

Privacy Statement

Data Controller	Western Union International Bank GmbH Schubertring 11, A-1010 Vienna, Austria
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Effective Date: May 2018

Western Union, our subsidiaries and affiliates ("Western Union" or "we" or "us") care about your privacy and are committed to processing your personal information in accordance with fair information practices and applicable data protection laws.

SCOPE OF THIS PRIVACY STATEMENT

This Privacy Statement describes how Western Union collects, uses, protects and shares your personal information when you use our services in the European Economic Area (EEA), as well as your choices about the way your information is collected and used. Personal information means all information relating to an identified or identifiable individual.

INFORMATION WE COLLECT AND HOW WE COLLECT IT

When you use our digital or retail services, contact us, or join our loyalty programs (collectively, the "services"), we collect personal information about you and may use it along with other information collected or generated during our relationship with you. We collect different types of personal information relating to you, which may include:

- Contact information, for example your name, postal address, e-mail address, telephone number date of birth and national identification numbers;
- Transaction information, including your money transfers and bill payments;
- Business related information that helps us provide our services to you, such as membership in our loyalty programs, use of our services, and marketing choices;
- Compliance information, including fraud prevention, identity verification, and sanction checks.

To conduct a money transfer, or use other payment services, you must provide certain information required by Western Union to execute the transfer and to enable us to comply with our legal obligations associated with transferring money. Failure to provide some of your personal information may affect our ability to provide our services to you. This may include information about the form of identification used to send or receive a transaction (where required by law) including the identification or a copy of the identification document, transaction activity, bank account and payment information.

When you use our mobile applications, digital or online services, we also collect personal information about the domain and host from which you access the Internet, your computer's IP address or device advertising ID, geolocation if enabled, information about your device (such as device properties, settings, applications, storage and usage information), browser and operating system software, social profile and network information, the date and time you access our websites and the address of the site from which you linked to our website when you visit us. We collect personal

information on your online activity as described in the paragraph below titled “**COOKIES AND INTERNET TECHNOLOGY.**”

Western Union collects your personal information in several ways:

- Through transaction forms and your interactions with Western Union agents and partners;
- Through online forms, registrations for loyalty and rewards programs or competitions, and other online services we offer (some of which may be managed by third parties on behalf of Western Union);
- While providing customer support or consultation, using email, post, call centres or live chat;
- Through the process of maintaining and upgrading our services;
- Through automated means such as communications protocols, e-mail communications and cookies;
- Through our mobile applications and mobile websites (some of which may be managed or have functionalities provided by third parties on behalf of Western Union);
- Through your use of social media or other public data sources; and
- Through your interest in Western Union advertisements placed on third party sites.

In addition to the personal information we collect from you, we may also collect your personal information from the person to whom you send and/or receive money, as well as our agents, service providers, business partners, identity verification companies, telecommunications providers, payments and fraud risk management companies, law enforcement bodies, and commercial and public data sources.

If you apply to become a Western Union Agent, we will use the personal information you provide to consider your application and verify your suitability and eligibility to be an agent.

PURPOSES AND LEGAL BASES UPON WHICH WE USE YOUR PERSONAL INFORMATION

Western Union may use your personal information for each of the following purposes and legal bases:

We use your personal information to provide our services to you: This includes using personal information necessary for conducting money transfers, payment services, prepaid cards, or loyalty programmes. We may use this information in the performance of a contract with you or for taking steps to enter into a contract for any of the above or for any other Western Union products or services.

We use your personal information for legitimate business purposes: This includes using personal information to analyze and improve our products, locations, services, operations, the running of this site and your customer experience, and for measuring marketing return on investment and brand satisfaction. This may include using your information to conduct market research surveys. We may also use your personal information to provide customer services and to help protect the security and integrity of our technology, systems, and services.

We use your personal information for legal and compliance purposes: This includes using personal information needed to comply with legal and regulatory duties related to anti-money laundering and counter-terrorist financing; detection, prevention and prosecution of fraud and theft as well as preventing illegitimate or prohibited use of our services or other illegal or wrongful activity. This may also include establishing, exercising, or defending legal rights and claims of Western Union and others, and monitoring and reporting compliance issues. This may further include using your

personal information to validate and authenticate your identity, and utilizing third parties to help us do so.

We may process your personal information based on your consent: This includes consent for receiving marketing communications, or where otherwise required by applicable law. If we request your consent, we will inform you of the intended purposes for which your information will be processed.

We will inform you when your information is required to provide the services you request, or is required by law. In certain cases, such as performing money transfer services, we may be unable to provide you with our services unless you provide certain personal information.

COOKIES & INTERNET TECHNOLOGY

We use internet technologies like cookies and web beacons for a variety of purposes, including, but not limited to those identified below:

- To assist us in providing services to you and help you to receive the best experience using this website;
- To allow you to change webpages during your visit without having to re-enter your password;
- To temporarily track activity on our website;
- To verify your identity when you use our mobile websites or applications, and we may contact your mobile carrier to assist us in verifying your identity;
- To determine whether you came to our site from a banner ad or an Affiliate website;
- To deliver information specific to your interests on additional websites;
- To better understand the effectiveness of our promotional campaigns and whether you acted on our promotional messages;
- To identify you when you visit the website, to personalize the content of the website for you and to assist you in carrying out transactions and accessing account information.

Western Union has implemented the capability for the user to manage cookies on our websites. We will only read or write cookies based on your preference level. (Note: cookies set prior to you changing your preference level are maintained on your computer; to remove them please refer to your browser settings and, if needed, your browser's "Help" function.). If your browser does not support JavaScript, you can find out about the cookies used on our sites and can only manage the use of cookies through your web browser settings. Please note that if you disable all cookies on your browser, this will limit the features of this site and may impact the ability to complete your transaction.

For more information on how Western Union uses cookies click here: <https://partners.westernunion.com/gb/en/postoffice>

EXTERNAL WEBSITES

Western Union's Website may be linked to or from third party websites. Western Union has not reviewed, does not control, and is not responsible for the content or privacy practices employed by websites that are linked to or from our website. Western Union does not assume responsibility for any of these sites, their content, or their privacy policies. Western Union does not endorse third party websites or make any warranties about any information, software or other products or materials you may find there, or any results that may be obtained from using them.

CONFIDENTIALITY AND SECURITY

We endeavor to maintain physical, technical and organizational safeguards that comply with applicable government laws and regulations to protect your personal information against accidental

or unlawful destruction, loss, alteration, unauthorized disclosure or access, and against all other unlawful forms of processing. We also endeavor to restrict information access to our employees, agents and representatives that need to know it. Despite our efforts, third parties may unlawfully intercept or access transmissions sent to us or may wrongly instruct you to disclose personal information to them while posing as Western Union.

DISCLOSURE OF YOUR INFORMATION

If there is a reasonable need to do so for any of the purposes listed above, we may disclose your personal information including, but not limited to, your name, customer ID number, address, transaction patterns and bank account information to the following types of organizations or parties:

- Western Union group companies, including but not limited to Western Union Payment Services Ireland Ltd (Ireland), Western Union International Bank GmbH (Austria), Western Union International Limited (Ireland), Western Union Financial Services, Inc (USA) and Western Union LLC (USA);
- Our agents or business partners who facilitate the money transfer transaction or specific service you have requested;
- Service providers, payments processors, banking partners and data processors contracted to provide business and customer services including marketing, advertising and customer satisfaction research on our behalf;
- Service providers and data processors contracted to help us validate the accuracy of the information provided by you, and to authenticate your identity and manage risks related to security, fraud and identity.
- Third parties that you have authorized to access your account and/or your account information in order to perform services for you, such as account information service providers and payment initiation service providers.

We may transmit personal information we possess in connection with a sale or transfer of all or part of our business. We may also disclose your personal information globally, as required or permitted by applicable laws and regulations, to regulatory and financial authorities, law enforcement bodies, courts, governments or government agencies, to meet compliance and legal obligations or to assert or defend the rights and interests of Western Union or others.

INTERNATIONAL DATA TRANSFERS

We transfer your information to parties in countries outside the EEA, including but not limited to the USA, as required by applicable law, regulatory authorities, law enforcement and government agencies. Additionally, when you send or receive money to or from another country, we will also be required to share some of your personal information with that country as required or permitted by law. We transfer certain personal information about you to our data centres in the USA and process it to fulfil our legal and compliance obligations which apply to the services we provide. We also store certain personal information we collect based on your marketing choices in our US data centre. By using this website, you acknowledge that such transfers of information outside of your country of residence may occur.

Personal information transferred outside the EEA to countries that the European Commission has not found to provide adequate protection will be protected by appropriate contractual clauses or other EU-approved mechanisms, as required by law. You can request to see these mechanisms using the contact details in the Contact Us section.

CHOICE AND OPT-OUT

Subject to your choices and based on the contact information you provide, we may send you commercial communications about our products and loyalty programmes, which may include offers by email, telephone, post, SMS, social media and other communication or digital channels. We conduct analysis of the information we hold to better understand our customers, including profiling and/or analytics to help us customize or personalize our marketing (when you have agreed to marketing) and to tailor our products and services to help us better serve your needs and requirements. You can opt out of receiving marketing communications at any time. Please note that if you choose to withdraw your consent, you may not be able to participate in or benefit from our programs, services and initiatives for which you previously provided consent.

RETENTION OF PERSONAL INFORMATION

Your personal information will be retained in accordance with statutory periods contained in regulations applicable to financial transactions including those in anti-money laundering, anti-terrorist financing and other laws applicable to us. Otherwise, we will retain your information only as long as necessary for the specific purposes it was collected, or to resolve any query you may raise. As a general rule, we will typically keep your information for no longer than 10 years after a given transaction, unless we have a legal obligation to keep it for a longer period.

YOUR PERSONAL INFORMATION RIGHTS AND HOW TO CONTACT US

You have the right to know if we are processing your personal information and to ask us for a copy of your information free of charge. You have the right to request a structured and machine-readable copy of certain information you have provided to us. We may charge you a reasonable fee for providing the information, or not act upon your request, if the request is manifestly unfounded or excessive. You have the right to stop us sending you marketing communications. You have the right to ask us to correct information about you that is incomplete, inaccurate or out-of-date. You have the right to ask us to erase certain information about you, to restrict certain uses of information relating to you, and also to object to certain uses of it. To the extent we are processing personal information based on your consent, you may withdraw your consent as permitted by applicable law. You also have the right to lodge a complaint with a supervisory authority about our processing of personal information. When we receive a request, we may ask for additional information from you to verify your identity. In some situations, we may refuse to act or may impose limitations on your rights, as permitted by applicable law.

To exercise these rights, please contact Western Union by calling 0800 026 5756 or by using the Contact Us section of our website <https://partners.westernunion.com/gb/en/postoffice>. We will endeavour to respond to your request within 30 days, but may be entitled to extend this period in certain circumstances. We will comply with your request to the extent required by applicable law.

If you have a complaint about how Western Union has responded to your request under this section, or a question about how we handle your personal information, we ask that you put your inquiry in writing. We will investigate your inquiry and generally respond to you in writing within 30 days of receipt. You can also contact our Data Protection Officer on wuprivacy@westernunion.com.

CHANGES

Western Union reserves the right to modify this Privacy Statement. Updated privacy statements will be posted on this Website when amendments occur. We urge you to review this Privacy Statement when you visit to obtain the most current statement.