

# WESTERN UNION'S GLOBAL PRIVACY STATEMENT

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The Western Union Company, 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 to better serve you. For a list of local Western Union entities, please see the "WESTERN UNION LEGAL ENTITIES" section of this Global Privacy Statement.

## **SCOPE OF THIS GLOBAL PRIVACY STATEMENT**

At Western Union, we are committed to helping our customers move their money to make good things happen. This commitment to our customers includes doing the right thing with their personal information.

The purpose of our Global Privacy Statement is to explain how we collect, use, store, protect, disclose, and share your personal information when you use any of our services online through our website, in retail, and through our mobile apps, as well as to inform you of your choices about the way your information is collected and used.

## **PERSONAL INFORMATION WESTERN UNION COLLECTS**

When you use our money transfer or other payment services; open and maintain a bank account with us; contact us; access our websites or applications; 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:

- Basic personal information such as your name, contact information (for example, your postal address, email address, telephone number), photo or other image of you (if you choose to provide), place of birth, date of birth, gender, citizenship, occupation, marital status, and government or national identification numbers and accompanying documentation;
- Financial and transactional information such as your money transfers, payments, deposits and the source/destination of funds for each, information about how you use of our Services, bank and credit information, and employer information;
- Name and contact information relating to recipients to whom you send or from whom you request or receive money or with whom you otherwise choose to transact when using the Services;
- Technical information such as the host from which you access the internet, your IP address or device advertising ID, geolocation if enabled, information about your device (such as device properties, settings, applications, storage and usage information), mobile application, 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 activities as described in the section titled “INTERNET TECHNOLOGIES.”;
- Sensitive or special categories of information such as biometric information used to uniquely identify you (for example finger prints or facial recognition) or criminal conviction information. We will only hold this data when we need to for the purposes of the Services we provide to you, where we are processing the data for a substantial public interest, where we have a legal obligation, or where we have your consent to do so;
- If you link, connect, or login to Western Union websites or mobile applications using a third party service (e.g. Google and Facebook), you direct the service to send us information such as your name, email address, profile picture and other information as controlled by that service or as authorized by you via your privacy settings with that service.

## **HOW WESTERN UNION COLLECTS PERSONAL INFORMATION**

Western Union collects your personal information in several ways:

- Information you give to us in person, online or through our mobile app including through transaction forms, registrations for our bank accounts or loyalty programs, interactions with Western Union agents and business partners;
- Information you provide to us while we provide customer support or consultation, including using email, postal mail, call centers, or live chat;
- Information that others may provide about you through the use of our Services;

- Information we learn about you through the use of our Services;
- Through automated means such as communications protocols, email communications, and cookies or similar INTERNET TECHNOLOGIES;
- Through our vendors, fraud risk management companies, law enforcement bodies, commercial and public data sources and other lawful third party data sources we use to augment our customer information;
- Through your use of social media; and
- Through your interest in Western Union advertisements placed on third party sites.

## **HOW WESTERN UNION SECURES YOUR PERSONAL INFORMATION**

We are committed to the security of your personal information. We use organizational, technical, and administrative safeguards that comply with applicable government laws and regulations to secure your personal information. We also endeavor to restrict access to the personal information that we process to only our employees, agents, and representatives that have a business need to know it. Despite our efforts, third parties may unlawfully intercept or access your personal information.

## **INTERNET TECHNOLOGIES**

We use internet technologies like cookies, tags, and web beacons on our websites, in mobile applications, or when you visit a third-party website where we provide online Services for a variety of purposes, including, but not limited to, those identified in the section titled “HOW WESTERN UNION USES THE PERSONAL INFORMATION IT COLLECTS”.

For more information on how we use cookies please click the “Cookie Information” link in the footer of the applicable Western Union webpage. In certain regions we have implemented the capability for the user to manage cookies on our websites; where available, we will only read or write cookies based on your preference level.

We may use third parties to deliver personalized ads to you while you browse the Internet. You can generally opt out of receiving personalized ads from these third party advertisers and ad networks who are members of the [Network Advertising Initiative \(NAI\)](#) or who follow the [Digital Advertising Alliance's \(DAA's\) Self-Regulatory Principles for Online Behavioral Advertising](#) by visiting the opt out pages on the NAI and DAA websites.

Do Not Track (DNT) is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. We do not respond to DNT signals.

## **HOW WESTERN UNION USES THE PERSONAL INFORMATION IT COLLECTS**

We utilize the personal information we collect for the following commercial purposes. Failure to provide some of your personal information may affect our ability to provide our Services to you:

- **Performing the Services:** To assist us in providing Services and customer support to you, to help you to receive a personalized experience, to assist you in carrying out transactions and accessing account information, and to associate your personal information when you use multiple Services (for example, when you create a WU+ account, to link to your loyalty program information or transactions that you made before you created your WU+ account);
- **Communication:** To contact you with information relevant to the Services you use or the loyalty programs you participate in, to answer questions or respond to other requests you send to our customer service teams, or to market to you based on your preferences;
- **Authentication:** To recognize you and to allow you to remain signed-in during your use of the Services without having to re-enter your password;
- **Analytics:** To perform analytics on understanding our customers, improving their experience;

- Web Traffic Analysis: To determine whether you came to a Western Union website from an online ad, partner, or an affiliate; or have clicked an advertisement or link on one of our websites;
- Advertising: To deliver information specific to your interests on non-Western Union websites and applications;
- Analysis of Promotions: To better understand the effectiveness of our promotional campaigns and whether you acted on our promotional messages;
- Prevention of Fraud, Financial Crime (including money laundering), and Other Unlawful Activity: To promote safety, reduce financial risk, and combat fraud across our Services and, as necessary, to ensure the effectiveness of our compliance processes aimed at such prevention of criminal activity.

## **LAWFUL BASES UPON WHICH WE USE YOUR PERSONAL INFORMATION**

We may use your personal information as explained elsewhere in this Statement for each of the following lawful bases:

- We use your personal information to provide our Services to you: This includes using personal information necessary for providing banking services (when you open a WU+ account), conducting money transfers, payment services, prepaid cards, or loyalty programs. 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, where these legitimate business purposes do not outweigh the rights and freedoms of the individuals whose data we process: 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. It may also include the prevention of fraud, money laundering, and other unlawful activity, or the establishment or defense of a legal claim,
- 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, counter-terrorist financing and other financial regulations; 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 and operating a global compliance program for doing so. 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 as outlined in this Statement: This includes consent for receiving marketing communications, for enabling your WU+ profile to be visible to others, 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 and banking services, we may be unable to provide you with our Services unless you provide certain personal information.

## **HOW WESTERN UNION MARKETS TO ITS CUSTOMERS**

Subject to your preferences, we will notify you of offers, promotions, and updates regarding our products and Services. These may include offers by email, telephone, postal mail, SMS, social media, and other communication or digital channels.

You can opt out of receiving marketing communications at any time. If you no longer want to receive marketing-related communications from us, you may opt out by following the instructions in the relevant electronic communication or by contacting us as described in the “CONTACTING US” section.

Please note that if you opt out of receiving marketing-related communications from us, we may still send you important service, administrative, or transaction-related communications.

## **INFORMATION FROM CHILDREN**

We do not direct our Services or products at children under the age of 18. We do not knowingly collect or maintain information from our retail, website, or mobile apps from persons under the age of 18.

## **EXTERNAL WEBSITES**

Our websites may be linked to or from third party websites. We have not reviewed, do not control, and are not responsible for the content or privacy practices employed by websites that are linked to or from our websites. We do not assume responsibility for any of these sites, their content, or their privacy policies. We do 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.

## **WHO WESTERN UNION SHARES YOUR PERSONAL INFORMATION WITH**

For any of the purposes listed in this Statement, we may disclose applicable personal information including, but not limited to, your name, contact information, national identification number and/or related documentation, customer ID number, address, transaction details and patterns, and bank account information to the following types of organizations or parties:

- Western Union group companies and affiliates, including those listed in the section titled “WESTERN UNION LEGAL ENTITIES”;
- Required local remittance licensing entities relevant to a transaction, including those listed in the section titled: “NON-AFFILIATE LOCAL LICENSING ENTITIES”;
- Our agents or business partners who facilitate the money transfer or payment transaction or other specific Services you have requested;
- Vendors, payments processors, banking partners, and data processors contracted to provide business and customer services;
- Services providers, based on your consent where applicable, including those that provide marketing services, advertising services, shopping services related to our loyalty programs, and customer satisfaction and market research services on our behalf. Such sharing may include sharing with third parties (such as social media companies) to facilitate more relevant and targeted advertising;
- Vendors 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. If you are a customer of a Service that allows for a public profile, you may choose to make your profile publicly visible. This may include sharing limited personal details such as name, photo of you, available currencies of your account, and the fact that you are a customer. Also, if you are a WU+ customer, other WU+ customers are also able to search for you with your phone number as well as utilize a QR code you may provide in order to transact with you.

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, credit reporting agencies, 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 TRANSFERS OF PERSONAL INFORMATION**

We transfer your personal information to parties in countries outside the country it was collected, including but not limited to the USA, as permitted or 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 centers located in the USA or within a region as required by local law and process it to fulfil our legal and compliance obligations which apply to our Services. We also store certain personal information we collect based on your marketing choices in our US data center. By using the Services, you acknowledge that such transfers of information outside of your country of residence may occur.

## **TRANSFERS FROM THE EEA, THE UK, AND SWITZERLAND**

Personal information transferred outside the EEA, the UK, and Switzerland to countries that the European Commission has not found to provide adequate protection will be protected by appropriate [Standard Contractual Clauses](#) or other EU-approved mechanisms, as required by law.

## **RETENTION OF PERSONAL INFORMATION**

Your personal information will be retained in accordance with statutory periods contained in regulations applicable to financial transactions and accounts including those in anti-money laundering, anti-terrorist financing and other laws applicable to us. Otherwise, we will retain your information only if necessary for the specific purposes for which it was collected, or to resolve any query you may raise. We subscribe to data minimization principles and strive to retain information for no longer than necessary for the purpose(s) for which it was obtained.

## **ACCESSING, DELETING AND CORRECTING YOUR PERSONAL INFORMATION AND**

### **CHANGING YOUR CHOICES**

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. If you use our Services online or via mobile app, you may log into your account at any time to access your statements, transactional information, and certain personal information.

You have the right to stop us from 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 delete certain information about you, to restrict certain uses of information relating to you, and 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. If you are a registered user of westernunion.com as a digital money transfer consumer, you may also visit westernunion.com and edit your profile settings to change your marketing communications and third-party data sharing preferences. You also have the right to lodge a complaint with a relevant data protection regulator or 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 and as a security measure to protect your personal information. 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 visit [https://wuprod.service-now.com/wu\\_privacy](https://wuprod.service-now.com/wu_privacy) or contact Western Union through the section titled "CONTACTING US". We will



endeavor to respond to your request within 30 days, but response time may vary depending on the laws and regulations applicable to your request, and we may be entitled to extend this period in certain circumstances. We will comply with your request to the extent required by applicable law.

Additional rights may also be available in various jurisdictions under local laws. These will be accessible via the means provided above.

## **CONTACTING US**

If you have a question or complaint 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 us, including our Data Protection Officer, at [wuprivacy@westernunion.com](mailto:wuprivacy@westernunion.com).

To contact us via a toll-free or local phone number, please click the "Contact Us" link in the footer of the applicable Western Union webpage to find contact information specific to your region.

## **CHANGES**

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

## **USA CITIZEN (INCLUDING CALIFORNIA RESIDENTS) PRIVACY NOTICE**

For consumers in the USA (including those in California, Nevada, North Dakota, Texas and Vermont) please follow this link to [Western Union's Privacy Notice](#).

For California residents, please see the California Resident Addendum to this Global Privacy Statement.

## **MEXICAN CITIZEN PRIVACY NOTICE**

For consumers in Mexico, see the Mexican Resident Addendum to this Global Privacy Statement.

## **BRAZILIAN CITIZEN PRIVACY NOTICE**

For consumers in Brazil, see the Brazilian Resident Addendum to this Global Privacy Statement.

## **JAPANESE CITIZEN PRIVACY NOTICE**

For consumers resident in Japan, notwithstanding any other provisions contained in this Global Privacy Statement, we will treat your Japanese Personal Identification Number ("My Number") and its supporting documents in compliance with any applicable laws and regulations as described in this section.

We collect your My Number and supporting documents designated by us solely for the purpose of confirming your My Number as required by and in compliance with the Act on Submission of Statement of Overseas Wire Transfers for Purpose of Securing Proper Domestic Taxation of Japan (Act No. 110 of 1997, as amended).

## **WESTERN UNION LEGAL ENTITIES**

For a list of local Western Union legal entities, please see here: "WESTERN UNION LEGAL ENTITIES."

## **NON-AFFILIATE LOCAL LICENSING ENTITIES**

For a list of local Western Union local licensing entities, please see here: "WESTERN UNION LOCAL LICENSING ENTITIES."



## CALIFORNIA RESIDENT ADDENDUM TO THE WESTERN UNION'S GLOBAL PRIVACY STATEMENT

We care about the privacy of our Californian consumers and are committed to collecting, using, storing, protecting, disclosing and sharing your personal information in accordance with the California Consumer Privacy Act of 2018 ("CCPA"). This California Resident Addendum to the Global Privacy Statement ("**Addendum**") is applicable to residents of California and, in conjunction with the Global Privacy Statement, is intended to address the requirements of the CCPA.

When you use our Services, we collect personal information about you as permitted by applicable laws and regulations (including but not limited to the Graham Leach Bliley Act). The Categories of Personal Information described below are subject to the CCPA. For more information about the personal information that may have been collected about you, please follow [this link to the Global Privacy Statement](#).

### COLLECTION OF PERSONAL INFORMATION

In the 12 months prior to the effective date of the Global Privacy Statement, Western Union may have collected the below Categories of Personal Information from the indicated Categories of Sources; this information may have been shared with the described Categories of Third Parties for the specified Business Purposes. Categories of Sources, Categories of Third Parties, Commercial Purposes and Business Purposes are further defined in the Global Privacy Statement and below.

Categories of Personal Information	Categories of Sources	Business and Commercial Purposes	Categories of Third Parties
<u>Identifiers</u> : contact information provided for example your name, postal address, e-mail address, and telephone number; date of birth provided; social profile and network information; IP address; device identifier; mobile ad identifier; cookies; beacons; and pixel tags.	<ul style="list-style-type: none"><li>• You</li><li>• Our Website</li><li>• Affiliates, Subsidiaries or Vendors</li><li>• Mobile Applications</li></ul>	<ul style="list-style-type: none"><li>• Auditing</li><li>• Security Purposes</li><li>• Performing the Services</li><li>• Quality Purposes</li><li>• Authentication</li><li>• Analytics</li><li>• Web Traffic Analysis</li><li>• Advertising</li><li>• Analysis of Promotions</li><li>• Safety</li></ul>	<ul style="list-style-type: none"><li>• Government entities</li><li>• Professional services organizations</li><li>• Advertising and social networks</li><li>• Data analytics providers</li><li>• Our affiliates and subsidiaries</li></ul>
<u>Internet and Other Electronic Network Activity Information</u> : including the host from which you access the Internet, information about your device (such as device properties, settings, applications, storage and usage information), mobile application, browser and operating system software, 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.	<ul style="list-style-type: none"><li>• Your Use of Our Website</li><li>• Affiliates, Subsidiaries or Vendors</li><li>• Your Use of Mobile Applications</li><li>• Social Media Networks or Publicly Available Sources</li><li>• Advertising Networks</li></ul>	<ul style="list-style-type: none"><li>• Auditing</li><li>• Security Purposes</li><li>• Debugging</li><li>• Short Term Use</li><li>• Performing the Services</li><li>• Internal R&amp;D</li><li>• Quality Purposes</li><li>• Authentication</li><li>• Analytics</li><li>• Web Traffic Analysis</li><li>• Advertising</li><li>• Analysis of Promotions</li><li>• Safety</li></ul>	<ul style="list-style-type: none"><li>• Government entities</li><li>• Professional services organizations</li><li>• Advertising and social networks</li><li>• Internet service providers</li><li>• Data analytics providers</li><li>• Operating systems and platforms</li><li>• Our affiliates and subsidiaries</li></ul>

Geolocation Data: may be collected from your devices only if enabled	<ul style="list-style-type: none"> <li>• Your Use of Mobile Applications</li> </ul>	<ul style="list-style-type: none"> <li>• Auditing</li> <li>• Security Purposes</li> <li>• Short-term use</li> <li>• Internal R&amp;D</li> <li>• Quality Purposes</li> <li>• Safety</li> </ul>	<ul style="list-style-type: none"> <li>• Advertising and social networks</li> <li>• Data analytics providers</li> <li>• Operating systems and platforms</li> </ul>
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**Categories of Sources:** in the 12 months prior to the effective date of the Global Privacy Statement, Western Union may have collected Personal Information about you from the following Categories of Sources:

- **You:** we may collect information directly from you, for example, through transaction forms and your interactions with Western Union Agents and partners or through providing customer support or consultation, including using email, postal mail, call centers or live chat;
- **Your Use of Our Website:** we may collect information from you or your device through your use of our Website, including 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) or through automated means such as communications protocols, e-mail communications and cookies or similar technologies as described in the Global Privacy Statement section titled "INTERNET TECHNOLOGIES";
- **Affiliates, Subsidiaries or Vendors:** we may collect information about you from our affiliates, subsidiaries, or vendors who provide services on our behalf;
- **Your Use of Mobile Applications:** we may collect information from you or your device through your use of mobile applications (some of which may be managed by third parties on behalf of Western Union);
- **Social Media Networks or Publicly Available Sources:** we may collect information about you from social media or other public data sources; and
- **Advertising Networks:** we may collect information about you from advertising networks so we can serve you with advertisements we believe may be of interest to you.

**Business Purposes:** in the 12 months prior to the effective date of the Global Privacy Statement, Western Union may have shared your Personal Information for the following Business Purposes:

- **Auditing:** related to our interactions with you and any concurrent transactions, including, but not limited to, counting ad impressions, verifying positioning and quality of ad impressions, and auditing compliance with applicable standards;
- **Security Purposes:** detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
- **Debugging:** debugging to identify and repair errors that impair the intended functionality of our systems;
- **Short-term use:** short term, transient use, including, but not limited to, the contextual customization of ads shown as part of your interactions with us;
- **Performing the Services:** in addition to the purposes described in the Global Privacy Statement, maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying your information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services;
- **Internal R&D:** undertaking internal research for technological development and demonstration; and
- **Quality Purposes:** undertaking activities to verify or maintain the quality or safety of the Services and to improve, upgrade, or enhance the Services.

**Categories of Third Parties:** in the 12 months prior to the effective date of the Global Privacy Statement, Western Union may have shared your Personal Information with the following Categories of Third Parties:

- **Government entities:** government entities including law enforcement agencies;
- **Professional services organizations:** professional services organizations, such as law firms and independent auditors;
- **Advertising and social networks:** advertising and social networks (who may combine your personal information with their own records, and records available from other sources for their own marketing purposes);
- **Internet service providers;**
- **Data analytics providers;**
- **Operating systems and platforms;** and
- **Our affiliates and subsidiaries.**

### **SALE OF PERSONAL INFORMATION**

Western Union does not sell your personal information to third parties in exchange for money. Western Union does participate in advertising, marketing and analytic programs from which we and third parties with whom we contract may derive value; such exchanges may constitute a “sale” under applicable law. While participating in the above programs, in the 12 months prior to the effective date of the Global Privacy Statement, Western Union may have “sold” your personal information to a third party including:

- **Identifiers:** contact information, for example your name, e-mail address, and telephone number; and
- **Internet and Other Electronic Network Activity Information:** including the host from which you access the Internet, your IP address or device advertising ID, information about your device (such as device properties, settings, applications, storage and usage information), mobile application, 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.

### **CALIFORNIA RESIDENT RIGHTS**

California residents have the right to request that their personal information not be sold to third parties. To exercise your right to opt-out of the sale of your personal information, please follow this link [https://wuprod.service-now.com/wu\\_privacy](https://wuprod.service-now.com/wu_privacy) or submit a personal information request as described above in the section of our Global Privacy Statement entitled “ACCESSING, DELETING AND CORRECTING YOUR PERSONAL INFORMATION AND CHANGING YOUR CHOICES”.

In addition, if you are a California resident, you may have the right to request, twice in a 12-month period, the categories of personal information we have collected about you during the past 12 months and, for each category of personal information, the following information:

- the categories of sources from which we collected that information;
- our business or commercial purpose(s) for collecting that information;
- the categories of third parties to whom that information was sold or disclosed for a business purpose; and
- the business or commercial purpose(s) for which we sold or disclosed that information.

You also may have the right to request the deletion of the personal information we have collected from you. Once you have confirmed you are a California resident, you may submit a personal information request in accordance with the Global Privacy Statement section entitled “ACCESSING, DELETING AND CORRECTING YOUR PERSONAL INFORMATION AND CHANGING YOUR CHOICES” twice in any 12-

month period. Upon receiving a request, Western Union will confirm receipt of the request within 10 days and will provide information on how we will verify your identity and process your request. We will then respond to the request within 45 days.

Western Union cannot connect individual consumers to passive website visits which may affect our ability to respond to certain requests. Western Union has implemented the capability for the user to manage cookies on our websites and will only read or write cookies based on your preference level. When you visit our [website](#), you will be presented with a banner instructing you how to manage your preferences.

You may also designate an authorized agent to make a personal information request on your behalf. If you choose to designate an agent, you may be required to provide the authorized agent with written permission to make your request and verify your own identity directly with us. We may deny a request from an agent that does not submit proof that they have been authorized by you to act on your behalf.

You have the right not to be discriminated against because you exercise any right described in the Global Privacy Statement or this Addendum.

If you have previously transacted with Western Union, you have rights separate from those described above which are explained [here](#).

## **CONTACT**

Contact for More Information: for questions or concerns about our Global Privacy Statement and privacy practices, please contact us as specified in the "Contacting Us" section of the Global Privacy Statement.

## MEXICAN RESIDENT ADDENDUM TO WESTERN UNION'S GLOBAL PRIVACY STATEMENT

We care about the privacy of our Mexican consumers and are committed to collecting, using, storing, protecting, disclosing and sharing your personal information in accordance with Mexico's Federal Act on the Protection of Personal Data held by Private Parties (*Ley Federal de Protección de Datos Personales en Posesión de Particulares*). This Mexican Resident Addendum to the Western Union Global Privacy Statement ("**Addendum**") is applicable to residents of Mexico and, in conjunction with the Global Privacy Statement, is intended to address the requirements of the Mexico's Federal Act on the Protection of Personal Data held by Private Parties. Within Mexico, the applicable Western Union data controllers are Grupo Dinámico Empresarial S.A. de C.V., Servicios de Apoyo GDE SA de CV, Operaciones Internacionales OV S.A. de C.V. and Servicio Integral de Envíos, S.A. de C.V. with legal address at Av. Paseo de la Reforma No. 505, piso 17, Colonia Cuauhtémoc, Delegación Cuauhtémoc, C.P. 06500, Ciudad de México.

### HOW WESTERN UNION PROCESSES YOUR PERSONAL INFORMATION

We process your personal information for the following Primary Purposes:

- **To provide our services to you:** such as conducting money transfers, payment services, prepaid cards, and loyalty programs; sending you important service-related, administrative or transaction-related communications; and performing existing contracts with you or entering into additional Western Union products or services with you.
- **For legitimate business purposes:** such as analyzing and improving your experience regarding our products, locations, services, and operations; the running of our websites and apps; measuring marketing returns on investment and brand satisfaction (including by conducting market research surveys); providing you with customer services; and helping to protect the security and integrity of our technology, systems, and services.
- **For legal and compliance purposes:** such as complying 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 as well as using your Personal Data to validate and authenticate your identity, and utilizing third parties to help us do so. In certain cases, such as performing money transfer services, we may be unable to provide you with our Services unless you provide the necessary Personal Data.

We also process your personal information for the following non-essential, Secondary Purposes:

- **For marketing purposes:** such as, subject to your consent, notifying you of offers, promotions and updates regarding our products and Services. These may include offers by email, telephone, postal mail, SMS, social media and other communication or digital channels. You can opt out of receiving these marketing communications at any time. If you no longer want to receive marketing-related communications from us on a going-forward basis, you may opt-out by following the instructions in the relevant electronic communication or by contacting us as described in the "CONTACTING US" section. Please note that if you opt-out of receiving marketing-related communications from us, we may still send you important service, administrative or transaction-related communications.
- To assist us in providing our Services to you and help you to receive a personalized experience and assist you in carrying out transactions and accessing account information;
- To recognize you and allow you to remain signed-in during your use of our websites and/or applications without having to re-enter your password;
- To perform analytics on understanding our customers, improving their experience;

- To determine whether you came to Western Union from a banner ad or an Affiliate;
- To deliver information specific to your interests on non-Western Union websites and applications;
- To better understand the effectiveness of our promotional campaigns and whether you acted on our promotional messages;
- To promote safety, reduce financial risk and combat fraud.

Western Union will never collect or use your sensitive personal information while we provide our Services to you.

### **BIOMETRIC DATA**

In addition to the personal data mentioned above, we also inform you that at the moment you decide to hire the Western Union Money Transfer Service through our mobile application, the Manager will also collect and process your biometric data, which refer to your physical and physiological characteristics, such as your face for facial recognition and fingerprints. Said biometric data, together with the photograph of their official identification, will be sent by the Manager to the competent authorities in Mexico for their respective validation.

With the validation of your biometric information and the official identification presented, the Responsible party complies with the obligation to know and verify the identity of you as a sender of a money transfer in Mexico, in accordance with the regulation that is applicable as Money Transmitter.

### **EXERCISING YOUR ARCO RIGHTS**

As owner of the personal information, you may at any moment exercise your rights to access, rectify, cancel and/or oppose the processing of your personal information (the “**ARCO Rights**”) as well as to revoke your consent regarding the processing of any personal information which violates the terms of this Global Privacy Statement, via a written request to our Data Privacy Department at [wuprivacy@westernunion.com](mailto:wuprivacy@westernunion.com), insofar as the requested opposition and/or revocation poses no harm to third parties’ rights and in accordance with article 34 of the Law.

Your request must include: i) the name of the owner of the personal information, ii) an address whereby the request may be answered, iii) official documents that establish the identity of the data owner, or, where applicable, proof of legal representation of the Personal Data’s owner, and iv) a clear and precise description of the personal information for which you wish to exercise your ARCO rights.

Requests for rectification of personal information must include the modifications which you wish to be made and evidence to support such petition; requests regarding the revocation of your consent must communicate in a clear manner that you wish to revoke your consent regarding the processing of certain personal information, and where applicable, the reasons for such revocation.

Upon receipt of your request, We shall have a term of 20 (twenty) business days to inform you of the relevant solution, with such solution being effective as of 15 (fifteen) business days following the date on which such resolution was informed to you in writing or via e-mail. The aforementioned terms may be extended once, insofar as proper justification for the extension is given.

### **PERSONAL DATA TREATMENT CONSENT**

You, as the owner of the Personal Data, declare having read and agree to the terms and conditions provided of this Privacy Notice that is available for you, knowing that the purpose of the collection and treatment of

your Personal Data and the Generated Personal Data, as well as the procedure to exercise your ARCO rights and the revocation of your consent.

I consent and authorize that my personal data and biometric data (fingerprints and facial recognition), be collected and processed by Servicio Integral de Envíos, S.A. de C.V. and Operaciones Internacionales OV, S.A. de C.V., in accordance with the provisions of this Privacy Notice.

Your Personal Data will be treated in compliance with the safeguard levels required by Law.



## **BRAZILIAN RESIDENT ADDENDUM TO THE WESTERN UNION GLOBAL PRIVACY STATEMENT**

We value and respect the privacy of Personal Data Holders who are in Brazil, and are committed to the Treatment of their Personal Data in accordance with the General Data Protection Law (“LGPD”) and other applicable Brazilian laws and regulations. This Addendum to Western Union's Global Privacy Statement for Holders who are in Brazil (“Addendum”) is applicable to Holders residing in Brazil and other Holders who may be in the country at the time of Personal Data collection (collectively, “Brazilian Holders”), and, together with the Global Privacy Statement, aims to provide transparency on the main information related to the Treatment of your Personal Data. In the event of a conflict between the information in this Addendum and that described in the Global Privacy Statement, the information in this Addendum shall prevail.

In Brazil, the Western Union entities responsible for the Treatment (the Controllers of Personal Data) are: Western Union Corretora de Câmbio SA, a closed corporation, headquartered at Rua Iguatemi, 151, 9th floor, set 91, São Paulo / SP, CEP 01451-011, registered with CNPJ / ME under nº 13.728.156 / 0001-35; and Banco Western Union do Brasil SA, a closed corporation, headquartered at Rua Iguatemi, nº 151, 7th floor, set 72, São Paulo / SP, CEP 01451-011, registered with CNPJ / ME under nº 13.720.915 / 0001-13.

### **PERSONAL DATA WESTERN UNION COLLECTS**

For Brazilian Holders, the same Personal Data described above is collected, except for the following:

- In Brazil, no information is collected regarding participation in loyalty programs.

### **HOW WESTERN UNION COLLECTS PERSONAL DATA**

In addition to the ways described above, Western Union may still collect your Personal Data at the following points:

- Lists sent by public bodies and authorities, such as COAF;

Judicial or extrajudicial notifications received electronically or by mail.

### **HOW WESTERN UNION COLLECTS PERSONAL DATA**

In addition to reasonable organizational, technical and administrative protections that comply with applicable governmental laws and regulations in order to protect your Personal Data, we also take institutional measures with the same intent, so that we have a Privacy and Data Protection Governance Program Personal Data applied to our activities, constantly reviewed and updated.

Access to the information collected is restricted to employees and authorized persons and only when strictly necessary. Those who misuse this information, in violation of the internal policies adopted, will be subject to appropriate administrative, disciplinary and legal sanctions.

## **HOW WESTERN UNION USES PERSONAL DATA COLLECTED**

Western Union uses the personal information it collects to:

- Help us provide Services to you and help you receive a personalized experience, including the use of personal information necessary to conduct money transfers, payment services or prepaid cards;
- Recognize you and allow you to stay connected to your section during the visit without having to enter your password again;
- Conduct analyzes on how to understand our customers, improving their experience, including the use of personal information to analyze and improve our products, locations, services, operations, the functioning of this website and their customer experience, in addition to any market research;
- Determine whether you came to Western Union from a banner or an Affiliate's website;
- Provide information specific to your interests on non-Western Union websites and applications;
- Better understand the effectiveness of our promotional campaigns and whether you have taken any action based on our promotional messages, as well as to measure the return on investment in marketing and brand satisfaction;
- Promote security, reduce financial risks and fight fraud in our Services;
- Meet the legal obligations to which Western Union is subject, in addition to meeting the regulations of regulatory bodies such as BACEN and CVM, especially when related to combating money laundering and anti-terrorist financing; detecting, preventing and prosecuting fraud and theft, as well as preventing the illegitimate or prohibited use of our services or other illegal or illicit activities; and
- Responding to judicial and extrajudicial notifications, as well as exercising our defense in judicial, administrative or arbitration proceedings.

When Western Union carries out Personal Data Treatments based on a legitimate interest, this will always occur within the limits of your expectations, and never to the detriment of your fundamental interests, rights and freedoms.

It is important to note that, despite being informed in the Global Privacy Statement above, Western Union does not collect consent in the Treatment of Personal Data under the scope of this Addendum, using other legal bases provided for in the applicable legislation, except as described in the item INFORMATION ABOUT CHILDREN'S PERSONAL DATA.

Also, note that not necessarily all of the purposes described here will apply to all customers. This will depend on the product / service actually hired. To learn more about the purposes that apply to you,

enter into a contract with our Supervisor through the channels indicated in the “HOW TO CONTACT” section of this Declaration.

### **INFORMATION ABOUT CHILDREN'S PERSONAL DATA**

Western Union does not knowingly collect or store information from our retail, website or mobile apps from people under the age of 12. In any case, if such information is collected, it will only be provided with the specific and highlighted consent provided by a parent or legal guardian, under the terms of the law.

### **WHAT ARE YOUR RIGHTS AND HOW TO EXERCISE THEM**

According to Brazilian law, you can exercise the following rights with respect to your Personal Data:

a) Confirm the existence of the Treatment by Western Union or by any group company;

To exercise this right, access our Request Portal, and after identifying yourself (Customer, Agent or Employee) click on "Access to Data", also informing us in the "Request Description" that you intend to exercise the right to confirm the existence of Treatment.

b) Request access to Personal Data processed by Western Union or any company in the group;

To exercise this right, access our Application Portal, and, after identifying yourself (Customer, Agent or Employee) click on "Access to Data", also informing us in the "Request Description" that you intend to exercise the right to access the data.

c) Correct, update and / or complete your Personal Data;

To exercise this right, access our Request Portal, and, after identifying yourself (Customer, Agent or Employee) click on "Data Correction", also informing us in the "Request Description" which Data you want rectify.

d) Request the anonymization, blocking or elimination of unnecessary, excessive or illegally processed data;

To exercise this right, access our Application Portal, and after identifying yourself (Customer, Agent or Employee) click on "Restrict Processing" or on "Data Delete" and also inform us in the "Request Description" , because we are treating the data in an unnecessary, excessive or illicit way.

e) Revoke your consent, when your Personal Data is treated under this hypothesis;

To exercise this right, access our Requests Portal, and, after identifying yourself (Customer, Agent or Employee) click on "Marketing Deactivation", if applicable, or on "General Privacy Inquiry" and also inform us on the “Application Description”, which is the activity whose consent you intend to revoke.

f) Request the portability of Personal Data to another service or product supplier, upon express request;

To exercise this right, access our Application Portal, and after identifying yourself (Customer, Agent or Employee) click on "Data Portability".

g) Know with whom we share your Personal Data; and

To exercise this right, access our Application Portal, and, after identifying yourself (Customer, Agent or Employee) click on "Access to Data", also informing us in the "Request Description" that you intend to obtain information about who your data is shared by Western Union.

h) Request the review of automated decisions.

To exercise this right, access our Request Portal, and after identifying yourself (Customer, Agent or Employee) click on "Deactivation (automated decision making/profile creation", also informing us of the automated decision object of the review request.

Registered users can also access the website <https://www.westernunion.com/br/pt/home.html> and edit their Profile settings.

You also have the right to file a complaint with the National Data Protection Authority or another body described in the LGPD (such as those for consumer protection).

When we receive a request, we may ask for additional information from you to confirm your identity. In some situations, we may refuse to act or we may impose limitations on your rights as permitted by applicable law, and we will explain the reasons that justified the failure to comply with your request, such as requests involving Personal Data and / or documents from other Owners.

To exercise such rights, access [https://wuprod.service-now.com/wu\\_privacy](https://wuprod.service-now.com/wu_privacy) or contact Western Union through the section entitled "HOW TO CONTACT US". We will endeavor to respond to your request immediately, if required, or within 15 days. Depending on the complexity of your request, we may extend this period to serve you accordingly.

## **HOW TO CONTACT US**

If you have any questions or complaints about how we treat your Personal Data, we ask that you register your request in writing. We will review your query and will usually respond in writing within 15 days of receipt. You can also contact us, including our Person in Charge of the Processing of Personal Data:

Western Union's Data Protection Officer

email: [wuprivacy@westernunion.com](mailto:wuprivacy@westernunion.com)

To contact us via a toll-free or local phone number, click this link to Talk to WU Customer Service: <https://www.westernunion.com/br/pt/contact-us.html>.

Other, more specific privacy statements may be applicable for a particular application or service. In such cases, the specific privacy statement overrides this in the event of a conflict of information.

## **WESTERN UNION LEGAL ENTITIES**

<b><u>Entity</u></b>	<b><u>Contact Information / Address</u></b>
Western Union Financial Services (Australia) PTY. LTD.	Level 7 400 George Street Sydney, NSW 2000 Australia
Western Union International Bank GmbH (Austria)*	The ICON Vienna: Turm 24, 11th Floor, Wiedner Gürtel 13, 1100 Vienna, Austria
Western Union Retail Services Belgium	Place Louise 6, 1060 Saint-Gilles, Belgium, Belgium
Western Union Financial Services (Canada), Inc.	925 Marine Dr, North Vancouver, V7P 1S2 Canada
Western Union Network (Canada) Company	Suite 900, 1959 Upper Water Street, Halifax, NS, Canada B3J 3N2
Western Union Payment Services GB Limited	200 Hammersmith Road, London, United Kingdom, W6 7DL
Western Union Payment Services Ireland Ltd (Ireland)**	Unit 9 Richview Business Park Clonskeagh, Dublin, 14 Ireland
Western Union International Limited (Ireland)	Unit 9 Richview Business Park Clonskeagh, Dublin, 14 Ireland
Western Union Network (Ireland) Limited	Unit 9 Richview Business Park Clonskeagh, Dublin, 14 Ireland
Western Union Japan KK	Metro City Kamiyacho 7f, 1-5, Toranomom 5-Chome, Minato-Ku Tokyo, Japan
Western Union Payments (Malaysia) Sdn Bhd	16th Floor, Wisma Sime Darby, Jalan Raja Laut, 50350 Kuala Lumpur, Malaysia
Western Union MT East (Russia)	16A Bldg, Leningradskoe shosse 125171, Moscow, Russia
Western Union Turkey Ödeme Hizmetleri A.Ş. (Turkey)	Maslak Mahallesi Ahi Evran Cad. No: 21 Polaris Plaza K:5 34398 Sarıyer, Istanbul, Turkey
Western Union Financial Services, Inc. (USA)	7001 E Belleview Avenue, Denver, CO
Grupo Dinámico Empresarial S.A. de C.V., Servicios de Apoyo GDE SA de CV, Operaciones Internacionales OV S.A. de C.V. and Servicio Integral de Envíos, S.A. de C.V.	Av. Paseo de la Reforma No. 505, piso 17, Colonia Cuauhtémoc, Delegación Cuauhtémoc, C.P. 06500, Ciudad de México
<p>*Data controller for Services as described in this Statement in Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Faroe Islands, Finland, France, Germany, Greenland, Hungary, Iceland, Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia (Slovak Republic), Slovenia, Spain, Sweden, Switzerland, United Kingdom</p> <p>** Data controller for in-person retail services in Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Faroe Islands, Finland, France, Germany, Greenland, Hungary, Iceland, Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia (Slovak Republic), Slovenia, Spain, Sweden, Switzerland, United Kingdom</p>	

## **NON-AFFILIATE LOCAL LICENSING ENTITIES**

<b><u>Country</u></b>	<b><u>Entity</u></b>	<b><u>Contact Information / Address</u></b>
Bahrain	NEC B.S.C partnership	<a href="http://www.nec-bh.com/">http://www.nec-bh.com/</a>
Costa Rica	Airpak Fidelity Corp partnership	Airpak Fidelity Corp Paseo Colon, Torre Mercedes Piso 7, San Jose Costa Rica Telephone: (506) 4800-1703
Columbia	Acciones & Valores S.A.  Giros y Finanzas Compañía de Financiamiento S.A.	Calle 72, No. 7-64, Piso 11, Bogotá, Columbia  Calle 4, No. 27-52, Santiago de Cali, Columbia
Ecuador	Transferunion S.A. partnership	<a href="https://www.redactiva.com/redactiva/contactanos">https://www.redactiva.com/redactiva/contactanos</a> Email: comentarios@activaecuador.com
Guatemala	Airpak Fidelity Corp partnership	Airpak Fidelity Corp: 16 Calle 0-53 Zona 10, Edif. Torre Internacional Nivel 15, Guatemala Telephone: 502-2410-1051
Jamaica	GraceKennedy Remittance Services partnership	GraceKennedy Remittance Services Ltd. 2-6 Trafford Place Kingston 5 Jamaica Telephone: (876) 926-2454 Email: wuonline@gkco.com
Kuwait	Aman Exchange Company W.L.L.	<a href="http://www.amankuwait.com/AmanWebsite/index.html">http://www.amankuwait.com/AmanWebsite/index.html</a> Email: info@amankuwait.com
Malaysia	Western Union Payments (Malaysia) Sdn Bhd (WUPM)	Telephone: 800-81-3399 Email: malaysia.customer@westernunion.com
Qatar	Alfardan Exchange LLC	Telephone: 800 3950 Email: wu.support@alfardanexchange.com.qa
Ukraine	PrivatBank, JSC CB PrivatBank (Ukraine)	Email: hotline@privatbank.ua
United Arab Emirates	Al Fardan Exchange LLC	Email: wu.support@alfardanexchange.com