

SENDWAVE WALLET PRIVACY NOTICE

Effective: January 2026

INTRODUCTION

Your privacy and the security of your personal information are extremely important to us. At Sendwave Costa Rica S.R.L., we are committed to protecting and respecting your privacy and handling your information in an open and transparent manner.

This Privacy Notice ("**Policy**") explains, among other things: what we do with your personal information; what we do to keep it secure; with whom we share your information; your rights in relation to the personal information we hold about you; and who you can contact for more information. This Policy supplements our **Global Privacy Notice (Global Notice)**. In this Policy, references to "**You**" and "**Your**" refer to users of our Mobile Apps and consumers.

We will regularly amend or update this Policy to reflect changes in our practices for processing personal information or in applicable law. We encourage you to read this Policy carefully and to regularly check this page. We will notify you if any changes are made to its terms.

Sendwave Costa Rica S.R.L. ("**ZEPZ**", "**we**", "**us**", "**our**") is an international payment service that provides international money transfers, Sendwave Wallet, and remittance services. Sendwave Costa Rica is a subsidiary of WorldRemit Limited (registered in the United Kingdom and regulated by the Financial Conduct Authority). Our **registered office is at Building 751, 7th Street between 7th and 9th Avenues, San José, Costa Rica.**

Sendwave Costa Rica is part of the **WorldRemit Group**. For a list of companies in the WorldRemit Group, [CLICK HERE](#)

You will know us by our brands: "**WorldRemit**" and "**Sendwave**".

ACCEPTANCE OF THIS PRIVACY NOTICE

By checking the box, you confirm your acceptance of this Privacy Notice, which is necessary to complete the process and become a Registered User. Please read this Privacy Notice carefully before selecting the box.

REVOCAION OF CONSENT

The data we collected is suitable and not excessive given the scope, purposes, and services offered by ZEPZ to the Registered User. If you have provided consent to process your data, you can revoke it at any time by contacting us at dataprivacy@zepz.io.

CONSEQUENCES OF NOT PROVIDING THE DATA

If you do not provide the required data or deny consent to its use at any time, ZEPZ will be unable to offer you the various services available to Registered Users of the App. This includes restricting access to your Registered User account.

ACCURACY OF THE PROVIDED INFORMATION

You state that you are the one who claims to be you and who knows the legal consequences with which Costa Rican legislation punishes acting by posing as someone else, and that the information that is entered in the App is accurate, and that assumes the duty to comply with the necessary information updates to keep it clear and accurate at all times. In the event of non-compliance with this obligation to update, you exempt ZEPZ from any legal consequences arising from these elements of authenticity and accuracy, in accordance with the principle of information quality established in national legislation.

DEFINITIONS

Database: Set of personal data of the Registered Users, duly organised and used for the purposes that ZEPZ informs you in this Privacy Notice as required by applicable Data Protection Legislation.

Data Protection Legislation means data protection law in Costa Rica, regulated by the Law on the Protection of Persons Regarding the Processing of their Personal Data No. 8968 of July 7, 2011 and the Executive Decree No. 37554-JP of October 30, 2012, Regulating Law No. 8968.

Mobile App- Sendwave Wallet

Registered Users- customer/user of Sendwave Wallet

PURPOSE OF DATA COLLECTION

Our primary purpose in collecting user information is to provide You with a safe, smooth, efficient, and customised experience and to provide the services You have requested from us. We may also use the information that You have provided to ensure that the content on our site is presented in the most effective manner for You and Your computer or device.

We use Your information for the following specific purposes:

- to carry out our obligations arising from any contracts entered into between You and us or from applicable law such as anti-money laundering laws, and to provide You with the Services in accordance with our terms and conditions and terms and conditions with this Policy;
- to register Your account;
- to fulfil Your Transaction / (Airtime Top Up) Request;
- to send You confirmations or other notifications;

- to notify You about temporary or permanent changes to our services or other service-related messages;
- to assist you where online applications are not completed;
- to prevent fraud, money laundering, and any other illegal activity;
- to ensure that content from our site is presented in the most effective manner for You and for Your computer;
- to promote our business;
- to send You Marketing communications, provided that You have given us Your contact details and that you do not decide to opt out from this type of communication, in accordance with Data Protection Legislation;
- to administer our site and for internal operations, including troubleshooting, data analysis, profiling and segmentation analysis, testing, research, statistical and survey purposes;
- as part of our efforts to keep our site, Mobile App and our services safe and secure;
- Analytics, web traffic analysis, to measure or understand the effectiveness of advertising we serve to You and others, and to deliver relevant advertising to You;
- Online Behavioral Advertising (to learn more about ad choices, or to opt out of interest-based advertising);
- to make suggestions and recommendations to You and other users of our site about services that may interest You or them;
- to train, monitor and assess the effectiveness of the manner in which we provide the Services to You;
- to consider and investigate any concerns or complaints you may have; and
- to display personal testimonials of satisfied consumers on our website in addition to other endorsements.

WHAT DATA WE COLLECT

We may collect, record and use information about You in physical and electronic form and will hold, use and otherwise process this data in accordance with applicable Data Protection Legislation and as set out in this Policy.

The personal information we collect and use may include, amongst other things:

- Your full name;
- Your contact information, such as Your email address, postal address and telephone number or any telephone number used to call us;
- Your demographic information such as age, education, gender, and interests;

- Evidence of Your identity (for example passport information, national identification number, and driver's license);
- The reason for your transfer request;
- We may hold information about you which includes sensitive or special categories personal data, such as biometric information (for example: facial recognition, or Your image in photo or video form). We may use your biometric information to help identify you when you open account to verify your identity during onboarding as part of our Know-Your-Customer (KYC) checks or to authenticate you as an authorised user to operate an account or to comply with our AML obligations, fraud detection and prevention; Unique identifiers such as Your username, account number and password;
- Your profiles and postings on any other social media applications and services that we provide or that You make available to us;
- Your payment details and other financial data (for example, Your bank, payment card, or payment method provider's name and Your account number and sort code) and salary details;
- Information about Your visit to our website, including the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page;
- Your profiles and postings on any other social media applications and services that we provide or that You make available to us; and
- We also collect from You information in relation to other people (for example, details of the recipients of Your money transfers), where You provide us with such information. In providing this information you confirm to us that you have obtained all necessary permissions from them to the reasonable use of their information for the purposes and in the manner described in this Notice, or are otherwise permitted to give us this information on their behalf. Please also ensure that those other people are aware of this notice and that the provisions of this notice are clearly communicated to them.

COLLECTION OF OTHER INFORMATION

- Like most websites, we use "cookies, SDKs, and similar technologies to help us make our site – and the way You use it – better. Cookies mean that a website will remember You. They are small text files that websites transfer to Your computer (or phone/tablet). They improve website use and speed – for example, by automatically filling Your name and address in text fields;



- **Log Files.** In addition, with regard to each of Your visits to our site, we will automatically collect certain information (for example, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data). We may combine this automatically collected log information with other information we collect about You;
- **Social Media Widgets.** Our website includes Social Media Widgets or Features, such as but not limited to, the Facebook Like button and Twitter button, which are interactive mini-programs that run on our site to provide specific services from another company (e.g., displaying news, opinions, music, etc.). Personal information, such as Your email address, may be collected through the Widget. Cookies may also be set by the Widget to enable it to function properly. Information collected by this Widget is governed by the privacy policy of the company that created it;
- **Mobile App.** When You download our Mobile App, in addition to the information mentioned above we: automatically collect information on the type of device You use, operating system version, and system and performance information. We may send You push notifications from time-to-time in order to update You about events or promotions that we may be running. If You no longer wish to receive these types of communications, You may turn them off at the device level. To ensure You receive proper notifications, we will need to collect certain information about Your device such as operating system and user identification information;
- We may collect Your geolocation information derived from your device, only when the geolocation setting is enabled on your device. When Your geo-location is activated, your geolocation data may be shared according to the section titled “Recipients of your data” described in this Privacy Notice ; and
- We may use mobile analytics software to allow us to better understand the functionality of our Mobile Software on Your device. This software may record information such as how often You use the Mobile App, the events that occur within it, aggregated usage, performance data, and where the Mobile App was downloaded from.

RECIPIENTS OF YOUR DATA

Your personal information is very important to us. However, there are circumstances where it is necessary for us to share your information for business purposes (including operating our site and our Mobile App, and providing services to You), in accordance with applicable law and subject to applicable professional and regulatory requirements regarding confidentiality and professional secrecy.

In addition, we may disclose your personal information to:

- **Our affiliates:** we share your information with our affiliates and other companies within the WorldRemit group of companies;
- **for our internal business, operational,** management and service needs;
- for **compliance, regulatory and audit activity** and in connection with legal, regulatory and tax claims and investigations;
- **to understand and support our consumers** and other individuals who use our services, apps and visit our sites;
- **to send Marketing communications** to You, where You have shown interest and You have not opted out from receiving marketing communications; and
- **Third party processors** which include people with whom we do business or who provides services to us. If we engage a third party processor to process your information, the Processor will be subject to binding contractual obligations to: only use the personal information in accordance with our prior written instructions; and use measures to protect the confidentiality and security of the personal information, together with any additional requirements. We may disclose data to provide our services, to respond to legal requirements, enforce our policies, liaise with judicial or regulatory authorities where required under applicable law, and protect our rights and property. Processors may include:
 - **Credit reference agencies** or other service providers to verify Your identity or the identity of recipients of the money transferred through our services or for any other purpose related to providing our services;
 - **Professional advisers,** such as our auditors and lawyers;
 - **Companies that capture or analyse information** to help us understand how our services, sites and Mobile Apps are used and perform or to tailor our services and promotions, including for the purpose of allowing us to improve the services we provide;
 - **Companies that provide us with marketing assistance,** including: the management of email marketing operations, SMS and other services that deploy marketing on the internet or social media platforms; the running of surveys and other feedback activity; as analysis of the effectiveness of any marketing or consumer engagement we do;
 - **Banks, payment card processors** and other service providers that process bank transfers, credit and debit card payments or otherwise provide financial infrastructure services to enable us to provide our services;
 - **Our service providers,** including those who provide data hosting services, fraud prevention services; technology services, and

technology tools that allow us to monitor, test and improve our services, sites and Mobile Apps;

- **Companies that we have instructed to provide services** to or for us for those purposes that may be reasonably ascertained from the circumstances in which the information was submitted;
- **Other business entities** should we plan to merge with, or be acquired by, or be invested in by that business entity, or if we undergo a corporate reorganisation; and any successor in business to us;
- **Facebook** - We may share with Facebook, actions that You take on our website such as Your visits to our website, Your interactions on our website, use of Facebook Connect and information collected from cookies or similar technologies including Facebook Pixel. This allows us to measure the effectiveness of our advertising, improve our marketing practices, and helps us deliver more relevant advertising to You and people like You (including on social media such as Facebook). Further information, including how Facebook enables You to exercise Your data protection rights, and opt out of seeing online interest-based ads can be found in Facebook Data Policy If you would like to know more please contact us using the details below;
- **Google** We use Google Analytics, which uses cookies and similar technologies to collect and analyze information about use of the Sites and report on activities and trends. This service may also collect information regarding the use of other websites, apps, and online services. You can learn about Google's practices by going to google.com/policies/privacy/partners. To opt out of being tracked Google Analytics across all websites visit tools.google.com/dlpage/gaoptout;
- **Fraud Prevention Agencies** - Where we have a good reason to suspect fraud, money laundering, counter terrorist financing or any other illegal activity we can, upon request or where legally obliged, share your personal information with crime prevention agencies and other third parties for the purpose of detecting, preventing, or reporting crime, or for actual or suspected breach of any applicable law or regulation. These third parties may include business partners and companies that provide services to us, law enforcement bodies, regulatory and supervisory authorities, and providers of fraud prevention and detection services. Please note, we may suspend activity on your account or any transaction, refuse access to your account or cancel any transaction you may want to make, if we think there is a risk of any illegal activity;
- **Public Agencies** - We release accounts or other personal information when we consider it appropriate to comply with the law, to enforce our

Terms and Conditions and any other agreement, to protect the rights, property, or safety of ZEPZ, our employees, consumers, our business partners, and the public. In these circumstances, we will only provide them with the information they require to perform their function;

- **Research companies** - We may share personal information in a secure way to allow research companies and feedback providers to contact you directly on our behalf to get your opinions on or refuse to take part in the research or surveys.

HOW LONG DO WE RETAIN YOUR DATA?

We take every reasonable step to ensure that Your personal information is only retained for as long as it is required for the purposes set out in this Policy. Therefore, we will only keep the information we collect about You for as long as required for the purposes set out above, or as required to comply with any legal or regulatory obligations to which we are subject. This will involve us regularly reviewing our files to check that information is accurate, up-to-date and still required.

The period for which we will retain information about You will vary depending on the type of information and the purposes for which we will use it. Generally, unless applicable law or our legal and regulatory obligations require a longer retention period, we will retain your records for at least 6 years after You terminate Your relationship with us.

DATA SECURITY

We have implemented appropriate technical and organisational security measures designed to protect your personal information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law.

Unfortunately, the transmission of information via the internet (including by email) is not completely secure. Although we will do our best to protect Your personal information, we cannot guarantee the security of Your data transmitted to our site, and any transmission is at Your own risk. Once we have received Your information, we will use strict procedures and security features to try to prevent unauthorised access.

INTERNATIONAL DATA TRANSFERS

International transfer of Your personal information

Due to the international nature of our business, we may need to transfer Your personal information to other WorldRemit group companies, to other third parties as noted in the "Recipients of your data" section of this policy, and recipients, in connection with the purposes set out in this Policy. For this reason, we may transfer your personal information to other countries that

may have different laws and data protection compliance requirements to those that apply in the country in which you are located. By accepting this Privacy Policy, You provide Your express and valid consent for such international transfers of Your personal data.

DIRECT MARKETING

We may ask for Your consent to send You marketing communications about products or services offered by Sendwave and other companies in the WorldRemit Group.

RIGHT TO OPT OUT OF DIRECT MARKETING

You can opt out of receiving marketing communications by clicking on the unsubscribe link or following the opt-out message included in the communication, or simply send an email to dataprivacy@zepz.io with “*URGENT - UNSUBSCRIBE REQUEST*” in the subject line and the email address that you wish to be removed from our marketing Database.

Please note that if you request that we stop sending you marketing messages or unsubscribe, we may continue to send you service and administrative communications, such as transfer updates and other important information about your transaction.

YOUR RIGHTS AND RESPONSIBLE PARTY OF THE DATABASE

You may request the rights of access, rectification, revocation or elimination of the processing of your personal data by contacting us at dataprivacy@zepz.io. Please refer to the section titled 'Your Rights' in our Global Privacy Notice for a comprehensive description of all your privacy rights. According to Data Legislation, the exercise of Your rights will be processed free of charge and we will endeavour to respond within a reasonable period and in any event within five business days, in compliance with Data Protection Legislation.

For purposes of Data Protection Legislation, Sendwave Costa Rica is the Responsible Party of the Database (Data Controller) and the address and contact of the Data Controller is in the section titled “CONTACT US” of this Policy.

CONTACT US

Questions, comments and requests regarding your personal information and our Policy are welcome and should be sent to dataprivacy@zepz.io or you can send it by post addressed to **Sendwave Costa Rica S.R.L., Building 751, 7th Street between 7th and 9th Avenues, San José, Costa Rica.**



If you believe that there has been a breach of the Data Protection Legislation or elements of this Policy, or if you have any concerns about ZEPZ's handling of your personal information, please contact us. If you are not satisfied with our response, you can also refer your complaint to the **Costa Rican Agency for the Protection of the Inhabitants' Data (PRODHAB)** at:

Post: San Pedro de Montes de Oca, Mall San Pedro, Ofimall Executive Center, 6th floor.

Email: info@prodhab.go.cr

Phone: (506) 2234-0189

Website: <http://prodhab.go.cr/>