



# Privacy Policy

Global

1 October 2020

## PRIVACY POLICY GLOBAL

Thank you for using Airwallex!

We understand that by entrusting us with your personal information, we have a responsibility to protect and maintain your privacy. We take this privacy commitment seriously. We also recognize the importance of transparency with respect to our privacy practices. As part of our dedication to transparency, this Privacy Policy (the “**Policy**”) describes the information we collect from you and how that information is used and shared by us. It also includes details about the choices we offer you in relation to your information. Please review it carefully.

As used in this Policy, “we,” “us” “our” and “Airwallex” refers to the Airwallex group company that acts as the “Data Controller” with respect to your information. The Data Controller responsible for your information under this Policy varies depending on your country of residence. Please refer to [Data Controller](#) section to determine the Airwallex subsidiary responsible for your Personal Data.

### SCOPE OF POLICY

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This policy applies to any user of our Services anywhere in the world and any visitor to our website, mobile app, or other channel (collectively, “**Sites**”). This policy does not apply to third-party websites, products or services even if they are linked or provided in conjunction with our Services or Sites. “**Services**” means any products, services, technologies or functionalities offered by Airwallex. The Services we offer may vary by region.

### Personal Data

By “**Personal Data**” we mean information that directly identifies you, such as your name, address, telephone number, email address, date of birth, payment card information, bank account information and any other data that is associated with your identity.

### How We Collect Personal Data

We may collect information through the following methods:

#### Information you Provide to Us

To use our Services, you must provide certain Personal Data to us, including information required to establish an account profile, identity verification information, financial information and information regarding beneficiaries of payments. This information is necessary for us to perform the contracted services and also to allow us to comply with our legal obligations. If you are not able or willing to provide this information, we may not be able to provide you with all the requested Services. Some information you provide to us is voluntarily provided by you and not mandatory. Examples of such information include your opting to respond to our surveys, provide feedback to us about our products and services, participate in promotions or contests or otherwise communicate with us. This information allows us to provide incentives or additional features to you, evaluate our performance and to create a better user experience for you when using the Airwallex platform. This additional information will be processed based on our reasonable discretion or when applicable, your consent.

## Information Automatically Collected from Your Use of Services

When you use our Services or visit any of our Sites, we automatically collect information about you. Information collected automatically may include usage data, information about the devices you use to access the Services, log data and geolocation information. Our [Cookie Policy](#) provides additional information about the technologies we use to automatically collect such information.

## Information from Third Parties

We also obtain information about you from other external sources, including information obtained from our service providers, credit bureaus, community forums used to post ratings or reviews, Airwallex business partners through which you access our services, or other sources of public records. We may combine information collected from third parties with information we collect from you directly through the Airwallex platform.

Regardless of how the method of collection, the information we obtain from or about you is subject, at all times, to the privacy choices or rights exercised by you.

## Personal Data We Collect

The primary categories of Personal Data we collect are:

<b>Account and Profile Information</b>	Personal identifiers such as your name, residential address, email address, date of birth, social security number, driver's license number, passport number, tax identification number or other similar identifiers.
<b>Demographic Data</b>	We may also collect demographic data about you including your employment history, education, marital status, income and other similar information.
<b>Identity Verification Documents</b>	To comply with federal laws and regulations, we may collect copies of your government-issued identification (including passport, driver's license or national ID card) or other authentication information, all of which may include photographs of you.
<b>Payment Information</b>	In order to collect funds and process payments we may collect financial information such as bank account details (account number, routing number), credit or debit card numbers, credit reports or tax information, such as withholding allowances and filing status.
<b>Beneficiary Information</b>	When you book payments, we may collect information about the parties to the transaction, the designated recipient (including the recipient's bank account information), the source of the funds, the reason for the transaction, the devices and payment methods used to complete transactions.
<b>Business Entity Information</b>	If you are using our services on behalf of a business entity, we may collect information about the business including: the organizational structure of the company, the product and service offerings, website domain name

	used by the business, and information about the beneficial owners of the business. We also may collect entity formation documents or other corporate records.
<b>Background Information</b>	To the extent permitted by applicable law, we may obtain back reports about you from public records. In order to obtain such reports, we may use information or Personal Data you provide to us.
<b>Log Data</b>	When you access our Services, we collect server logs which may include information such as access times and dates, pages viewed and other system activity, including the third-party site you were using before accessing our Services.
<b>Device Information</b>	We may obtain information about the devices you use to access our Services including: the device type, operating systems and versions, the device manufacturer and model, preferred languages, and plugins.
<b>Usage Information</b>	We collect information about how you interact or engage with our Sites and how you use our Services including your user preferences and other settings selected by you. This information may be collected if you visit our Sites and regardless of whether or not you establish an account with us or conduct a transaction. In some cases, we do this by utilizing cookies, pixel tags and similar technologies. Please see further details about cookies and other tracking technologies in our <a href="#">Cookie Policy</a> .
<b>Location Information</b>	When you use certain features of our Services, we may collect information about your precise or approximate location as determined by data such as your IP address or mobile device GPS. Most mobile devices allow you to control or disable the use of geolocation services for applications by changing preferences on your mobile device.
<b>Aggregated/Anonymized Data</b>	We may also collect information about our users that is combined so that it no longer identifies or references an individual user. This de-identified data is used for industry and market analysis, demographic profiling, marketing and advertising, and other business purposes.
<b>Communications Data</b>	Information related to your interactions and communications with us, which may include email messages, chat sessions, text messages, and phone calls that we exchange with you.
<b>Call Recordings</b>	Voice recordings of you captured when you contact us including interactions with our customer service or sales teams.
<b>Other Information</b>	Any other information you may provide us when you update your account information, respond to surveys, post to community forums, participate in contests or promotions or use any other feature of our services.

## HOW WE USE YOUR INFORMATION

We use information we collect from or about you for several purposes, including:

#### **To provide Services**

- To process payments to your suppliers and other recipients;
- To provide customer support;
- To enable you to access and use the Airwallex platform; and
- To evaluate your application to use our Services.

#### **To improve our Services**

- To evaluate your satisfaction with our Services, platform and features.
- To develop new products or enhance existing products and services.
- To monitor and analyze trends, usage and other user activities on our Sites to optimize user experience.

#### **To prevent fraud or misuse**

- For quality control and staff training.
- To verify your identity or authenticate your right to access an account or other information.
- To manage risk, fraud and abuse of our Services and Sites.
- To conduct manual or system monitoring to protect against fraud and other harmful activity.

#### **To communicate with you**

- To respond to your inquiries and support requests;
- To send you technical notices, updates, security alerts and other administrative messages; and
- To provide information related to your transactions including confirmations, receipts and tracking notices.

#### **To market and promote our Services**

- To deliver promotional offers, incentives, and targeted marketing in accordance with your preferences (as permitted by applicable law);
- To provide invitations and information about events or events held by our partners; and
- To facilitate promotional contests or sweepstakes.

### **INFORMATION SHARING AND DISCLOSURE**

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In general, we do not share personal information about you with third parties for third-party marketing or advertising purposes. We do share Personal Data with third parties for other purposes. For example, we share personal information with:

### **Our Service Providers**

We engage a variety of service providers to enable us to provide our services to you. For example, service providers may be used to: facilitate payment processing, support technology or infrastructure, conduct market research, detect fraud, verify identity and perform audits or other functions. We will share your Personal Data with such service providers only to the extent necessary to allow the performance of their intended engagement. All service providers and business partners that receive your Personal Data are contractually bound to protect and use your information only in accordance with this Policy.

### **Our Corporate Affiliates**

To facilitate or support us in providing our services to you, we may share your Personal Data within our worldwide corporate family of companies among entities that are related by common control or ownership.

### **Enterprise Partners**

Our Services may be offered to you in conjunction with or facilitated by other financial institutions or other enterprise (an "Enterprise"). Such Enterprises may have access to your Personal Data but only to the extent required to enable use by you of such products.

### **Regulatory Authorities**

If we believe it is necessary, we may share your information with law enforcement officials, government authorities, or other third parties as required to: (i) enforce our User Agreement or other applicable agreements or policies; (ii) protect our rights, property, privacy, or security, or that of others; or (iii) comply with applicable law, legal process or governmental orders.

### **Social Media Platforms**

Social media networks such as Facebook, Twitter, Pinterest, and Instagram that offer functionalities, plugins, widgets, or tools in connection with our website or mobile application (e.g., to log into an account, or to share content with your friends and followers on social media). If you choose to use these functionalities, plugins, widgets, or tools, certain information may be shared with or collected by those social media companies—for more information about what information is shared or collected, and how it is used, see the applicable social media company's privacy policy.

## Potential Acquirers

If we are the subject or are involved in any corporate merger, acquisition, consolidation, reorganization, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with bankruptcy or similar proceedings), we may share data with third parties during negotiations. In the event your Personal Data becomes subject to a different privacy policy, we will make reasonable efforts to notify you beforehand. We also may need to disclose information to a third party in connection with a commercial transaction where we or any of our affiliates are seeking financing, investment or funding.

## Other Authorized Parties

If you provide your consent, we may share your information including your Personal Data with a third party not defined in this Policy. Such disclosure will only be carried out in the manner described to you at the time you agreed to the sharing. Authorizing a third-party application or website to access your Airwallex account or participating in certain promotional activities constitutes such consent to share your information.

## YOUR RIGHTS AND CHOICES

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You have certain rights and the ability to make choices about how we use and disclose your Personal Data as well as what information we may access or hold about you. The ability and extent to which you may exercise these rights will vary depending on your location. For more information about the privacy rights afforded to you in your country or state of residence, please review the section on [Jurisdiction- Specific Rights](#).

## Managing Your Information

You may review, correct or update information you provided to us at any time by logging into your Airwallex account or by contacting us using the contact details below. We will respond to any such request in a reasonable timeframe. Prior to changing or correcting your information, we may be required to verify your identity. There may be circumstances which preclude us from providing access to some or all of your information, for example where the information contains references to Personal Data about an individual other than you or the information is subject to legal or proprietary protections.

### **Data Access and Portability**

In some jurisdictions, applicable law may entitle you to request certain copies of your personal information held by us. We will provide copies of Personal Data in a commonly used, and machine-readable format.

### **Data Erasure**

You may request that we delete/erase your Personal Data in its entirety. We will accommodate such requests in accordance with applicable law and to the extent we are permitted to do so. Please be aware that in some cases, we may retain your Personal Data in order to comply with our legal obligations. For example, we may keep some of your information to comply with anti-money laundering laws, for legal and tax reporting purposes and for our auditing obligations.

### **Device Permissions**

Most mobile devices allow you to disable the use of location services, or revoke consent to applications to access your camera and photo library or send you push notifications information. Please refer your device settings to restrict collection of certain information.

### **Marketing Opt-Out**

You can opt out of receiving promotional communications from us by following the instructions included in those messages or by logging into your Airwallex account and changing your preferences. Please note that if you opt out of marketing-related emails from us, we will continue to send you non-promotional messages that are required to provide our Services, such as transactional receipts and messages about your account or our relationship with you.

## **INFORMATION RETENTION**

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We will retain your Personal Data only for the period of time required to comply with applicable law or fulfill any ongoing obligations to you. Please note that there are certain circumstances in which we will retain your Personal Data even after you close your Airwallex account or request deletion of your Personal Data. Examples of such cases include:

- To process any transactions booked prior to closure or deactivation of an account.
- To comply with anti-money laundering regulations or other laws and rules that apply to us as a financial services provider.
- To detect or prevent fraud.
- To comply with legal process orders or law enforcement requests.
- To collect any fees or other outstanding amount owed and payable to us by you.
- To resolve any disputes or enforce our User Agreement or other applicable agreements or policies.



- To take any other action or exercise any other right in accordance with applicable law.

When a relevant retention period has passed, Airwallex will destroy Personal Data or, where applicable, sufficiently anonymize the Personal Data.

## **COOKIES AND TRACKING TECHNOLOGIES**

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We use cookies and similar technologies (i.e. web beacons, pixels, ad tags and device identifiers) to recognize you and to customize your online experience. To learn more about cookies and the other tracking technologies we may utilize, please refer to our [Cookie Policy](#), which includes a comprehensive overview of cookies and provides further details about how we use cookies and how to control our use of cookies.

### **Advertising and Analytics**

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We may partner with third parties, including Google Analytics to display Airwallex advertisements to you across the Internet and to track and report on the performance of those advertisements. These third-party partners use cookies and other technologies to gather information about your activities on our Sites as well as other sites you visit in order to serve you advertising based upon your browsing history and interests. To learn more about behavioral advertising and online tracking, visit the [Network Advertising Initiative](#). This website also provides information about how to opt out of interest-based online advertising delivered by member companies. You can learn more about Google's practices [here](#). For more information about the cookies that may be served through use of our services, please refer to our [Cookie Policy](#).

## **INTERNATIONAL TRANSFERS AND STORAGE**

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To support our global operations, we and our service providers may store or process your Personal Data in any country where we or one of our affiliates maintains a physical presence or where we engage third-party service providers. This could result in a transfer of your Personal Data to a country outside of your country of residence, including the United States, the United Kingdom, Australia and Hong Kong. The laws and privacy regulations of such countries may differ from the country of your residence and potentially may not be as protective. There may be circumstances in which the law enforcement agencies or government authorities in such other countries may be entitled to access your Personal Data. Any transfer of your Personal Data outside your country of residence will at all times comply with the standards set forth in this policy as well as the applicable data protection rules.

## **SECURITY**

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We implement and update technical and physical security measures to safeguard your Personal Data against loss, misuse or unauthorized access on an ongoing basis. Safeguards used to protect your information include firewalls, data encryption, and access controls. Please keep in mind that the transmission of information over the Internet is never 100% secure and no data storage system can be guaranteed safe. Although we will do our best to protect your Personal Data, we cannot warrant the security of data transmitted to our Sites; any transmission is at your own risk. We encourage you to understand the integral role you play in keeping your own Personal Data secure and confidential. Please select passwords that are sufficiently complex and always keep our log-in details secure. If you suspect any unauthorized use or access to your account or information, please contact us immediately.

## CHILDREN'S PRIVACY

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Our Sites and Services are not intended for or directed at children under the age of 16. We do not knowingly collect any information from children. If we obtain actual knowledge that we have collected Personal Data from an individual under the age of 16, we will immediately delete it (unless we are legally obligated to retain such information). Please contact us if you believe that we inadvertently collected information from any individual under the age of 16.

## THIRD PARTY LINKS AND SERVICES

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Our Sites may include links to third party websites or services, such as third-party integrations, co-branded services, or third-party branded services ("Third-Party Sites"). Clicking on those links or enabling those connections may allow third parties to collect or share information about you. We do not own or control these third-party websites and when you engage with these Third-Party Sites, you may be providing information directly to the Third-Party Site, Airwallex, or both. Third-Party Sites will have their own policies about the collection, use and disclosure of your information. Please review those policies for more information.

## UPDATES TO THIS POLICY

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We reserve the right to make changes to this policy at any time by posting a revised version to our Site and updating the "Last Updated" date at the top of this policy. If we make material changes, we will provide reasonable notice to you, including by email to the email address associated with your Airwallex account. To the extent permitted by applicable law, your continued use of our services after such notice or posting constitutes your consent to our revisions of this Policy. If you disagree with any of our changes, you may deactivate your account with us at any time.

## DATA CONTROLLER

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Your Data Controller that is responsible for your information is as follows:

Country of Residence	Data Controller
Australia	Airwallex Pty Limited
United States	Airwallex US, LLC
Hong Kong	Airwallex (Hong Kong) Limited
United Kingdom, EEA or Switzerland	Airwallex (UK) Limited
Japan	Airwallex Japan KK
India	Airwallex Services India Private Ltd.
All other countries	Airwallex (Hong Kong) Limited

## JURISDICTION-SPECIFIC RIGHTS

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### **For residents of European Economic Area (EEA), UK and Switzerland:**

Under the General Data Protection Regulation (GDPR), residents of the EU may exercise certain rights regarding their personal data. If you would like to make a data subject access request, please contact [dataprotection@airwallex.com](mailto:dataprotection@airwallex.com).

If you are a resident of the EEA and believe, you may direct your questions or complaints to [the Office of the Data Protection Commissioner](#). If you are a resident of the UK, you may direct your questions or concerns to the [UK Information Commissioner's Office](#).

### **For residents of California -United States**

If you are a California resident, you have certain rights afforded by the California Consumer Protection Act (CCPA) with respect to your personal information.

#### **Right to Know**

You have the right to request access to the information we have collected from you or about you in the prior 12-month period including:

- the categories and specific pieces of personal information we have collected about you;
- the categories of sources from which we collected the personal information;
- the business or commercial purpose for which we collected the personal information;
- the categories of third parties with whom we shared the personal information; and
- the categories of personal information about you that we disclosed for a business purpose, and the categories of third parties to whom we disclosed that information for a business purpose.

Information requested pursuant to this right will be provided to you in a portable and usable format. You may exercise your access rights up to two times during any 12-month period.

#### **Right to Delete**

You also have the right to submit a request for deletion of the information we have collected from you. Your right to delete your information is subject to certain limitations. For example, we may deny your deletion request if retaining the information is necessary for us to complete the transaction for which we collected the personal information or comply with legal obligations.

#### **Right to Opt Out**

You have the right to direct us to not "sell" your personal information at any time (the "right to opt-out"). We do not sell the personal information of consumers. As set forth in this Policy, Airwallex does not sell or rent your Personal Data.

Consistent with California law, if you choose to exercise your CCPA rights, we won't charge you different prices or provide different quality of services or otherwise discriminate against you for exercising your CCPA rights. However, please note we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels.

To exercise any of the rights described in this section, please submit your request by contacting us at [privacy@airwallex.com](mailto:privacy@airwallex.com). Your request must provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

### **For residents of Australia**

If you are an Australian resident, and you feel that we have not handled a complaint you raised under this Privacy Policy adequately, you may contact the [Office of the Australian Information Commissioner](#).

**For residents of Hong Kong**

Please see our [Hong Kong Privacy Policy](#) for specific information about our privacy practices in Hong Kong and your rights in relation to your Personal Data.

**For residents of Singapore**

Please see our [Singapore Privacy Policy](#) for specific information about our privacy practices in Singapore and your rights in relation to your Personal Data.

**CONTACT US**

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If you have questions or concerns about this policy, or a specific request related to your Personal Data, please contact us at [privacy@Airwallex.com](mailto:privacy@Airwallex.com).