

1. Introduction

This Privacy Policy ("Policy") applies to NovaRemit's website at novaremit.com, the NovaRemit mobile application ("App") operated by GlobePay Limited ("we", "our", or "us"). We are committed to protecting and respecting your privacy and handling your personal data in compliance with applicable data protection laws such as the UK General Data Protection Regulation (UK GDPR).

This Policy, together with our User Agreement and Transaction Terms, governs your use of the Services and explains the types of personal data we collect, how we use and protect it, and your rights in relation to that data.

2. Data Controller

Any personal data provided to or gathered by our Services is controlled by GlobePay Limited (company no.: 11399473), registered at: 23 Franklin Building, 10 Westferry Road, London, England, E14 8LS.

3. What Personal Information Do We Collect?

The personal data that we collect from you depends on how you interact with us and our products and services. When we say "personal data" or "personal information" we mean any information related to an identified or identifiable natural person. The following are the categories and specific types of personal data or information we may collect:

Basic Identifying Information: Including your full name (including aliases), residential address, e-mail address, phone number, date of birth, gender, nationality, or other similar identifiers (including a customer ID auto generated by us to identify you in our systems).

Customer Support Information: Information you give to us when you contact customer services or our offices including call recordings (such as when we record customer service calls for quality assurance).

Government Issued Identification or Records: Including your state or country government issued identification card (such as a passport, driver's license, or national identification cards), as well as a picture or recording of yourself with your identification documentation, records of proof of address (e.g., utility bill, loan or mortgage statement).

Marketing & Communications Information: Including your preferences to receive marketing from us and our third parties, communication preferences, and information we lawfully receive from market research, advertising networks, or analytics providers.

Payment Information: Including your financial or payment instrument details or bank account details.

Promotions & Competitions Information: Including your name and email address and certain other personal information that you may be asked to provide to participate in promotions or competitions.

Bill Recipient Information: Including the full name, bank account details (e.g., account name, account number, sort code), payment reference, and address of the bill recipient, where applicable. This information is provided by you in order to execute a payment to a utility provider or other bill issuer. If there is a dispute regarding the payment, we may request additional documentation from you to verify the payment reference and ensure the funds were directed correctly.

Sensitive Personal Data: Including biometric data, mainly face scan information from photos and videos you provide for identity verification purposes and monitoring login activity and your interactions with our site to protect your account and identify suspicious or fraudulent activity. While we do not process your biometric data, our identity verification service provider processes it on our behalf.

Survey & Feedback Information: Including information such as your name, email address or other contact information, responses to surveys, reviews, feedback, testimonials and certain other personal information that you may be asked to provide.

Technical Information: Including the hardware and software you use to access our Services, network information, internet service provider, operating system, the type of browser you use, unique device identifier, IP address, other similar unique identifiers, your current location (using GPS technology, which some of our location enabled Services require your personal data for this to work).

Transaction Information: Including your transaction history (including a unique Transaction reference number), transaction receipts, purpose of transfers, relationship with the recipient, your average transaction amount, how often you use our Services, and other information we collect in order to comply with anti-money laundering and know your customer obligations.

Usage Information: Including information on your interactions with our Services or Sites or browsing or search activity.)

4. How Do We Collect Your Personal Data?

We collect personal data about you from various sources. For example, we collect and obtain information:

Directly from you

We collect personal data you provide, such as when you use our Service, create an Account or Profile, contact us (including via chat), respond to a survey, interact with us at events, participate in a sweepstakes, contest, or other similar campaign or promotion, respond to a survey, post a review, or sign up to receive emails, text messages, and/or postal mailings.

Using cookies and other automatic data collection technologies

When you visit our websites, use our app, open or click on emails we send you, or interact with our advertisements, we or third parties we work with automatically collect certain information using technologies such as cookies, web beacons, clear GIF, pixels, internet tags, web server logs, and other data collection tools. For more information, please see our Cookie Policy.

From Other Sources

We may obtain information about you from other sources, such as data analytics providers, marketing or advertising service providers, social media platforms or networks, fraud prevention or identity verification service providers, electronic databases, credit reporting agencies, vendors that provide services on our behalf, or publicly available sources.

5. How Do We Use or Process Your Personal Data?

We will only use your personal data when the law allows us to. We rely on the following legal bases to process your personal data:

COMPLY WITH LEGAL OBLIGATIONS

We use your personal data to comply with our legal or regulatory obligations, to establish or exercise our rights, and to defend against a legal claim.

Security and fraud prevention

We use your personal data to detect, investigate, prevent, or take action regarding possible malicious, deceptive, fraudulent, or illegal activity, including fraudulent transactions, attempts to manipulate or violate our policies, procedures, and terms and conditions, security incidents, and harm to the rights, property, or safety of NovaRemit and our users, customers, employees, or others.

Comply with applicable laws

We use your personal data to comply with applicable laws and regulations, such as those relating to "know-your-customer," anti-money laundering requirements, sanctions legislation, and the various associated regulatory rules and guidance in relation to risk

investigation, risk scoring, fraud, counter terrorist financing, consumer protection and complaint handling.

TO PERFORM A CONTRACT

To Provide Our Services

We use your personal data when you access or use our Services, including to process your Transaction(s), maintain and manage your account, deliver/fulfill promotional offers or rewards, and process payments.

Communicating With You

We use your personal data to communicate with you, such as to respond to and/or follow-up on your requests, inquiries, issues or feedback, and to provide customer service.

CONSENT OR LEGITIMATE INTEREST

Marketing and Promotional Purposes

We use your personal data for marketing and promotional purposes, such as to send marketing, advertising, and promotional communications by email, text message or postal mail; to show you advertisements for products and/or services tailored to your interests on social media and other websites; and to administer our new customer promotions, sweepstakes, contests, and other similar promotions.

Analytics and Personalisation

We use your personal data to conduct research and analytics, including to improve our services and product offerings; to understand how you interact with our websites, mobile apps, advertisements, and communications with you; to improve our websites, app, and marketing campaigns (business and marketing analytics); to personalise your experience, to save you time when you visit our websites and app, and to customise the marketing and advertising that we show you; to understand how you use our app and website.

Other Business or Commercial Purposes

At your direction or with your consent, we may process certain personal data to fulfill any other business or commercial purposes.

For additional information on our legal bases for processing your personal data, please see the section below entitled, "What is our Legal Basis for Processing your Personal Data?".

6. Who Do We Share Your Personal Data With?

In addition to the specific situations discussed elsewhere in this privacy policy, we disclose

personal data in the following circumstances:

Service Providers

We share certain personal data with third parties that perform services to support our core business functions and internal operations. This includes banks, disbursement providers, or other financial institutions completing your transaction or other financial service request (including payment processors), identity verification or KYC service providers, third parties that provide software and tools to send postal mail, e-mails and text messages, or analyse customer data, provide marketing assistance, administer our reviews, investigate fraudulent activity, conduct customer surveys, and outsourced customer service providers.

Third Party Partners

We may share your personal data with third parties that we have partnered with to jointly create and offer a product, service, or joint promotion. We may also share your personal data with our banking or distribution partners in the event we suspect you are violating our terms or engaging in fraudulent behaviour as it relates to our business. Their use of your information is not governed by this privacy policy, but by their own respective privacy policies.

Social Media Platforms and Networks

Some of our websites have features such as, plugins, widgets, or other tools made available by third parties that may result in information being collected or shared between us and the third party. Their use of your information is not governed by this privacy policy, but by their own respective privacy policies.

Business Transactions

If we become involved with a merger, corporate transaction or another situation involving the transfer of some or all of our business assets, we may share your information with business entities or people involved in the negotiation or transfer.

Legal Process

We may disclose personal data in response to subpoenas, warrants, court orders, government inquiries or investigations, or to comply with relevant laws and regulations. We may also disclose information to establish, exercise, or protect our rights or the rights of others; to defend against a legal claim; to protect the safety and security of our visitors; to detect and protect against fraud; and to take action regarding possible illegal activities or violations of our policies.

Other Instances

We may ask if you would like us to share your information with other third parties who are not described elsewhere in this Policy.

7. Why Do We Process Sensitive Personal Data?

We may ask that you provide biometric data to one of our identity verification providers. Where data protection laws only permit the processing of biometric data with your consent, we will seek your consent prior to the processing.

8. Do We Make Automated Decisions about You?

We use automated processes to check that your access to our Services and your use of our Services meet our required standard, including verifying your identity, and to help prevent fraud or other illegal activities. These processes may make an automated decision to reject your proposed transaction, to block a suspicious attempt to log into your account, or to close your account. If you feel that an automated process may have impacted you, please contact our Privacy team at help@novaremit.com.

9. What Are My Privacy Rights?

Our customers in certain regions of the world have specific data privacy rights based upon the applicable privacy laws and regulations. We strive to implement the best privacy practices as a standard for all our customers.

Access Your Data & Data Portability

You may request that we provide you a copy of your personal data processed by us. This information will be provided without undue delay subject to certain exceptions or limitations, including if such provision adversely affects the rights and freedoms of others.

Correct Your Data/Data Rectification

You have the right to request that we update and correct inaccuracies in your personal data. You can update certain information related to your account by logging into your account on our site or app, as applicable or otherwise contacting us as described in the Exercising Your Privacy Rights section below.

Data Deletion/Erasure

You may request to erase your personal data, subject to applicable law. If you close your account, we will mark your account in our database as "Closed," but will keep certain account information for a period of time. This is necessary to deter fraud, by ensuring that persons who try to commit fraud will not be able to avoid detection simply by closing their

account and opening a new account, and to comply with our legal obligations. However, if you close your account, your personal data will not be used by us for any further purposes, nor shared with third parties, except as necessary to prevent fraud and assist law enforcement, as required by law, or in accordance with this Policy.

Object to the Processing of Data

You have the right to object to us processing or transferring your personal data under certain circumstances. You may object to any processing based on the legitimate interests' ground when there is something about your particular situation where you feel processing on this ground impacts your fundamental rights and freedoms.

Unsubscribe from Direct Marketing

You have the right to ask us not to process your personal information for marketing purposes. You can exercise this right at any time by carrying out 'unsubscribe' actions which are made available to you (such as clicking on the 'unsubscribe' link in each promotional email we send you). We will honour your choice and refrain from sending you such communications. Please note that if you ask us not to contact you by email at a certain email address, we will retain a copy of that email address on a "suppression list" in order to comply with your no-contact request. You are free to change your marketing choices at any time.

You may also control how we use some of your personal data as part of our Services (such as how we may communicate with you) by confirming your preferences in your Account. Please note that not all communications can be switched off -- for example, we may be required to send you email notices about our Services to comply with our legal obligations under national laws and regulatory guidance.

Automated Individual Decision-Making, Including Profiling

In some jurisdictions, you have the right not to be subject to a decision based solely on automated processing of your personal data, including profiling, which produces legal or similarly significant effects on you, unless there are applicable exceptions under relevant data protection laws. We may reject your request, as permitted by applicable law, including when providing the information would result in a disclosure of a trade secret or would interfere with the prevention or detection of fraud or other crime. However, generally in these circumstances we will verify that the algorithm and source data are functioning as anticipated without error or bias or if required by law to adjust the processing.

Withdraw Your Consent

You have the right to withdraw your consent for us to process data, where our lawful basis for processing is based on that consent. Note that withdrawal of consent does not affect the

lawfulness of processing which may have taken place prior to withdrawal of consent. If you withdraw your consent, we may not be able to provide certain products or services to you.

Exercising Your Privacy Rights

To exercise any of the above privacy rights, please submit a request through one of the following methods:

- Sending us an email at help@novaremit.com using the email associated with your NovaRemit account; or
- Contacting us via Chat or Phone.

We typically do not charge a fee for exercising your privacy rights, but where permitted by law, we may charge a reasonable fee for requests that are excessive or manifestly unfounded.

Identity Verification

For us to process some requests, we will need to verify your identity to confirm that the request came from you. We may contact you by phone or e-mail to verify your request. If we are unable to contact you or you fail to respond to our requests to identify you, we may be unable to fulfill your request.

10. How Do We Protect Your Data?

We employ industry accepted technical and organisational measures to protect the information you submit to us. We protect your sensitive personal data using encryption in transit and encryption at rest. We leverage access controls to limit access to personal data to those with a need to know. We also require the use of security credentials (which may, for example, include a username and password) from each user who wants to access their information on our Site and/or our App.

Where we have given you (or you have chosen) security credentials (such as a password) that enable you to access certain parts of our Service, you are responsible for keeping these details confidential and secure. Moreover, if you allow access to our Services via using your fingerprint on your Device (for example, via Apple Touch ID), then you should not allow any other person to register their fingerprint on that Device as it may allow them access to our Services and you could be held responsible for their actions. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security and any transmission of personal information is at your own risk. If you have any questions about security, you can contact us at help@novaremit.com.

11. Transferring Personal Data Internationally

We primarily store and process personal data in the United Kingdom. In certain cases, your data may be transferred to or accessed by our third-party service providers or partners located outside the United Kingdom or the European Economic Area (EEA). Where such transfers occur, we will ensure that your data is protected with an adequate level of security and safeguarded through mechanisms such as adequacy decisions, Standard Contractual Clauses, or other lawful arrangements under UK GDPR.

12. How Long Do We Retain Your Data?

We will retain your personal data only for as long as necessary to fulfill the purposes for which we collected it, including to satisfy legal, regulatory, accounting, or reporting requirements. To determine the appropriate retention period, we consider factors such as:

- Legal obligations or retention periods imposed on us by applicable UK laws and regulations (e.g., FCA requirements);
- The amount, nature, and sensitivity of the personal data;
- The risk of harm from unauthorised use or disclosure;
- Whether we can achieve those purposes through other means.

As a regulated financial institution in the United Kingdom, we are required to retain certain personal and transactional information for at least five years after the end of your relationship with us. This includes data related to your transactions, identity verification, and records necessary to prevent fraud or resolve disputes.

13. Changes to This Policy

We may amend this Policy at any time, and whenever we do so we will notify you by posting a revised version on our Site and App. Please review this Policy each time you make a Transaction as it may have been updated since you initially registered for our Services, or since your last Transaction.

If you do not agree with any aspect of this Policy, or any change, you can end your Agreement with us and close your account by emailing us at help@novaremit.com or otherwise contacting us.

14. Links To Third Party Websites and Services

Our Site and App includes links to other websites whose privacy practices may differ from those of NovaRemit.

If you submit personal information to any of those websites, your information is governed by their privacy policies and we do not accept any responsibility or liability for these policies or for any personal information which may be collected and processed via those websites or services (such as contact and location data). We encourage you to carefully read the privacy policy of any website or software application you use or visit.

This Policy does not cover the practices of third parties that you may engage with when using our Services, such as your mobile network operator or other users of our Services. You should contact the applicable third party about their privacy policy before providing them with any personal information.

15. Children's Data

We ask that persons under the age of 18 (which we treat as children and minors) refrain from using our Services or submitting any personal information to us. Persons under the age of 18 years are not eligible to use our Services and if we discover that someone under the age of 18 has registered an Account or Profile with us, we will close it. We do not knowingly collect data from children.

16. Contact and Complaints

If you have any questions, comments, or requests regarding our privacy policy, you may reach out to help@novaremit.com or our Data Protection Officer at compliance@novaremit.com.

If you feel that we have not addressed your questions or concerns adequately, or you believe that your data protection or privacy rights have been infringed, you can complain to any supervisory authority or other public body with responsibility for enforcing privacy laws.