

# AIRWALLEX

## PRIVACY POLICY (GLOBAL)

Last updated: 8 July 2022

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. 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.

Here is a summary of the information contained in this Policy (although it is not a substitute for reading the full Policy). We have included hyperlinks to help you jump to the relevant sections with more detail).

<b>What does this Policy apply to?</b>	This Policy applies to any user of products, services, technologies or functionalities offered by us anywhere in the world, and to any visitor to our website, mobile app, or other channel.	<a href="#">Link</a>
<b>Who is the data controller?</b>	“We” in this Policy refers to Airwallex. The data controller of your personal information varies by your location:  <u>Australia</u> Airwallex Pty Limited  <u>EEA/Switzerland</u> Airwallex (Netherlands) B.V.  <u>Malaysia</u> Airwallex (Malaysia) Sdn Bhd  <u>New Zealand</u> Airwallex (New Zealand) Limited  <u>Singapore</u> Airwallex (Singapore) Pte Ltd  <u>UK</u> Airwallex (UK) Limited  <u>United States</u> Airwallex US, LLC  <u>Hong Kong and all other countries</u> Airwallex (Hong Kong) Limited or UniCard Solution Limited (depending on the Services provided)	<a href="#">Link</a>

<p><b>What types of information do we collect and why?</b></p>	<p>When you set up an account to use our Services, we require information (such as your name, address, government-issued ID, tax identifier, business information) to set this up. We also process certain identity information when we undertake our KYC/AML process. We will process information in connection with transactions (including payment information and the beneficiary of payment). Our Service also processes network, device and usage information in order to maintain the integrity of our systems. <b>You can read more about what personal information we process and why below.</b></p>	<p><a href="#">Link</a></p>
<p><b>How is your information shared?</b></p>	<p>Our affiliates and select third parties support the operation of the Services and will necessarily transfer personal information in order to facilitate the Services and services provided by third parties at your request and/or with your consent. If a third party is engaged to support the Services, this is solely for the purpose of the Services and we require that the third party comply with appropriate safeguards to protect personal information. Services supported and/or provided by third parties may include support services, effecting transactions, account information services, payment initiation services, cloud services, analytics, market research, fraud detection, Enterprise Partners' services and other functions in connection with the Services. We also have affiliates around the world who help us deliver the Services and we may be required by a court or legal obligation to disclose certain information in some circumstances. <b>You can read more about how we share your personal information below.</b></p>	<p><a href="#">Link</a></p>
<p><b>Where do we store your information?</b></p>	<p>Our servers are located in datacenters hosted by Google Cloud Platform and Alibaba Cloud in Australia, Hong Kong, Japan, Mainland China, the Netherlands, Singapore, and the United States. We may access these servers from other locations as necessary to support the operation of the Services. <b>You can read more about where your personal information is stored below.</b></p>	<p><a href="#">Link</a></p>
<p><b>How long do we retain information for?</b></p>	<p>We only retain personal information for so long as it is required to fulfil the purpose for which it was collected, unless we are subject to legal or regulatory obligations to retain such information. <b>You can read more about how long we retain specific categories of personal information below.</b></p>	<p><a href="#">Link</a></p>

<p><b>What rights do I have to processing of my information?</b></p>	<p>Depending on where you are, you may have certain rights with respect to your personal information, such as rights of access, to receive a copy of your information, or to delete your information or restrict or object to our processing of your information. <b>You can read more about your rights below.</b></p>	<p><a href="#">Link</a></p>
<p><b>How can I contact Airwallex?</b></p>	<p>If you have questions or concerns about this Policy or a specific request related to your personal information, please contact us at <a href="mailto:security@airwallex.com">security@airwallex.com</a>.</p>	<p><a href="#">Link</a></p>
<p><b>How will we notify you of changes to this Policy?</b></p>	<p>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.</p>	<p><a href="#">Link</a></p>
<p><b>Are there specific terms that apply to certain countries?</b></p>	<p>Yes. <b>You can read more about the specific processing activities for certain jurisdictions in the Jurisdiction-Specific Addenda below.</b></p>	<p><a href="#">Link</a></p>

## 1. SCOPE OF POLICY

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.

## 2. DATA CONTROLLER

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.

Our privacy team can be contacted at [privacy@airwallex.com](mailto:privacy@airwallex.com).

The data controller that is responsible for your personal information differs by the location in which you are ordinarily resident or which entered into an agreement to provide Services to you.

Country of Residence	Data Controller	Address
Australia	Airwallex Pty Limited	Level 7, 15 William Street, Melbourne, VIC 3000, Australia
United States	Airwallex US, LLC	1390 Market Street, Suite 200, San Francisco, CA 94102
Hong Kong and all other countries	Airwallex (Hong Kong) Limited or UniCard Solution Limited (depending on the Services provided)	Suites 6308-10, 63/F, One Island East, 18 Westlands Road, Quarry Bay, Hong Kong, China  6308, 63/F One Island East, 18 Westlands Road, Quarry Bay, Hong Kong
UK	Airwallex (UK) Limited	1 Long Lane, London, SE1 4PG, United Kingdom
EEA or Switzerland	Airwallex (Netherlands) B.V.	Vijzelstraat 68, 1017HL Amsterdam
Malaysia	Airwallex (Malaysia) Sdn Bhd	WeWork Mercu 2, Level 40, No.3 Jalan Bangsar, 59200, Kuala Lumpur, Federal Territory of Kuala Lumpur, Malaysia

New Zealand	Airwallex (New Zealand) Limited	c/- CSNZ, Level 5, 79 Queen Street, Auckland 1010
Singapore	Airwallex (Singapore) Pte Ltd	30, Cecil Street, #19-08, Prudential Tower, Singapore 049712

### 3. THE TYPES OF PERSONAL DATA WE USE

By “**personal information**” we mean information that 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. The specific categories of personal information which we process are listed in the section “[How We Use Your Personal Information](#)” below. This section describes the different types of personal information we collect from you and how we process it.

#### A. INFORMATION YOU PROVIDE DIRECTLY TO US

- **Account registration:** To use our Services, you must provide certain personal information 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.
- **Survey, feedback, and promotions:** 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.

#### B. INFORMATION AUTOMATICALLY COLLECTED FROM YOUR USE OF SERVICES

We automatically collect certain data from you when you use the Services or visit any of our Sites where we have a legitimate interest (such as to prevent fraud or misuse, or to understand your use of and improve our Services). This includes:

- 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 your personal information mentioned above.

**C. INFORMATION COLLECTED 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.

**D. COOKIES**

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.

**4. HOW WE USE YOUR PERSONAL INFORMATION**

This section provides more detail on the types of personal information we collect from you, and why. For users who live in the United Kingdom, the European Economic Area or Switzerland (each a “**Relevant Jurisdiction**”), it also identifies the legal basis under which we process your personal information.

Personal Information		Use	Legal Basis (only relevant if you are located in a Relevant Jurisdiction)
Account and Profile Information	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.	<p><b>We use this information:</b></p> <p><b>To provide Services, e.g.</b></p> <ul style="list-style-type: none"> <li>To process payments to your suppliers and other recipients;</li> <li>To provide customer support;</li> <li>To enable you to access and use the Airwallex platform; and</li> <li>To evaluate your application to use our Services.</li> </ul> <p><b>To prevent fraud or misuse, e.g.</b></p>	Necessary to perform our contract with you to provide the Services, and it is in our legitimate interests to prevent fraud or misuse.

		<ul style="list-style-type: none"> <li>● To verify your identity or authenticate your right to access an account or other information.</li> <li>● To manage risk, fraud and abuse of our Services and Sites.</li> <li>● To conduct manual or system monitoring to protect against fraud and other harmful activity.</li> </ul> <p><b>To communicate with you, e.g.</b></p> <ul style="list-style-type: none"> <li>● To respond to your inquiries and support requests;</li> <li>● To send you technical notices, updates, security alerts and other administrative messages; and</li> <li>● To provide information related to your transactions including confirmations, receipts and tracking notices.</li> </ul>	
<b>Demographic Data</b>	<b>We may also collect demographic data about you including your employment history, education, marital status, income and other similar information.</b>	<b>We use this information to:</b> <ul style="list-style-type: none"> <li>● develop new products or enhance existing products and services; and</li> <li>● monitor and analyze trends, usage and other user activities on our Sites to optimize user experience.</li> </ul>	<b>It is in our legitimate interests to use this information to improve our Services and Sites.</b>
<b>Identity Verification Documents</b>	<b>To comply with laws and regulations, we may collect copies of your government-issued identification (including passport, driver’s license or national ID card) or</b>	<b>We use this information to provide the Services, specifically:</b> <ul style="list-style-type: none"> <li>● to create your account for the Services in accordance with your request;</li> <li>● to verify your identity or authenticate your right to</li> </ul>	<b>Necessary to satisfy our legal obligations under applicable law to verify your identity, and it is in our legitimate interests to</b>

	<p>other authentication information, all of which may include photographs of you.</p>	<p>access an account or other information;</p> <ul style="list-style-type: none"> <li>● to evaluate your application to use our Services;</li> <li>● to manage risk, fraud and abuse of our Services and Sites; and</li> <li>● to conduct manual or system monitoring to protect against fraud and other harmful activity.</li> </ul>	<p>prevent fraud or misuse.</p>
<p>Payment Information</p>	<p>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.</p>	<p>We use this information to provide the Services, specifically to process payments to your suppliers and other recipients.</p>	<p>Necessary to perform our contract with you to provide the Services, and necessary to satisfy our legal obligations under applicable law in relation to payment transactions.</p>
<p>Beneficiary Information</p>	<p>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.</p>	<p>We use this information:</p> <p>To provide Services, e.g.</p> <ul style="list-style-type: none"> <li>● To process payments to your suppliers and other recipients;</li> </ul> <p>To prevent fraud or misuse, e.g.</p> <ul style="list-style-type: none"> <li>● To verify your identity or authenticate your right to access an account or other information.</li> <li>● To manage risk, fraud and abuse of our Services and Sites.</li> <li>● To conduct manual or system monitoring to protect against fraud and other harmful activity.</li> </ul>	<p>Necessary to perform our contract with you to provide the Services, and it is in our legitimate interests to prevent fraud or misuse.</p>

<p><b>Business Entity Information</b></p>	<p>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.</p>	<p><b>We use this information:</b></p> <p><b>To provide Services, e.g.</b></p> <ul style="list-style-type: none"> <li>● To process payments to your suppliers and other recipients;</li> <li>● To provide customer support;</li> <li>● To enable you to access and use the Airwallex platform; and</li> <li>● To evaluate your application to use our Services.</li> </ul> <p><b>To prevent fraud or misuse, e.g.</b></p> <ul style="list-style-type: none"> <li>● To verify your identity or authenticate your right to access an account or other information.</li> <li>● To manage risk, fraud and abuse of our Services and Sites.</li> <li>● To conduct manual or system monitoring to protect against fraud and other harmful activity.</li> </ul> <p><b>To communicate with you, e.g.</b></p> <ul style="list-style-type: none"> <li>● To respond to your inquiries and support requests;</li> <li>● To send you technical notices, updates, security alerts and other administrative messages; and</li> <li>● To provide information related to your transactions including confirmations, receipts and tracking notices.</li> </ul>	<p><b>Necessary to perform our contract with you to provide the Services, and it is in our legitimate interests to prevent fraud or misuse.</b></p>
<p><b>Background Information</b></p>	<p>To the extent permitted by applicable law, we may</p>	<p><b>We use this information to prevent fraud or misuse, e.g.</b></p>	<p><b>It is in our legitimate interests to</b></p>

	<p>obtain back reports about you from public records. In order to obtain such reports, we may use information or personal information you provide to us.</p>	<ul style="list-style-type: none"> <li>● To verify your identity or authenticate your right to access an account or other information.</li> <li>● To manage risk, fraud and abuse of our Services and Sites.</li> <li>● To conduct manual or system monitoring to protect against fraud and other harmful activity.</li> </ul>	<p>prevent fraud or misuse.</p>
<p>Log Data</p>	<p>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.</p>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>● provide the Services; and</li> <li>● prevent fraud or misuse; and</li> <li>● understand your use of and improve our Services.</li> </ul>	<p>Necessary to perform our contract with you to provide the Services, and it is in our legitimate interests to prevent fraud or misuse.</p>
<p>Device Information</p>	<p>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.</p>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>● provide the Services;</li> <li>● prevent fraud or misuse; and</li> <li>● understand your use of and improve our Services.</li> </ul>	<p>Necessary to perform our contract with you to provide the Services, and it is in our legitimate interests to prevent fraud or misuse.</p>
<p>Usage Information</p>	<p>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</p>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>● provide the Services;</li> <li>● evaluate your satisfaction with our Services, platform and features;</li> <li>● develop new products or enhance existing products and services; and</li> </ul>	<p>Necessary to perform our contract with you to provide the Services, and it is in our legitimate interests to protect the integrity of the Services and</p>

	<p>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 Cookie Policy.</p>	<ul style="list-style-type: none"> <li>• monitor and analyse trends, usage and other user activities on our Sites to optimize user experience and to improve our Services.</li> </ul>	<p>improve our operations.</p>
<p><b>Location Information</b></p>	<p>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.</p>	<p><b>We use this information to:</b></p> <ul style="list-style-type: none"> <li>• provide the Services;</li> <li>• enable you to access and use the Airwallex platform;</li> <li>• manage risk, fraud and abuse of our Services and Sites; and</li> <li>• conduct manual or system monitoring to protect against fraud and other harmful activity.</li> </ul>	<p>Necessary to perform our contract with you to provide the Services, and it is in our legitimate interests to prevent fraud or misuse.</p>
<p><b>Communications Data</b></p>	<p>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.</p>	<p><b>We use this information:</b></p> <ul style="list-style-type: none"> <li>• to respond to your inquiries and support requests;</li> <li>• to send you technical notices, updates, security alerts and other administrative messages; and</li> <li>• to provide information related to your transactions including confirmations, receipts and tracking notices.</li> </ul>	<p>Necessary to perform our contract with you to provide the Services.</p>

<b>Call Recordings</b>	<b>Voice recordings of you captured when you contact us including interactions with our customer service or sales teams.</b>	<b>We use this information to respond to your inquiries and support requests.</b>	<b>Necessary to perform our contract with you to provide the Services.</b>
<b>Various Information</b>	<b>Any information you may provide us when you respond to surveys.</b>	<b>We use this information to allow you to participate in surveys in accordance with your request.</b>	<b>We collect this information with your consent.</b>
	<b>Any information you may provide us when you post on community forums.</b>	<b>We use this information to allow you to post on community forums and use the Services and our Sites.</b>	<b>Necessary to perform our contract with you to provide the Services.</b>
	<b>Any information you may provide us when you participate in contests.</b>	<b>We use this information to facilitate promotional contests.</b>	<b>Necessary to perform our contract with you to provide the Services.</b>
	<b>Any information you may provide us when you participate in promotions or request to receive promotional information.</b>	<b>We use this information to</b> <ul style="list-style-type: none"> <li>● to deliver promotional offers, incentives, and targeted marketing in accordance with your preferences (as permitted by applicable law); and</li> <li>● to provide invitations and information about events or events held by our partners.</li> </ul>	<b>We collect this information with your consent.</b>

## 5. TRANSFERS AND STORAGE

To support our global operations and pursuant to our contract with you to provide the Services, we and our service providers may store or process your personal information 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 information to a region or country outside of your country of residence, the regions and countries to which your personal information may be transferred to include Australia, Germany, Hong Kong, India, Japan, Lithuania, Mainland China, Malaysia, the Netherlands, New

Zealand, the Philippines, Singapore, the United Kingdom, and the United States. Our servers for the Services are located in Australia, Hong Kong, Japan, Mainland China, the Netherlands, Singapore, and the United States.

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 information. Any transfer of your personal information 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. For example, transfers of personal information outside the EEA or the UK will be made under the European Commission’s model contracts for the transfer of personal data to third countries (i.e. the standard contractual clauses), or any equivalent contracts issued by the relevant authority of the UK, as relevant.

**INFORMATION SHARING AND DISCLOSURE**

*Only where necessary* will we share your personal information with third parties. Situations where this occur are:

<b>Third Party</b>	<b>Purpose</b>
<b>Third party service providers</b>	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, cloud storage, conduct market research, marketing analytics, detect fraud, verify identity and perform audits or other functions. We will share your personal information 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 information are contractually bound to protect and use your information only in accordance with this Policy.
<b>Our corporate affiliates</b>	To facilitate or support us and our Enterprise Partners in providing products and services to you, we may share your personal information within our worldwide corporate family of companies among entities that are related by common control or ownership. All related group companies may only use your personal information in accordance with this Policy.
<b>Enterprise Partners</b>	Our Services may be offered to you in conjunction with or facilitated by other financial institutions or other enterprises (an “Enterprise Partner”) and their products and services. Such Enterprise Partners may include (without limitation) entities which operate online marketplaces or other e-commerce platforms through which you are able to sell your goods, services, content or other products. Such Enterprise Partners may have access to your personal information but only to the extent required to enable use by you of our or their products and services.
<b>Regulatory Authorities:</b>	There are circumstances in which we are legally required to disclose information about you to authorities, such as to comply with a legal

<p><b>regulators, judicial authorities and law enforcement agencies, and other third parties for safety, security, or compliance with the law.</b></p>	<p>obligation or processes, enforce our terms, address issues relating to security or fraud, or protect our users. These disclosures may be made with or without your consent, and with or without notice, in compliance with the terms of valid legal process such as a subpoena, court order, or search warrant. We are usually prohibited from notifying you of any such disclosures by the terms of the legal process. We may seek your consent to disclose information in response to a governmental entity's request when that governmental entity has not provided the required subpoena, court order, or search warrant. We may also disclose your information to:</p> <ul style="list-style-type: none"> <li>● enforce our User Agreement or other applicable agreements or policies, including investigation of any potential violation thereof;</li> <li>● detect, prevent or otherwise address security, fraud or technical issues;</li> <li>● protect our rights, property, privacy, or security, or that of others, as permitted by law; or</li> <li>● comply with applicable law, legal process or governmental orders.</li> </ul>
<p><b>Social Media Platforms</b></p>	<p>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.</p>
<p><b>Potential Acquirers of our business</b></p>	<p>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 information 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.</p>
<p><b>Other Authorized Parties</b></p>	<p>If you request (as part of the Services provided to you) or provide your consent, we may share your information including your personal information with a third party not defined in this Policy. Such third parties may include third party financial service providers, including but not limited to account information service providers and payment initiation service providers. Such disclosure will only be carried out in the manner you requested or consented to, and/or the manner described to you (whether by us or the relevant third party) at the time you agreed to the sharing, and in accordance with applicable law. Authorizing a third-party service provider, application, or website to access your Airwallex account or</p>

	participating in certain promotional activities constitutes such request and consent to share your information.
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**6. DATA RETENTION**

We will retain your personal information 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 information even after you close your Airwallex account or request deletion of your personal information. 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 information or, where applicable, sufficiently anonymize the personal information.

For further details on how long we keep your data, please refer to the time periods set out below.

Personal Information	Retention Policy
<b>Account and Profile Information</b> <b>Identity Verification Documents</b> <b>Business Entity Information</b> <b>Background Information</b> <b>Log Data</b> <b>Device Information</b>	<b>Stored for the lifetime of your use of the Services (i.e. until account deletion in accordance with your request), plus no less than 5 years.</b>

<sup>1</sup> The time period(s) stated herein are indicative; we generally aim to retain data only for as long as necessary to achieve the relevant intended purpose(s), subject to any retention required to comply with applicable law or fulfill any ongoing obligations to you.

<b>Usage Information</b> <b>Communications Data</b> <b>Call Recordings</b> <b>Other Information</b> <b>Payment Information</b> <b>Beneficiary Information</b> <b>Location Information</b>	
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## 7. YOUR RIGHTS AND CHOICES

You have certain rights relating to your personal information. The ability and extent to which you may exercise these rights will vary depending on your location.

The following rights (described in detail below) apply to users in a Relevant Jurisdiction.

If you are located outside of a Relevant Jurisdiction, please review the section on [Jurisdiction- Specific Rights](#) for more information about the privacy rights afforded to you in your country or state of residence. To exercise any of your rights, please contact us at [privacy@airwallex.com](mailto:privacy@airwallex.com).

### A. ACCESS, CORRECTION, ERASURE

You may review, correct or update information you provided to us at any time by logging into your Airwallex account. 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 information about an individual other than you or the information is subject to legal or proprietary protections. If there is any other personal information you believe we process that you would like to access, correct or erase, please contact us at [privacy@airwallex.com](mailto:privacy@airwallex.com).

### B. PORTABILITY

You may have the right to receive a copy of certain personal information we process about you. This comprises any personal information we process on the basis of your consent (e.g., survey information) or pursuant to our contract with you (e.g., your name). You may have the right to receive this information in a structured, commonly used and machine-readable format. You may also have the right to request that we transfer that personal information to another party, with certain exceptions. We will provide further information to you about this if you make such a request.

### C. RESTRICTION OF PROCESSING

You may have a right to require us to stop processing the personal information we hold about you other than for storage purposes in certain circumstances. Please note, however, that if we stop processing the personal information, we may use it again if there are valid grounds under data protection laws for us to

do so (for example, for the defence of legal claims or for another's protection). Where we agree to stop processing the personal information, we will try to tell any third party to whom we have disclosed the relevant personal information so that they can stop processing it too.

#### **D. OBJECTION**

You may have the right to object to our processing of your personal information. To the extent provided by applicable laws and regulations, you may withdraw any consent you previously provided to us for certain processing activities by contacting us at [privacy@airwallex.com](mailto:privacy@airwallex.com). Where consent is required to process your personal information, if you do not consent to the processing or if you withdraw your consent we may not be able to deliver the expected service.

### **8. DEVICE & MARKETING**

#### **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 to your device settings to restrict collection of certain information.

#### **Notifications**

We may from time to time send you notifications when we consider it necessary to do so (for example, when we temporarily suspend access to the Services for maintenance, or security, privacy or administrative-related communications). You may not opt-out of these service-related notifications, which are not promotional in nature.

#### **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.

### **9. ADVERTISING AND ANALYTICS**

We may partner with third parties to display advertisements to you on websites you visit. 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](#).

## **10. SECURITY**

We implement and update technical and physical security measures to safeguard your personal information 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 information, 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 information 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.

## **11. CHILDREN'S PRIVACY**

Our Sites and Services are not intended for or directed at children. By children we mean users under the age of 16 or in the case of a country where the minimum age for processing personal information differs, such different age.

We do not knowingly collect any information from children. If we obtain actual knowledge that we have collected personal information from a child, 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 child.

## **12. THIRD PARTY LINKS AND SERVICES**

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.

## **13. UPDATES TO THIS POLICY**

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. 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.

## **14. CONTACT**

If you have questions or concerns about this Policy or a specific request related to your personal information, please contact us at [privacy@airwallex.com](mailto:privacy@airwallex.com).

If you wish to make an inquiry regarding how we process your personal information, please contact us at [privacy@airwallex.com](mailto:privacy@airwallex.com) and we will endeavour to deal with your request as soon as possible. This is

without prejudice to your right to launch a claim with the data protection authority in the country in which you live or work where you think we have infringed data protection laws.

## **15. LANGUAGE**

Except as otherwise set out by law, in the event of any inconsistency between the English version and local language version of this Policy (where applicable), the English version shall prevail.

## JURISDICTION-SPECIFIC RIGHTS

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Some jurisdictions' laws contain additional terms for users of the Services, which are set out in this section. If you are a customer of Airwallex entity located in one of the jurisdictions below, the terms set out below under the name of your jurisdiction apply to you in addition to the terms set out in our Policy above.

### For customer of Airwallex Australia

#### *Overseas Recipients*

*You consent to the transfer of personal information to third parties outside Australia, and acknowledge that while we take reasonable steps to ensure that such third parties handle your personal information in accordance with Australian privacy laws, we will not be liable for the acts and omissions of these overseas third party recipients.*

#### *Access*

You have the right to access personal information we hold about you, how we use it, and who we share it with. You can access the personal information you have made available as part of your account by logging into your account. If you believe we hold any other personal information about you, please contact us at [privacy@airwallex.com](mailto:privacy@airwallex.com)

#### *Correction*

You have the right to correct any of your personal information we hold that is inaccurate. You can access the personal information we hold about you by logging into your account. If you believe we hold any other personal information about you and that information is inaccurate, please contact us at [privacy@airwallex.com](mailto:privacy@airwallex.com)

#### *Transacting Anonymously*

Where possible we will give you the option of not identifying yourself when using the Service. You acknowledge that if you do not provide us with your personal information, we may be unable to provide you with access to certain features or sections of the Services.

#### *Your Rights*

If you are dissatisfied with our response to your request for access to, or correction of, your personal information or your privacy complaint in respect of your personal information, you may contact the Office of the Australian Information Commissioner (Telephone: +61 1300 363 992 or email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)).

#### *Data Transfers*

While we take reasonable steps to ensure that third party recipients of your personal information comply with privacy laws that are similar to those of your jurisdiction, you acknowledge and agree that we cannot control the actions of third party recipients and so cannot guarantee that they will comply with those privacy laws.

#### For customers of Airwallex United States and resident in California

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

#### *Collection and Disclosure of Personal Information*

Over the past 12 months, we have collected and disclosed the following categories of personal information from or about you or your device:

- **Identifiers**, such as your name, email address, residential address, date of birth, social security number, driver's license number, passport number, tax identification number or other similar identifiers, government issued identification information, bank account details, credit card or debit card numbers and IP address. This information is collected directly from you and your device.
- **Internet or other electronic network activity information**, such as your information regarding your use of the Services, including your user preferences and other settings selected by you, server logs, and other device information as described in the main Policy. This information is collected directly from you and your device.
- **Commercial information** about any transactions within the Services such transaction information when you collect or make payments. This information is collected directly from you and your device.
- **Geolocation data** such as your IP address or mobile device GPS. This information is collected directly from you.
- **Professional or employment-related information** such as your profession if you choose to provide it in a survey. This information is collected directly from you.
- **Other information** described in subdivision (e) of Section 1798.80, including information about your gender, nationality, or age. This information is collected directly from you in the context of being our consumer.

*We collect your personal information for the following purposes:*

- To provide you with the Services, maintain your account, provide customer service and process payments.
- To improve our services, including the functionality of the Services and Sites.
- For security and verification purposes, including to prevent and detect fraudulent activity.
- To address and remediate technical issues and bugs.
- To communicate with you.
- To market and promote our Services.

For additional information about what each type of personal information is used for, see [this table](#) in the main portion of the Privacy Policy.

*We disclose personal information to the following types of entities:*

- Our corporate affiliates who process your personal information in order to operate the Services.

- Other companies that provide services on our behalf in support of the Service and who are prohibited by contract from retaining, using, or disclosing personal information for any purpose other than for providing their services to us.
- Our Enterprise Partners.
- Regulators, judicial authorities and law enforcement agencies
- Entities that acquire all or substantially all of our business.

***In the past 12 months, we have not sold Personal Information of California residents within the meaning of “sold” in the CCPA.***

***Rights to know:***

If you are a California resident, you have the right to:

- Request access to the following information covering the 12 months preceding your request:
  - the categories of personal information about you that we collected;
  - the categories of sources from which the personal information was collected;
  - the purpose for collecting personal information about you;
  - the categories of third parties to whom we disclosed personal information about you and the categories of personal information that was disclosed (if applicable) and the purpose for disclosing the personal information about you; and
  - the specific pieces of personal information we collected about you;
- Request we delete personal information we collected from you, unless CCPA recognises an exception; and
- Be free from unlawful discrimination for exercising your rights including providing a different level or quality of services or denying goods or services to you when you exercise your rights under the CCPA.

We aim to fulfil all verified requests within 45 days pursuant to the CCPA. If necessary, extensions for an additional 45 days will be accompanied by an explanation for the delay.

***How to Exercise Your Rights***

First, you may wish to log into your account and manage your data from there. 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 customers of Airwallex Canada**

If you are located in Canada and wish to obtain written information about our policies and practices with respect to our service providers located outside Canada, you may contact us at [privacy@airwallex.com](mailto:privacy@airwallex.com). We are able to answer any questions users may have about the collection, use, disclosure or storage of personal information by our service providers.

Where we use service providers who might have access to your personal information, we require them to have privacy and security standards that are comparable to ours. We use contracts and other measures with our service providers to maintain the confidentiality and security of your personal information and to prevent it from being used for any purpose other than as provided in this Policy.

### For customers of Airwallex Hong Kong

If you are located in Hong Kong, you have legal rights in relation to the personal information we hold about you (to the extent permitted under applicable laws and regulations).

You are entitled to make a subject access request to receive a copy of the data we process about you, a data correction request as well as a right to reject the use of your personal information for direct marketing purposes. A fee may be chargeable by us for complying with a data access request.

### For customers of Airwallex Malaysia

#### *Parental and Guardian Consent*

In the event you are agreeing to this Policy in order for a minor to access and use the Services, you hereby consent to the provision of personal information of the minor to be processed in accordance with this Policy and you personally accept and agree to be bound by the terms in this Policy. Further, you hereby agree to take responsibility for the actions of such minor, and that minor's compliance with this Privacy Policy.

#### *Rights of Data Subjects*

*Right of access:* You have the right to request access to and obtain a copy of the personal information that we have collected and is being processed by or on behalf of us. We reserve the right to impose a fee for providing access to your personal information in the amounts permitted by law. When handling a data access request, we are permitted to request certain information in order to verify the identity of the requester to ensure that he/she is the person legally entitled to make the data access request.

*Right of correction:* You may request for the correction of your personal information.

*Right to limit processing of your Personal Data:* You may request limiting the processing of your personal information by using the contact details provided above. However this may affect our provision of the Services to you.

#### *Contact*

If you would like to make any inquiries, complaints, access or correction requests or request for us to limit the processing of your personal information, please contact us at:

- Airwallex privacy team
- Contact Number: +61 13 32 99
- Email to: [privacy@airwallex.com](mailto:privacy@airwallex.com)

### For customers of Airwallex New Zealand

#### *Overseas Recipients*

While we take reasonable steps to ensure that third parties outside New Zealand handle your personal information in accordance with New Zealand privacy laws, you acknowledge that we do not control, or accept liability for, the acts and omissions of these overseas third party recipients.

#### *Access and Correction*

You have the right to access personal information we hold about you, how we use it, and who we share it with. You have the right to request the correction of any of your personal information we hold that is inaccurate. You can access or correct your personal information by logging into your account. If you believe we hold any other personal information about you or that such information is inaccurate, please contact us at [privacy@airwallex.com](mailto:privacy@airwallex.com).

#### *Complaints*

If you would like to make a privacy complaint in respect of your personal information, you may contact the Office of the New Zealand Privacy Commissioner ([www.privacy.org.nz](http://www.privacy.org.nz)).

#### **For customers of Airwallex Singapore**

##### *Access*

You have the right to access your personal information, how we use it, and who we share it with. You can access the personal information you have made available as part of your account by logging into your account. If you believe we hold any other personal information about you, please contact us at [privacy@airwallex.com](mailto:privacy@airwallex.com).

##### *Correction*

You have the right to correct any of your personal information that is inaccurate. You can access the personal information we hold about you by logging into your account. If you believe we hold any other personal information about you and that information is inaccurate, please contact [privacy@airwallex.com](mailto:privacy@airwallex.com).

Our privacy team for the purposes of compliance with the Personal Information Protection Act 2012 can be contacted at [privacy@airwallex.com](mailto:privacy@airwallex.com).

#### **For customers of Airwallex United States and resident in Texas**

If you are resident in Texas and have a complaint about our services, first contact Airwallex customer support at 855-932-3331.

If you still have an unresolved complaint regarding the company's money transmission or currency exchange activity, please direct your complaint to the Texas Department of Banking at 2601 North Lamar Blvd, Austin, TX 78705, 1-877-276-5554 (toll-free), [www.dob.texas.gov](http://www.dob.texas.gov). 33.51(d)(1)(B)