

# Privacy Policy

Version 2.6 (December 2024)

We are Atlantic Money (“we”, “us”, or “our”). The legal entity responsible for controlling your data depends on where you live:

Where you live	Data controller	Further information
European Economic Area (EEA)	Atlantic Money NV	Our registration number with the Belgian Crossroads Bank for Enterprises is 0783.476.423
United Kingdom (UK)	Atlantic Money Ltd	Our registration number with the UK’s ICO is ZA877805
Other	Atlantic Money Ltd	

Atlantic Money is committed to protecting and respecting your privacy. You also play an important role in protecting your personal data. Please protect your login credentials and do not share them with others. We also recommend that you don’t reuse the same password for different purposes. If we receive instructions using your login information, we consider that you authorised the instructions. You agree to notify us immediately of any unauthorised use of your account or you have reason to believe that your interaction with us is no longer secure.

## General

Please read this privacy policy carefully as it sets out how we use your data in the operation of our website and mobile application.

Our Services consist of:

- Currency conversion; and
- Money transfer payment services.

Our privacy policy covers:

- Visitors to our website (“guests”);
- Members of our waitlist (“waitlist members”);
- Our customers who register for and use our Services; and
- Recipients, who receive payments from our customers when they use our Services.

Our customers must be either:

- Individuals residing in the United Kingdom or in the European Economic Area; or
- Legal entities incorporated in the United Kingdom or in the European Economic Area.

We may change this privacy policy from time to time by updating this document, and where appropriate we will notify you of this by email. The current version of our privacy policy will always be available from our website or by contacting us directly.

## What personal data do we hold?

### Guests

You can browse our website as a guest without giving us any information, and we won't know who you are. However, even if you are a guest, please bear in mind that we may:

- Record the areas of our website which you visit and at what times;
- Record information about your activities in using our website; and
- Collect information about your computer or device, such as which browser you are using, your network location, operating system, IP address, the type of connection you are using (e.g. broadband) and the URL which led you to our website.

We collect the information above by using cookies. You can find further details on the cookies we use on our website, why we use them and how you can control them in our [cookie policy](#).

### Waitlist members

If you join our waitlist, in addition to the information we collect from you as a guest on our website, we also retain your email address and any answers you provide while participating in surveys.

### Customers

If you open an Atlantic Money account using our mobile application and use our Services, or you are an authorised user, director, or ultimate beneficial owner of a legal entity that opens an Atlantic Money account, the information we hold about you may include:

- Personal details like your name and date of birth;
- Contact details like your email address and phone number;
- Information about your identity, such as a copy of your government-issued identification document and biometric data, specifically photos of your face that you have uploaded using our mobile application;
- Transaction and financial data like your bank account details, reasons for making transfers, recipient data and documents you upload in support of a transfer;
- Usage data about how you use our website, mobile application and Services; and
- Technical data including your IP address, browser type and version, time zone setting and location, browser plugin types and versions, operating system and platform, and other technology on the devices you use to access this website.

We may hold any additional information you share with us through customer support channels, such as phone calls and email tickets.

## Recipients

If our customer sends you money using our mobile application, we hold the information provided by the customer to identify you and process their transfer.

## Job candidates

By applying for a role with Atlantic Money, you give us personal data about yourself. We will use such personal data only for the purpose of assessing your suitability for employment by us and in any subsequent interview process. Copies of the information you submit and any further correspondence will be retained in order to progress your job application and for our records.

Your application will be processed by our HR team based in the UK and EEA. The information you provide to us as an applicant is supplied in strict confidence and your personal data will be inputted to our HR system for internal recruitment purposes only. Only employees of Atlantic Money who are part of the recruitment and selection processes will have access to this information.

We retain personal data only for as long as we need to process your job application. We may also retain your details for the consideration of future vacancies, or in accordance with our legal obligations.

## If you fail to provide personal data

Where we need to process personal data by law, or under the terms of a contract we have together, and you fail to provide that data when requested, we may not be able to provide you with Services. We may also have to close your Atlantic Money account. We will notify you if this is the case at the time.

## How do we use the personal data we hold?

Atlantic Money will only use your personal data if we have a legal basis (or more than one) for doing so.

Generally, we do not rely on consent as a legal basis for processing your personal data (although we may need your consent before sending direct marketing communications to you via email or text message). Where you provide consent, you can withdraw your consent at any time and free of charge, but without affecting the lawfulness of processing based on consent before its withdrawal. You can update your details or change your marketing preferences by contacting us using the details below.

The purpose for which we use and process your information and the legal basis on which we carry out each type of processing in the UK and in the EEA is explained below:

Processing purpose	Legal basis for the processing
To provide you with information that you request from us and to respond to customer	It is in our legitimate interest to respond to your queries and provide you with any

support queries.	information you request. To ensure we offer a great service, we consider this to be proportionate and not detrimental to you.
To send you information and updates about Atlantic Money and our Services via email.	It is in our legitimate interest to market our Services to you and promote new features and products. You can opt out at any time.
To fulfil the terms of a contract we have together, for example to enable you to open an account and transfer money through our mobile application.	It is necessary for us to process your personal data to fulfil our contractual obligations to you.
To comply with our legal and regulatory obligations or to perform a task carried out in the public interest, for example to help prevent financial crime.	It is necessary to comply with our legal and regulatory obligations.
To carry out product development, marketing analysis and market research in order to improve our Services.	It is in our legitimate interest to continually improve our Services. We consider this to be proportionate and not detrimental to you.
To send you information regarding changes to our policies, customer agreement or other administrative notices related to our Services.	It is in our legitimate interest to ensure that any changes to our policies and other terms are communicated to you. We consider this to be proportionate and not detrimental to you.

## Special categories of personal data

We may process a limited amount of sensitive data when attempting to verify your identity. Biometric data is required to be processed when we compare images of your face with images of your identity document(s). We process this data on the basis that we deem it to be in the substantial public interest, specifically for the reason of fraud prevention and financial crime compliance. It is necessary for us to process this data in order to fulfil our contractual obligations to you.

## Who do we share your information with?

Atlantic Money may disclose your personal data to:

- Our staff, so that they can do their job;
- Companies and organisations which provide us with services like banking and payments, legal and accounting, identity verification, cloud hosting and storage, business and functional analytics, advertising, communications and fraud prevention;
- Credit reference agencies, so that we can verify your identity;
- Law enforcement agencies and other external parties, for example to help prevent financial crime; and

- Other Atlantic Money group companies.

We may also share your details with people or companies if Atlantic Money becomes involved in a corporate restructuring, merger, acquisition or takeover.

Which third parties we disclose your personal data to depends on a number of factors like how you use our Services. Please contact us using the details below if you would like to know more.

## International Transfers

We may transfer and store the data we hold to companies, staff members and organisations outside of your jurisdiction. When we do this, we make sure that your data is protected and that:

- the European Commission says the country or organisation has adequate data protection; or
- We've agreed standard data protection clauses approved by the European Commission with the organisation.

If you would like further information on the specific mechanism used by us when transferring your personal information outside of your jurisdiction, please contact us using the details below.

## Email marketing

We would like to provide you with information about our new products, services, newsletters and other information which we think you may find interesting. As mentioned above, we will often do this on the basis of our legitimate interest. You will always have the right to opt out of receiving email marketing communications from us at any time by contacting us using the details below or using the "unsubscribe" link in emails.

## Your rights

Subject to some country-specific variations, you have the right to:

- Access or receive a copy of the personal data we hold about you;
- Have us update the personal data we hold about you;
- Ask us to delete your data (although for legal reasons we might not always be able to do it);
- Opt out of direct marketing and in certain other 'legitimate interest' circumstances;
- Withdraw any consent you've given us; and
- Ask us to review an automated decision.

You can do any of these things by contacting us using the details below.

## Data retention

We keep most of our customer data for a certain period after an Atlantic Money account is closed. This is in order to comply with our legal and regulatory obligations. The retention period will generally be 5 years for UK residents and 10 years for EEA residents. In some circumstances we may

be required to keep it for longer. In order to decide how long to keep other types and categories of data, we consider why we hold it, how sensitive it is, how long the law says we are required to keep it for, and what the risks of keeping it are.

## Complaints

If you have any questions or complaints regarding our privacy policy, please contact us using the details below. If you feel that we have not addressed your questions or concerns adequately, you may refer your complaint to:

- For UK residents: the Information Commissioner's Office (ICO)
- For EEA residents: the Data Protection Authority in Belgium (DPA)

## Contacting Us

If you have any questions about your personal data or this privacy policy, please contact us:

- By email: Atlantic Money, [compliance@atlantic.money](mailto:compliance@atlantic.money)
- By post:
  - For UK residents: Atlantic Money Ltd, Spaces, 30 Moorgate, London EC2R 6DN United Kingdom
  - For EEA residents: Atlantic Money NV, Spaces, De Kleetlaan 4, 1831 Machelen-Diegem, Belgium