

# 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 making financial services accessible to people everywhere. 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 financial services, such as our digital wallet or prepaid card; contact us; access or register an account on 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:

- Your personal information and identifiers: 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 it), place of birth, date of birth, gender, citizenship, occupation, marital status, and government or national identification numbers and accompanying documentation;
- Your financial and transactional information: Financial and transactional information such as your money transfers, payments, deposits and the source/destination of funds for each, information about how you use our Services, bank and credit information, and employer information;
- Recipient personal 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;
- Your technical information: 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.”;
- Your sensitive personal information: Sensitive or special categories of information, such as biometric information used to uniquely identify you (for example, fingerprints or facial recognition) or criminal conviction information. We will only hold this data when we need to for the purposes of the Services which 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;
- Your information from third party sites or services: 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 relevant third party 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, including:

- Information that you give to us in person, online or through our mobile app including through transaction forms, registrations for our financial services or loyalty programs, interactions with Western Union agents and business partners;
- Information that you provide to us while we provide customer support or consultation, including using email, postal mail, call centers, online chatbots, or live chat;
- Information that others may provide about you through the use of our Services;
- Information that we learn about you through the use of our Services;
- Information about you that is acquired through automated means, such as communications protocols, email communications, and cookies or similar INTERNET TECHNOLOGIES;
- Information about you that is acquired through our vendors, fraud risk management companies, law enforcement bodies, commercial and public data sources, and other lawful third-party data sources which we may use to augment our customer information;
- Information about you that is acquired through your use of social media; and
- Information about you that is acquired through your interest in advertisements placed by or about Western Union on our own or 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. We use these technologies for a variety of purposes, which are 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, unless required by applicable law.

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

We use the personal information we collect for the following commercial purposes.:

- **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 digital wallet or bank account, to link to your loyalty program information or to any transactions that you made before you created your digital wallet or bank account). Failure to provide necessary personal information may affect our ability to provide our Services to you;
- **Communication:** To contact you with information relevant to the Services that you use or the loyalty programs that you participate in, to answer questions or respond to other requests that you send to our customer service teams or to market and advertise 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 Western Union and non-Western Union websites and applications;
- **Providing advertising and marketing services for advertising partners, including targeted advertising**
- **To train artificial intelligence technologies which are utilized for customer care, customer onboarding and the prevention of fraud or other unlawful activity;**
- **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 digital wallet and banking services, conducting money transfers, financial 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 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 also include using your information to conduct market research surveys, as well as marketing and advertising based on your use of our Services and your interests. 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 processing biometric data, for enabling your bank or digital wallet account 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 which you request or when required by law. In certain cases, such as performing money transfer and banking or digital wallet account 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 or other products and services that may be of interest to you. These may include offers by email, telephone, postal mail, SMS, social media, and other communication or digital channels.

You can opt out of receiving direct marketing communications at any time. If you no longer want to receive direct marketing-related communications from us, you may opt out by following the instructions in the relevant electronic communication, by adjusting your settings in your digital bank or wallet account or app, 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 important service, administrative, or transaction-related communications to you.

## **INFORMATION FROM CHILDREN**

We do not direct our Services or products towards children under the age of 18. We do not knowingly collect information from our 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”;
- 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; and
- 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 bank or wallet account customer, other bank or wallet account customers may also be 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 your personal information 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 in which 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. 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 or UK Information Commissioner’s Office (ICO) have not found to provide adequate protection will be protected by appropriate [Standard Contractual Clauses](#) or other EU or UK –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**

<b>Right</b>	<b>Description</b>	<b>How to exercise</b>
Right to know and access	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.	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. To exercise these rights, please visit <a href="http://www.westernunion.com/datasubjectrights">http://www.westernunion.com/datasubjectrights</a> or contact Western Union through the section titled "CONTACTING US".
Right to stop marketing communications	You have the right to stop us from sending you marketing communications.	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. To exercise these rights, please visit <a href="http://www.westernunion.com/datasubjectrights">http://www.westernunion.com/datasubjectrights</a> or contact Western Union through the section titled "CONTACTING US".
Right to correction	You have the right to ask us to correct information about you that is incomplete, inaccurate or out-of-date.	To exercise these rights, please visit <a href="http://www.westernunion.com/datasubjectrights">http://www.westernunion.com/datasubjectrights</a> or contact Western Union through the section titled "CONTACTING US".
Right to deletion, restriction, and objection	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 exercise these rights, please visit <a href="http://www.westernunion.com/datasubjectrights">http://www.westernunion.com/datasubjectrights</a> or contact Western Union through the section titled "CONTACTING US".
Right to withdraw consent	To the extent we are processing personal information based on your consent, you may withdraw your consent as permitted by applicable law.	To exercise these rights, please visit <a href="http://www.westernunion.com/datasubjectrights">http://www.westernunion.com/datasubjectrights</a> or contact Western Union through the section titled "CONTACTING US".
Right to lodge a complaint	You also have the right to lodge a complaint with a relevant data protection regulator or supervisory authority about our processing of personal information.	To exercise these rights, please visit <a href="http://www.westernunion.com/datasubjectrights">http://www.westernunion.com/datasubjectrights</a> or contact Western Union through the section titled "CONTACTING US".

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 may modify this Global Privacy Statement from time to time, and updated privacy statements will be posted on this Website when amendments occur. We encourage 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, please see the [Mexican Resident Addendum](#) to this Global Privacy Statement.

## **BRAZILIAN CITIZEN PRIVACY NOTICE**

For consumers in Brazil, please 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:

<https://www.westernunion.com/global/en/privacy-statement-entities.html>