



eversend

PRIVACY NOTICE

(Updated on 11 November 2022)

Table of Contents

1. Introduction	3
2. About Us	3
3. What this Notice Applies to	3
4. Personal Data we collect about you	4
5. Legal basis for using your personal data	8
6. How and why we use your personal data	8
7. Automated Processing	13
8. Marketing	14
9. Your rights	15
10. Exercising your rights	17
11. Sharing your Data	18
12. Where we store your data	20
13. Data Security	20
14. How long do we keep your personal data.	21
15. Changes to this notice	21
16. Cookies	21

1. Introduction

At Eversend, we care about the privacy of the people who use our Services and interact with us, and this notice explains how we deal with the personal information that you give us.

This notice applies to the use of our services, for example visiting our website, using the Eversend App, any of the services available to you through the Eversend App or website.

We take your privacy very seriously. Please read this privacy notice carefully as it contains important information on who we are and how and why we collect, store, use and share any information relating to you (your personal data) in connection with your use of our services. It also explains your rights in relation to your personal data and how to contact us or a relevant regulator in the event you have a complaint.

2. About Us

The Eversend group is made up of **different companies**. We'll let you know which Eversend Company you have a relationship with when you first apply for use of an Eversend product or service.

The Eversend company providing the relevant product or service to you will be responsible for processing your personal data for that product or service. This Eversend Company is known as the 'Controller' of your personal data.

3. What this Notice Applies to

This notice applies to:

- Our website accessible at www.eversend.co;
- The Eversend App;
- Any of the services available to you and accessed through the Eversend App or website or through USSD.

We may also collect your personal data from other sources. We explain how and when this can happen in the subsequent parts of this notice.

Depending upon which of our products or services you use or how you contact us we may also need to provide you with additional information about the use of your **personal data** – this extra information shall always be availed to you before we collect any of your data.

By personal data, we mean information which:

- We know about you (for example we know when you use the Eversend App to send money)
- Can be used to personally identify you (for example, a combination of your name and telephone number or email address)

This notice explains what information we collect, how we use it, and your rights if you want to change how we use your personal data.

If you have any questions or concerns in relation to your personal data, you can contact our Data Protection Officer mailto: paul@eversend.co.

4. Personal Data we collect about you

The personal data we collect about you depends on the particular Eversend product and services you request or use. We will collect and use the following personal data about you:

Type of Personal Data	Details of Personal Data Collected
Information you give us “Submitted Information”	<p>We Collect information you provide when you:</p> <ul style="list-style-type: none"> • Fill in any forms • Correspond with us • Participate in any of our surveys or promotions • Register to use the Eversend App • Open an account or use any of our services • Take part in online discussions including engagements with our social media accounts • Speak with a member of our customer support through mail, social media, phone or through the Eversend App • Contact us for other reasons • Top-up, send money (mobile money and bank transfer) and electronic money exchange <p>The information we collect includes:</p> <ul style="list-style-type: none"> • Your name, address and date of birth • Your email address, phone number, email address and details of the device

	<ul style="list-style-type: none"> ● Your Eversend username, when you create and Eversend tag ● Your registration information ● Details of your credit and debit cards you have registered with us including the card number, expiry date and CVC (the last three digits on the back of the card) ● Your country of residence, tax identification number ● Copies of your identification documents ● Details of your bank account, including the account number, sort code and IBAN ● Records of your communication with us, if you contact us or we contact you (including records of phone calls) ● Your image in photo or video form submitted as part of our KYC (Know-Your-Customer) checks, to verify your identity and when you upload a photo to your Eversend account. ● Details of your beneficiaries submitted when processing a payment or money transfer ● And any other information you provide us in order to prove your eligibility to use our services.
<p>Information collected from your use of our products and services</p>	<p>Whenever you use the Eversend App or visit our website, we collect the following information:</p> <ul style="list-style-type: none"> ● Technical information, including the internet protocol (IP) address used to connect your device to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, device information and type, unique device identifier (for example, your Device's IMEI number, the MAC address of

	<p>the Device's network interface, or the mobile phone number used by the Device), mobile network information and operating system</p> <ul style="list-style-type: none"> • Information about your visit, including the full uniform resource locators (URL), clickstream to, through and from our website (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain page, device information • Transaction information including date, time, amount, currencies used, exchange rate, beneficiary details, IP address of sender and receiver, sender's and receiver's name and registration information, messages sent or received with the payment, device information used to facilitate the payment instrument used • Information stored on your Device, including if you allow Eversend access contact information from your address book, login information, photos, videos or other digital content, check-ins (Content Information). The App will periodically recollect this information in order to stay up-to-date • Details of your use of our App or your visits to our Site including transaction details relating to your use of our services, including who you have sent money or electronic money to, foreign exchange transactions you have entered into, the time, date and location of the place the transaction was entered into
<p>Information about your location</p>	<p>We use GPS technology and your IP address to determine your location, this is used when the App is running in the foreground and the</p>

	<p>background of your Device. This is used to prevent fraud, for instance, if your mobile phone is saying that you are based in France but your information is being used to enter into a transaction in Italy, we may not allow that transaction to be processed.</p> <p>Our card protection and fraud-prevention measures require this personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose.</p> <p>You can withdraw your consent at any time by disabling location permission for the Eversend App within your device settings "Location Information"</p>
<p>Information to help us deliver our products and services</p>	<p>We work closely with third parties in order to help us deliver our services to you. These third parties are business partners (such as those we partner with to offer additional Eversend Services like credit), sub-contractors in technical, payment and delivery services, advertising networks , analytics providers, search information, information which helps us to verify your identity or information relating to your payment transactions.</p> <p>Please see the 'Disclosure of your information' section for more information.</p>
<p>Information from Social Media</p>	<p>Occasionally, we'll use publicly available information about you from selected social media websites or apps to carry out enhanced due diligence checks. Publicly available information from social media websites or apps may also be provided to us when we conduct general searches on you (for example to comply with our anti-money laundering or sanctions screening obligations).</p>

Information from publicly available sources	We collect information and contact details from publicly available sources, such as media stories, online registers or directories and websites for enhanced due diligence checks, security searches and KYC purposes
---	---

5. Legal basis for using your personal data

We must have a legal basis for collecting and using your personal data. Our legal basis is for either of the following:

- **Performing our contracts and agreements with you**
We need certain personal data to provide our products and services and cannot provide them without this personal data.
- **Legal obligations**
We have a legal responsibility to collect and store your personal data (for example under the anti-money laundering laws, we must collect and hold certain information about our customers and users of our products.
- **Legitimate interests**
We collect and use your personal data because we have a legitimate reason justifiable law to use it and this is reasonable when balanced against your human rights and freedoms.
- **Substantial public interest**
Where we process your personal data or your sensitive personal data (sometimes known as special category personal data), to adhere to government regulations or guidance, such as our obligation to support you if you are or become a vulnerable person.
- **Consent**
Where you have agreed to use collecting your personal data for example when you click the agree button to indicate you are happy with us collecting and using your personal data subject to the terms disclosed to you.

6. How and why we use your personal data

We explain the ways in which we may use your personal data in the following table:

What we use your personal data for	Our legal basis for using your personal data
<p>Providing our services</p> <p>Whenever you sign up with Eversend, apply for or use a product or service, we'll use your personal data to:</p> <ul style="list-style-type: none"> • Check your identity (as part of our KYC process) • Decide whether or not to approve your application • Meet our contractual and legal obligations relating to any products or services you use (for example making payments into and out of your Eversend wallet(s), withdrawing cash or making payments using your Eversend card) • Help you understand your spending behaviour, how you use Eversend products and services, and to help you save money (for example by providing you with product usage and spending insights) • Recover debt and exercise other rights we have under any agreement with you • Provide you with customer support services. We may record and monitor any communications with us including phone calls, to maintain appropriate records, check your instructions, analyse, assess and improve our services, and for training and quality control purposes. 	<ul style="list-style-type: none"> • Performing contracts and agreements between you and us • Legitimate interests (we need to be efficient about how we meet obligations and we want to provide you with better products and services) • Legal obligations
<p>Protection against fraud</p>	<ul style="list-style-type: none"> • Legitimate interests (to develop and improve how

<p>We use your personal data to check your identity against fraud, comply with financial crime laws and to confirm that you are eligible to use our services. We also use it to help us better understand your financial circumstances and manage fraud risks related to your Eversend account.</p>	<p>we counter financial crime and meet our legal responsibilities</p> <ul style="list-style-type: none"> • Legal obligations
<p>Marketing and providing products and services that might be of interest to you</p> <p>We use your personal data for the following:</p> <ul style="list-style-type: none"> • To personalise your in-app experience (set up the appropriate wallet(s) corresponding to your location) and marketing messages about our products and services so they are more relevant and interesting to you (where the law permits). This may include analysing how you use our products and services and your transactions. • If you agree, provide you with information about our partners' promotions or offers which we think you might be interested in • If you agree, allow our partners and other organisations to provide you with information about their products or services • Measure and understand the effectiveness of our marketing and advertising, and provide relevant advertising to you. • Ask your opinion about our products or services (reviews) <p>You can stop us from sending you marketing messages by clicking the unsubscribe button</p>	<ul style="list-style-type: none"> • Legitimate interests (to send direct marketing, ensure our direct marketing is relevant to your interests, develop our products and services, and to be efficient about how we meet our legal and contractual duties. • Consent (where we are legally required to collect your consent to send you direct marketing about our products or services or partners' promotions or offers or for you to receive marketing from other organisations)

<p>at the bottom of any last message marketing message to you.</p>	
<p>To keep our services up and running</p> <p>We use your personal data to manage our website and the Eversend app, (including troubleshooting, data analysis, testing, research, statistical and survey purposes), and to make sure that content is presented in the most effective way for you and your device.</p> <p>We also use your personal data to:</p> <ul style="list-style-type: none"> • Verify your identity if you contact our customer support • Allow you to take part in interactive features of our services • Inform you about changes to our services • Help keep our website and Eversend app safe and secure 	<ul style="list-style-type: none"> • Performing contracts and agreements between you and us • Legitimate interests (to be efficient about how we meet our obligations and keep to regulations that apply to us and to present content as effectively as possible for you) • Consent (where required by law)
<p>Helping with social interactions</p> <p>We use your personal data to help with social interactions through our services or to add extra functions in order to provide a better experience (for example, if you permit us, we use the contacts list on your phone so you can easily make payments to your contacts from the Eversend app.</p>	<ul style="list-style-type: none"> • Legitimate interests (to develop our products and services and to be efficient in meeting our obligations) • Consent (to access information held on your phone, for example contacts lists, and your location services)
<p>Providing location-based services</p> <p>If you grant the Eversend app location services access, we use your personal data to:</p>	<ul style="list-style-type: none"> • Performing contracts and agreements between you and us • Consent (to track you when you have location services turned on)

<ul style="list-style-type: none"> • Provide you with products and services • Protect against fraud 	
<p>Preparing anonymous statistical datasets</p> <p>We prepare anonymous statistical datasets about our customers' usage of the Eversend App and our website:</p> <ul style="list-style-type: none"> • For forecasting purposes • To understand how customers use Eversend • To comply with regulatory requirements and requests <p>These datasets may be shared internally or externally with others subject to confidentiality undertakings. We produce these reports using information about you and other customers. The information used and shared in this way is never personal data and you will never be identifiable from it and nor can it be linked back to you as an individual.</p> <p>For example, in some jurisdictions we have an obligation to report how money enters or leaves each country or how Eversend customers fund their accounts or transfer money. This information is not provided at customer level and it we make it impossible to identify any individual Eversend customer</p>	<ul style="list-style-type: none"> • Legal obligations • Legitimate interests (to conduct research and analysis including to produce statistical research and reports)
<p>Improving our products and services</p> <p>We use your personal data to help us develop and improve our current products and services. This allows us to continue to provide products and services that our customers want to use</p>	<ul style="list-style-type: none"> • Legitimate interests (to understand how customers use our products so we can develop new products and improve the

	products we currently provide)
<p>Meeting our legal obligations, enforcing our rights and other legal uses</p> <p>We use your personal data:</p> <ul style="list-style-type: none"> • To share it with other entities (for example, government authorities, law enforcement authorities, tax authorities, fraud prevention agencies) • To recover debts from you • If it is necessary to meet our legal obligations • To identify and support vulnerable customers by analysing your behaviour in the Eversend app, customer support communications and through transactions (for example, we will try to identify whether you are potentially vulnerable so we can provide you with enhanced support. Identifying and supporting customer is a legal requirement in some jurisdictions) • In connection with legal claims • To help detect or prevent crime <p>Sometimes, we are legally required to ask you to provide information about other people. For example, we might ask you to explain:</p> <ul style="list-style-type: none"> • Your relationship with a recipient or sender of funds in your Eversend wallet • How somebody got the money in the first place to pay into your Eversend wallet 	<ul style="list-style-type: none"> • Legitimate interests (for example to protect Eversend during a legal dispute) • Substantial public interest (if we process your sensitive personal data to keep to legal requirements that apply to us) • Legal obligations

Sometimes, we help you to provide services to your customers. For example, we provide payment processing to you if you use our Eversend Business product. Where this happens, you are responsible for deciding if we collect your customers' personal data and how we should process it on your behalf.

7. Automated Processing

Depending on the Eversend products or services you use, we may make automated decisions about you.

This means that we may use technology that can evaluate your personal circumstances and other factors to predict risks or outcomes. This is what is known as '**profiling**'. We do this for the efficient running of our services and to ensure decisions are fair, consistent and based on the right information free from human error and bias.

Where we make an automated decision about you, you have the right to ask that it is manually reviewed by a natural person.

We may make automated decisions about you in the following instances:

Opening accounts

- KYC, anti-money laundering, PEP and sanction checks
- Identity and address checks

Transaction monitoring

- Set transaction limits and checks
- Process and approve transactions

Detecting fraud

- Monitoring your account to detect fraud and financial crime

Approving loan applications

- Loan and affordability checks to see whether we can accept your loan application
- Setting loan limits

Monitoring loan agreements

- Assessing how you are repaying your loan with us
- Amending your loan limit
- Terminating your loan agreement

Our legal basis for the above is based on:

- Performing contracts and agreements between you and Eversend

- Legal obligations
- Legitimate interests (to develop and improve how we deal with financial crime and meet our legal responsibilities)

8. Marketing

If you sign up to our services, and where national laws allow, we assume you want us to contact you by post, push notifications, email and text message about Eversend products, services, offers and promotions. Where national laws require us to get your consent to send marketing messages, we shall do so in advance.

We use your personal data to personalise marketing messages about our products and services so that they are more relevant and interesting to you (where permitted by law). This may include analysing how you use our services and your transactions.

You can object to profiling for direct marketing purposes. You can also adjust your preferences or inform us that you don't want to hear from us at any time. Just tap the unsubscribe links in any of the marketing messages we send you. No further marketing messages will be sent to you, although you may still receive generic information about our products in the Eversend app.

We do not share any of your details with any third party for marketing purposes without your permission.

Our legal basis for using your details for marketing is:

- Consent (where we are required by law to collect your consent); or
- Legitimate interests (to send your marketing and to provide information relevant to your interests)

9. Your rights

As a data subject, you are granted particular rights under law in respect of your personal which rights we uphold, and we are required to inform you of your rights as shown in the table below:

Your Rights	What they mean
You have the right to be told how we use your personal data	We provide this privacy notice to explain how we use your personal data.
	If you ask, we shall provide a copy of the personal data we hold about you. We cannot give you any personal data about other people,

	<p>personal data which is linked to an ongoing criminal or fraud investigation, or personal data which is linked to settlement negotiations with you. We also won't provide you with any communication we have had with our legal advisors.</p>
<p>You can ask us to correct your personal data if you think it is wrong</p>	<p>You can have incomplete or inaccurate personal data corrected. Before we update your file, we may need to check the accuracy of the new personal data you have provided.</p>
<p>You can ask us to delete your personal data</p>	<p>You can ask us to delete your personal data if:</p> <ul style="list-style-type: none"> • There's no good reason for us to continue using it • You gave us consent to use your personal data and you have now withdrawn the consent • You have objected to us using your personal data • We have used your personal data unlawfully • The law requires us to delete your personal data <p>Note: We may not be able to agree to your request. As a regulated financial services provider, we must keep certain customer personal data even when you ask us to delete it. If you have closed your Eversend account, we may not be able to delete your entire file because there regulatory obligations take priority. We'll always let you know if we can't delete your personal data</p>
<p>You can object to us processing your personal data</p>	<p>You can tell us to stop using your personal data, including profiling you for marketing.</p>

	<p>If our legal basis for using your personal data is 'legitimate interests' and you disagree with us using it, you can object.</p> <p>However, if there is an overriding reason why we need to use your personal data, we will not accept your request.</p> <p>If you object to us using your personal data which we need to provide our services, we may need to close your account as we won't be able to provide the services.</p>
<p>You can ask us to restrict how we use your personal data</p>	<p>You can ask us to suspend using your personal data if:</p> <ul style="list-style-type: none"> • You want us to investigate whether it's accurate • Our use of your personal data is unlawful but you don't want us to delete it • We no longer need your personal data, but you want us to continue holding it for you in connection with a legal claim • You have objected to us using your personal data, but we need to check whether we have an overriding reason to use it.
<p>You can ask us to transfer your personal data to you or another company</p>	<p>If we can, and are allowed to do so under regulatory requirements, we'll provide your personal data in a structured commonly used, machine-readable format.</p>
<p>Withdrawing your permission</p>	<p>If you have given us the consent we need to use your personal data, you can withdraw it at any time sending an email to info@eversend.co</p> <p>(please note, it is lawful to use the personal data to the point you withdraw your permission.)</p>

You can ask us to carry out a human review of an automated decision we make about you	If we make an automated decision about you that significantly affects you, you can ask us to carry out a manual review of this decision.
---	--

Your ability to exercise these rights will depend on a number of factors. Sometimes, we won't be able to agree to your request. (for example where the law requires to hold particular data for a certain period of time)

10. Exercising your rights

To exercise any of your rights set out in this notice, you can contact us in the Eversend app or send us an email at info@eversend.co.

For security reasons, we can't delete with your request if we are not sure of your identity. We may ask you for proof that you are authorised to act on your behalf by asking for an identifying document or any other information to help us confirm your identity and authority.

If a third-party exercises one of these rights on your behalf, we may need to ask for proof that they have been authorised to act on your behalf.

When you exercise one of your rights, it may take us up to one month to respond or implement your changes.

Eversend will usually not charge you a fee when you exercise your rights. However, we are by law allowed to charge a reasonable fee or refuse to act on your request if it is manifestly unfounded or excessive.

If you are unhappy with how we have handled your request, you can complain to your local data protection authority by lodging a complaint.

11. Sharing your Data

We share your data within the Eversend group of companies to:

- Provide you with the best service
- Send you information about Eversend products and services we think you will be interested in hearing about
- Complete your payment request

Other Eversend Customers

We'll ask you to let us sync your mobile phone contacts. This will help you to identify which of your contacts are Eversend customers. Your contacts will also

be able to see if you are an Eversend customer. This helps you easily make wallet to wallet payments.

We only show your basic contact details in the Eversend app, and you can also choose not to sync your contacts.

People or companies that you transfer money to

When you make a payment from your Eversend wallet, we'll provide the recipient with your details alongside your payment (for example your name and IBAN where applicable). This is because, like all payment institutions, we are required by law to include certain information with payments.

People or companies that transfer money to you

When you receive a payment to your Eversend wallet, we will provide the payer with your details for example your name, and IBAN where applicable. This is necessary to confirm the payment has been made to a correct account.

Suppliers

We normally share your personal data with certain suppliers that we normally refer to as partners as explained in the table below.

Type of Supplier	Why we share with them your personal data
Suppliers who provide us with IT, payment and delivery services	To help us provide our services to you
Our banking and financial services partners and payment networks including card providers	To help us provide our services to you. This included banking partners, banking intermediaries, aggregators and international payment service providers
Card manufacturing, personalisation and delivery companies	To create and deliver your personalised card
Analytics providers and search information providers	To help us improve our website or app
Communications services providers	To help us send you emails, push notification and text messages

We may also share your personal data with other financial institutions or Eversend customers, where you do not ask us. For example, if a payment is made to your wallet by mistake, we can share your information with the financial institution or Eversend customer, the payment came from. This helps the payer and the other financial institution to try and get the payment back themselves.

Other third parties

We may share your personal data with other third parties where necessary to facilitate you receiving payments to your Eversend wallet.

For legal reasons

We also share your personal data with other financial institutions, government authorities, law enforcement authorities, tax authorities, companies and fraud prevention agencies to check your identity, protect against fraud, comply to tax laws, anti-money laundering laws, or any other laws and confirm that you are eligible for our products and services

If fraud is detected, you could be refused certain services by Eversend or other companies.

We may also need to share your personal data with other third party organisations or authorities:

- If we have to so under any law or regulation
- If we sell or transfer our business
- In connection with criminal or fraud investigations
- To enforce our rights and those of our customers or others
- In connection with legal claims

Where you ask us to share your personal data

Where you direct us to share your personal data with a third-party, we may do so. For example, you may authorise third parties to act on your behalf (such as a lawyer, accountant, legal representative, guardian or holder of a power of attorney). We may need to ask for proof that a third party has been validly authorised to act on your behalf.

12. Where we store your data

We normally store the data in the country where it's collected, but we also have servers in the United Kingdom and the European Economic Area (EEA).

However, as we provide an international service, we may need to transfer your personal data outside your country or the United Kingdom and the EEA to help us provide our services.

For example, if you make an international payment, we'll send funds to banks outside your locality.

If we transfer your personal data to another country that doesn't offer a standard of data protection equivalent to your country's standard's or that of the United Kingdom and the EEA, we will make sure that your personal data is sufficiently protected. For example, we'll make sure that a contract with strict data protection safeguards is in place before we transfer your personal data. In most cases, you may be entitled to ask us for a copy of this contract.

If you would like more information, please contact us by sending an email to info@eversend.co.

13. Data Security

We recognise the importance of protecting and managing your personal data. Any personal data we collect and process is treated with the utmost care and security.

We use a variety of physical and technical measures to:

- Keep your personal data safe
- Prevent unauthorised access to your personal data
- Make sure your personal data is not improperly used or disclosed

Electronic data and databases are stored on secure computer systems with control over access to information using both physical and electronic means. Our staff receives data protection and information security training. We also have detailed security and data protection policies which staff are required to follow when they handle your personal data.

While we take all reasonable steps to ensure that your personal data will be kept secure from unauthorised access, we cannot guarantee it will be secure during transmission by you to our app or website or other services. We use secure communication protocols encrypted through transport layer security for secure communication over networks, for all our app, web and payment services.

If you use a password or pin for the Eversend app or website, you will need to keep that password or pin confidential. Please do not share it with anyone under any circumstances.

14. How long do we keep your personal data.

We generally keep your personal data for six years after our business relationship with you ends or such period as may be required by applicable local laws. However, some jurisdictions require us to keep your data for 8 years and some 10 years.

15. Changes to this notice

If we change the way we use your personal data, we'll update this notice and if appropriate, let you know by email or through the Eversend app or website.

Any changes we make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by email, through the Eversend app or website or otherwise. Please check back frequently to see any updates or changes to our privacy notice.

16. Cookies

We use cookies to analyse how you use our website. Please read our Cookies policy for more information about cookies.

We also use pixels or web beacons in the direct marketing email that we send to you. These pixels track whether our email was delivered and opened, and whether links within the email were clicked. They also allow us to collect information such as your IP address, browser, email client type and other similar details. We use this information to measure the performance of our email campaigns and for analytics.