ID number, address, transaction patterns and bank account information to the following types of organizations or parties:

- Western Union group companies, including but not limited to, Western Union International Bank GmbH (Austria), Western Union Financial Services, Inc (USA), and Custom House Financial (UK) Limited;
- Our agents or business partners who facilitate the specific service or money transfer transaction you have requested;
- Service providers, payments processors, banking partners and data processors contracted to provide business services to us;
- Service providers and data processors contracted to help us validate the accuracy of the information provided by you, including to authenticate your identity and manage risks related to security, fraud, money laundering and identity.

- Service providers, vendors, or other business partners engaged to provide other services to us related to the purposes outlined above, including providing customer service, providing commercial communications, or conducting customer satisfaction research on our behalf.
- Third parties that you have authorized to access your account and/or your account information in order to perform services for you, such as account information service providers and payment initiation service providers.

We may also disclose your personal information globally, as required or permitted by applicable laws and regulations, to regulatory and financial authorities, law enforcement bodies, courts, governments or government agencies, to meet compliance and legal obligations or to assert or defend the rights and interests of Western Union or others. We may transmit personal information we possess in connection with a sale or transfer of all or part of our business. We may disclose information about whether you are making payments owed to us, any debt you have with us, and any suspected or proven fraud to one or more licensed credit reference agencies on a one-off or ongoing basis.

INTERNATIONAL TRANSFER

We transfer your information to Western Union group companies or to third parties in countries outside the European Economic Area (EEA), including but not limited to the USA, as required or permitted by applicable law, regulatory authorities, law enforcement and government agencies. Additionally, when you send or receive money to or from another country, we may send some of your personal information to country as required or permitted by law. We transfer certain personal information about you to data centres in the USA and process it to fulfil our legal and compliance obligations which apply to the services we provide.

The privacy law in countries to which personal information is transferred may not provide the same level of data protection as is in force within the EEA. If this is the case, personal information transferred outside the EEA will be protected by EU-approved mechanisms for transferring data internationally, including appropriate contractual clauses, as required by law. You can request to see these mechanisms using the contact details in the Contact Us section.

CHOICE AND OPT-OUT

Subject to your choices and based on the contact information you provide, we may send you commercial communications about our and third party products and services, which may include offers by email, telephone, post, SMS, social media and other communication or digital channels. You can opt out of receiving marketing communications at any time. Marketing communications we send will generally have opt-out options, and you may also opt out by contacting us as outlined below. Please note that if you choose to withdraw your consent, you may not be able to participate in or benefit from our programs, services and initiatives for which you provided consent.

RETENTION OF PERSONAL INFORMATION

Your personal information will be retained in accordance with statutory periods contained in regulations applicable to financial transactions, including those in anti-money laundering, anti-terrorist financing and other laws applicable to us. Otherwise, we will retain your information only as long as necessary for the specific purposes it was collected, or to resolve any query you may raise. As a general rule, we will typically keep your information for no longer than 7 years after a given transaction, unless we have a legal obligation to keep it for a longer period.

YOUR RIGHTS

You have the right to know if we are processing your personal information, and to ask us for a copy of your information free of charge. You have the right to request a structured and machine-readable copy of

certain information you have provided to us. We may charge you a reasonable fee for providing the information, or not act upon your request, if the request is manifestly unfounded or excessive. You have the right to stop us sending you marketing communications. You have the right to ask us to correct information about you that is incomplete, inaccurate or out-of-date. You have the right to ask us to erase certain information about you, to restrict certain uses of your information, and also to object to certain uses of it. You also have the right to lodge a complaint with a supervisory authority about our processing of personal information. When we receive a request, we may ask for additional information from you to verify your identity.

To exercise these rights, please contact us through the following channels:

On-Line Service Customers:

E-mail: online@westernunion.com

In country: 0011 808 234 3943

From outside: +1 732 694 2257

Corporate and Personal Payments Customers:

E-mail – wubsprivacy@westernunion.com

By Mail:

Customer Care
Western Union Business Solutions
Worldwide House, Thorpe Wood, Peterborough, Cambs, PE3 6SB

or by using the **Contact Us** section of our website. We will endeavour to respond to your request within one month but may be entitled to extend this period in certain circumstances. We will comply with your request to the extent required by applicable law.

If you have an inquiry or complaint about how WUBS has responded to a request you have made, or about how we handle your personal information, we ask that you put your message in writing. We will investigate your complaint and generally respond to you in writing within 30 days of receipt.

CHANGES

WUBS reserves the right to modify this Privacy Statement. Updated privacy statements will be posted on this Website when amendments occur. If we have contractually committed to notify you of changes to this Privacy Statement, we will do so within a reasonable time of such changes. We urge you to review this Privacy Statement when you visit to obtain the most current statement.