

HomeSend– Privacy Notice

HomeSend SCRL, Rue des colonies 56, 1000 Brussels, Belgium ("**HomeSend**") provides a mobile-enabled person-to-person digital money transfer solution in emerging markets (the "**Service**"). The Service enables consumers to send money to and from mobile money accounts, payment cards, bank accounts or cash outlets – regardless of their location or that of the recipient.

The transactions processed by HomeSend are initiated when the consumer wishing to send money (the "**Payer**") instructs a HomeSend customer (such as a bank, financial institution, (e-)payment service provider or mobile network operator ("**Customer**")) to transfer an amount of money to a recipient (the "**Payee**") via another Customer (Payer and Payee are hereafter together referred to as "**End-Users**"). When HomeSend processes a transaction, it may call upon service providers ("**Processors**") to carry out specific tasks, such as ensuring that the transactions comply with the applicable regulations.

While HomeSend does not have any direct relationship with the End-Users (only HomeSend's Customers do), HomeSend respects the privacy of the End-Users. This Privacy Notice describes the types of personal information we collect, how we use the information, with whom we share it, and the choices End-Users can make about our use of the information. We also describe the measures we take to protect the security of the information and how End-Users can contact us about our privacy practices.

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Personal Information We Collect

HomeSend may obtain information about End-Users from various sources.

As a processor of financial transactions, we obtain most of the personal information about End-Users from our Customers who want to enable their end-customers to receive money from senders located in other countries.

We also may obtain information about End-Users from our website.

The types of personal information we may obtain include:

- Amount of transactions
- Purpose of transactions
- Sending and receiving country
- Uniform resource identifier (URI) for both the source and the destination of the transaction (i.e. mobile number, e-wallet identifier, bank account or other unique identifier)
- Contact information of the End-Users (such as name, date and place of birth, occupation, nationality, country, postal or e-mail address, and (mobile) phone numbers)
- Proof of identify of End-Users (type of identity document, number, date and place of birth, expiry date and authority responsible for issuing the document)

We collect certain information by using automated means, such as cookies and web beacons, when individuals visit our website. The information we collect in this manner may include: IP address, browser type, operating system, referring URLs and information on actions taken or interaction with our website. A cookie is a small piece of data that a website asks your browser to store on your computer or mobile device. The cookie allows the website to "remember" your actions or preferences over time. Most browsers support cookies, but users can set their browsers to decline them and can delete them whenever they like.

We may use third-party web analytics services on our websites, such as those of Adobe Omniture. The analytics providers that administer these services use technologies such as cookies and web beacons to help us analyze how visitors use our website.

How We Use Personal Information We Collect

HomeSend mostly processes personal information about End-Users on behalf and upon instruction of its Customers, which provide such data to HomeSend to perform transactions requested by End-Users. In such case, HomeSend acts as a so-called “**data processor**” under the EU data protection rules applicable to it. HomeSend however also processes personal information for its own purposes in certain circumstances, thereby acting as a so-called “**data controller**” under the above rules.

Where we act as a data processor, we may use the personal information we obtain about End-Users from our Customers to:

- process End-Users’ financial transactions and enable the transfer of the funds from the Payer to the Payee (including the transmission of the fund transfer instructions, the performance of currency conversion - where required -, the management of the settlement process and the delivery of the transferred amounts)
- handle incorrectly executed or unauthorized payment transactions and handle delays, refusals, changes and cancellations of transactions; and
- allocate the applicable service charges, other fees and costs.

As data controller, we may also use the personal information we obtain about End-Users from our Customers to:

- operate, evaluate, develop and improve our business (including developing new products and services; manage our communications); determine the effectiveness of and optimizing our advertising; analyzing our products, Services, websites;
- perform accounting, bookkeeping auditing, billing, reconciliation activities as well as claims management;
- anonymize personal information, and prepare and furnish aggregated data reports showing anonymized information, (including, but not limited to, the following: compilations, analyses, analytical and predictive models and rules, and other aggregated reports) for the purpose of advising our Customers and partners regarding past and potential future patterns of money transfer, fraud and other insights that may be extracted from this data
- enforce our [Terms & Conditions](#) or other legal rights, where necessary
- as may be required by applicable laws and regulations, including anti-money laundering, terrorist financing and sanction list screening obligations and government disclosure obligations, or requested by any judicial process or governmental agency having or claiming jurisdiction over HomeSend or HomeSend’s affiliates; and
- comply with industry standards and our policies.

We also may use the information in other ways for which we provide specific notice at the time of collection.

Personal Information We Share

We do not sell or otherwise disclose personal information we collect about End-Users, except as described in this Privacy Notice or as we disclose to End-Users at the time the data are collected.

We may share personal information we collect with our affiliates, financial institutions and other entities that process financial transactions. We share personal information to process financial transactions and perform other activities that End-Users request. We also may share personal information with entities that assist with fraud prevention, to protect financial transactions against fraud, and to ensure the security of the transaction processing system. For example, in this context we provide Customers with information about their end-customers' transactions that HomeSend processes.

In addition, we may share personal information with other third parties with the End-Users' consent. When HomeSend acts as a service provider for third parties we may provide them with personal information we collected on their behalf.

We also may share the information with our service providers who perform services on our behalf. We authorize these service providers to use or disclose the information only as necessary to perform services on our behalf or comply with legal requirements. We require these service providers by contract to safeguard the privacy and security of personal information they process on our behalf.

HomeSend transfers personal information within its group of affiliated companies, subject to the terms of this Privacy Notice or otherwise as we disclose to End-Users at the time the data is collected.

On our websites, users may choose to use certain features that can be accessed through, or for which we partner with, other entities that are not otherwise affiliated with HomeSend. These features, which include social networking and geo-location tools, are operated by third parties, including social networks, and are clearly identified as such. These third parties may use or share personal information in accordance with their own privacy policies. We strongly suggest users review the third parties' privacy policies if they use the relevant features.

We may disclose information about End-Users (i) if we are required to do so by law or legal process, (ii) when we believe disclosure is necessary to prevent harm or financial loss, or (iii) in connection with an investigation of suspected or actual fraudulent or illegal activity.

We reserve the right to transfer personal information we have about End-Users in the event we sell or transfer all or a portion of our business or assets. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use personal information End-Users have provided to us in a manner that is consistent with our Privacy Notice. Following such a sale or transfer, End-Users may contact the entity to which we transferred End-Users' personal information with any inquiries concerning the processing of that information.

Your Rights And Choices as an End-User

You have certain rights regarding the personal information we maintain about you. We also offer you certain choices about what personal information we collect from you, how we use that information, and how we communicate with you.

You can choose not to provide personal information to HomeSend by refraining from conducting money transfer transactions using our Services. However, if you do not provide personal information when requested, you may not be able to benefit from HomeSend's Services.

You can opt out of the collection and use of certain information, which we collect about you by automated means, when you visit our websites. In certain jurisdictions, you can exercise your choice via the cookie consent tool displayed in the bottom right corner of HomeSend's website. Your browser may tell you how to be notified and opt out of receiving certain types of cookies. In addition, we may provide you with other choices regarding the use of cookies. Please note, however, that without cookies you may not be able to use all of the features of our websites or online Services.

To the extent provided by applicable law, you may withdraw any consent you previously provided to us, or object at any time on legitimate grounds, to the processing of your personal information. We will apply your preferences going forward. In some circumstances, withdrawing your consent to HomeSend's use or disclosure of your personal information will mean that you cannot take advantage of HomeSend's Services. Subject to applicable law, you may have the right to: obtain confirmation that we hold personal information about you, request access to and receive information about the personal information we maintain about you, receive copies of the personal information we maintain about you, update and correct inaccuracies in your personal information, object to the processing of your personal information, and have the information blocked, anonymized or deleted, as appropriate. The right to access personal information may be limited in some circumstances by local law requirements. To exercise these rights, please contact us as set forth below.

To update your preferences, ask us to remove your information from our mailing lists or submit a request to access, update, correct or delete your personal information, please contact us by using the contact details provided in the "How To Contact Us" section below.

If we fall short of your expectations in processing your personal information or you wish to make a complaint about our privacy practices, please tell us because it gives us an opportunity to fix the problem. You may also contact us by using the contact details provided in the “How To Contact Us” section below for this purpose. To assist us in responding to your request, please give full details of the issue. We attempt to review and respond to all complaints within a reasonable time and, in any event, within the legal time limit for responding, where applicable.

If you provide us with any information or material relating to another individual, you should make sure that the sharing with us and our further use as described to you from time to time is in line with applicable laws, so for example you should duly inform that individual on the processing of her/his personal information and obtain her/his consent, as may be necessary under applicable laws.

International Data Transfers

We may transfer personal information to countries other than the country in which the data was originally collected. These countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your personal information to other countries, we will protect that information as described in this Privacy Notice.

HomeSend’s affiliates form part of a global business. To offer the HomeSend Services, we may need to transfer your personal information among several countries, including the United States, where HomeSend’s majority shareholder is headquartered. We comply with applicable legal requirements providing adequate safeguards for the transfer of personal information to countries outside of the European Economic Area or Switzerland.

How We Hold And Protect Personal Information

The security of End-Users’ personal information is important to HomeSend. We are committed to protecting the information we collect. We maintain administrative, technical and physical safeguards designed to protect the personal information End-Users provide or we collect against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. We use SSL encryption on our website.

HomeSend stores personal information only for as long as it is necessary for the fulfillment of the purpose for which the personal information was collected, unless otherwise required or authorized by applicable law. We take measures to destroy or permanently de-identify personal information if required by law or if the personal information is no longer required for the purpose for which we collected it.

Links To Other Websites

Our websites may provide links to other websites for users’ convenience and information. These websites may operate independently from HomeSend. Linked websites may have their own privacy notices or policies, which we strongly suggest users review if they visit



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any linked websites. To the extent any linked websites users visit are not owned or controlled by HomeSend, we are not responsible for the websites' content, any use of the websites, or the privacy practices of the websites.

Updates To Our Privacy Notice

This Privacy Notice may be updated periodically and without prior notice to End-Users to reflect changes in our personal information practices. We will post a prominent notice on relevant websites to notify End-Users of any significant changes to our Privacy Notice and indicate at the top of the Privacy Notice when it was most recently updated. If we update our Privacy Notice, in certain circumstances, we may seek End-Users' consent.

How To Contact Us

If you have any questions or comments about this Privacy Notice, HomeSend's privacy practices or if you would like us to update information or preferences you provided to us, please e-mail us at: privacy@homesend.com; or write to us at:

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