

# On-Line Privacy Statement

Western Union International Bank GmbH, Italy branch

Custom House Financial (UK) Ltd

## Effective Date: 1 April 2016

In Italy, services are provided by Western Union International Bank GmbH, Italy branch doing business as Western Union Business Solutions. Western Union Business Solutions is a division of The Western Union Company. This On-Line Privacy Statement applies to users of this website, and to all customers of Western Union International Bank GmbH, Italy branch (hereinafter referred to as “Western Union Business Solutions”).

This On-Line Privacy Statement describes how Western Union Business Solutions collects, transfers, uses, and discloses personal information (“Information”) that we obtain from you when visiting and/or using this website or that we otherwise collect in connection with enrolling or providing services to our customers.

## INFORMATION WE COLLECT

Western Union Business Solutions collects Information about you from a variety of sources, including but not limited to those listed below. We collect Information:

- That you supply when you submit Information on applications or other forms to Western Union Business Solutions or to our Affiliates (“Affiliates”) or when you otherwise submit Information to us, our Affiliates or others;
- About your transactions with us, our Affiliates, or others;
- About you from a variety of third party sources such as our business customers, government agencies and consumer and credit reporting agencies and other suppliers of public information to assist us in providing you with the products and services requested or to assist us in running our business;
- When we are required to do so by law and as part of compliance programs, in particular those related to anti-money laundering, prevention of crime, and fraudulent activity;
- From computer and mobile devices such as the domain and host you use to access the Internet; your computer’s IP address; mobile device geolocation, number and other information from and about your device (such as device properties, settings, applications, stored information and usage) and carrier; the browser and operating system software you use; social profile and network information; the date and time you access our website and the Internet address used to link to our website when you visit us;
- About your bank, payment card and other payment details when you use our services and for future transactions and services; and
- About your online activity as described in the paragraph below titled “**COOKIES AND INTERNET TECHNOLOGY.**”

You agree to the processing of your Information for the purposes and ways described in this Privacy Statement including the transfer of your Information outside of the European Economic Area (EEA) to countries including but not limited to, the United States.

The Information we collect includes, but is not limited to, name, address, and telephone number, identification required to send or receive a transaction including a copy of the identification document, transaction activity, bank account and payment information, and computer information such as the domain and host you use to access the Internet.

## USE OF INFORMATION

At Western Union Business Solutions, we use the Information that we obtain for the following activities:

- To provide and assist us in managing and delivering any products and services to you (including cross-border business payments, management of foreign exchange, and other products or services) and to help us to improve and develop these services;
- To send you commercial communications, subject to any choices you have made, about Western Union Business Solutions or third party products and services, or other updates;
- To verify any of the Information that you provided in order to effect, administer and enforce transactions, to manage our customer relationships, to provide you the requested products and services, to confirm your eligibility for any services or products you apply for, and to maintain the accuracy of our records;
- To comply with legal and regulatory obligations including those aimed at preventing money laundering and related criminal or fraudulent activity;
- To allow you to receive the best experience using this website; to track activity on our website; to better understand the effectiveness of our promotional campaigns; to determine whether you came to our site from a banner ad or an Affiliate website; to deliver information specific to your interests; and
- To improve the running of this website, to improve the customer experience and the operation of our business.

## 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;
- To allow you to move between web pages during your visit without having to re-enter your password;
- To temporarily 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; and
- 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.

Western Union Business Solutions has implemented the capability for the user to manage cookies on our websites. We will only read or write 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**). 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 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 have an impact on the ability to complete your transaction.

## **INFORMATION WE DISCLOSE**

We may disclose Information to the following:

- Western Union group companies and Affiliates;
- Companies which help us to deliver products and services to you such as banks, credit card companies and credit reference agencies;
- Domestic and foreign governments, our Affiliates or service providers in order to comply with legal, regulatory, security and transaction processing requirements applicable to us, including but not limited to anti-money laundering laws;
- To organisations which help us to process transactions, validate customer information and help us to prevent debt, fraud, theft or loss;
- As permitted or required by any applicable laws and regulations.

Western Union Business Solutions and our Affiliates worldwide may disclose your Information, including but not limited to, your name, customer ID number, address, transaction patterns, and bank account information (i) if we are required to do so by domestic or foreign law or legal process or (ii) to law enforcement authorities or other government officials (including those in this country, the United States, or elsewhere) for purposes of detecting, investigating, prosecuting, and preventing crimes, including money laundering and related criminal activity, and the recipients may further disclose the Information for these and other related purposes.

## **CONFIDENTIALITY AND SECURITY**

We endeavor to maintain physical, technical and procedural safeguards that comply with applicable government laws and regulations to guard your Information. We also endeavor to restrict Information access to our employees, agents and representatives who need to know it. Despite our efforts, third parties may unlawfully intercept or access transmissions sent to us or may wrongly instruct you to disclose Information to them while posing as Western Union Business Solutions. Always use caution and good judgment when using Internet or mobile technologies.

## **PERSONAL CHOICE**

Where you have provided us with your consent to use, store or disclose your Information, you have the right to withdraw your consent at any time by using the contact details below. If you do withdraw your consent, we will cease using that Information unless we are required to continue to do so by law.

Western Union Business Solutions maintains your choice and transaction history based on our record retention policies. If you do not perform another transaction within the retention time period, your Information, as well as your choice, will be removed.

## **ACCURACY OF INFORMATION**

You may request (by contacting us in the manner set out below) details of the Information that we hold about you and request us to correct or erase any erroneous or out-of-date Information. We reserve the right to independently verify claims made. To protect your privacy, we will also take reasonable steps to verify your identity before making any corrections. Where permitted by law, we reserve the right to assess a service charge for providing you with any Information in connection with your request.

## **EXTERNAL WEB SITES**

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

## **CHANGES**

Western Union Business Solutions reserves the right to modify this Privacy Statement. Updated Privacy Statements will be posted at this website when amendments occur. We urge you to review this Privacy Statement when you visit to obtain the most current statement.

## **CONTACT US**

To provide your personal choice, to request information stored about you, or for any questions or queries related to this privacy statement, please contact us through the following channels:

### **Western Union Business Solutions Individual and Business On-Line Customers:**

E-mail: [online@westernunion.com](mailto:online@westernunion.com)

In country: 0 800 789 936

From outside: +32 2 643 87 07

### **By Mail:**

Privacy Office  
Via Virgilio Maroso, 50  
Rome 00142

OR

Western Union Privacy Office  
12500 E Belford Ave.  
Englewood, Colorado 80112  
Mail Code: M22B3  
USA

Western Union Business Solutions is a division of the Western Union Company. In Italy, services are provided by Custom House Financial (UK) Limited (which does business under the trade name of Western Union Business Solutions) or Western Union Business Solutions (UK) Limited or Western Union International Bank GmbH, UK Branch. Custom House Financial (UK) Limited (registered in England, Company Number 04380026, Registered Office Address: 12 Appold Street, London EC2A 2AW) is authorised by the Financial Conduct Authority under the Payment Services Regulations 2009 (Register Reference: 517165) for the provision of payment services and is registered as an MSB with HM Revenue & Customs (Registered No: 12140130). Western Union Business Solutions (UK) Limited (registered in England, Company Number 02854737, Registered Office Address: 12 Appold Street, London, EC2A 2AW) is authorised by the Financial Conduct Authority under the Payment Services Regulations 2009 (Register Reference: 536611) for the provision of payment services and is registered as an MSB with HM Revenue & Customs (Registered No: 12122416).

Western Union Business Solutions provides Foreign Exchange Options services in Italy through Western Union's wholly owned subsidiary Western Union International Bank GmbH, Italy Branch. Western Union

International Bank GmbH, UK Branch (Branch address: 12 Appold Street, London, EC2A 2AW) is a branch of Western Union International Bank GmbH (registered in Austria, company number FN256184t Schubertring 11, 1010, Vienna Austria).