

XPRESS MONEY SERVICES LIMITED

DATA PRIVACY STATEMENT

1. Introduction: Xpress Money as Data Controller

Xpress Money Services Limited (herein referred to as “XMSL” or “we” or “us” or “our”), is duly incorporated under the laws of Abu Dhabi Global Market (ADGM) with registered number 000001113 and regulated by the ADGM Financial Services Regulatory Authority with Financial Services Permission Number 170033, having its registered office at Unit 209-210, 11 Floor, Al Sarab Tower, Abu Dhabi Global Market Square, Al Maryah Island, Abu Dhabi, United Arab Emirates. XMSL provides money remittance services through a network of clients, including some of the largest banks and non-banking financial companies. These “clients” are independent entities from XMSL who offers, along with other services, money remittance services.

2. Purpose of this Privacy Statement

This document outlines XMSL’s approach to Data Privacy to fulfil our obligations under the ADGM Data Protection Regulations 2021. The purpose of this Privacy Statement is to reassure you of the importance we place on keeping your personal information secure and explain how we collect, use, store, protect, disclose, and share your personal information when you use any of our services.

We encourage you (i.e., “Data Subjects”) to review this Privacy Statement and become familiar with it if you use any of our services or provide us with any of your personal information.

3. Personal Data processed by XMSL

When you use our money remittance services through our network of clients; contact us directly; or access our websites or applications, we (or our clients offering the money remittance service) may collect personal information about you (“Personal Data”) and may use it along with other information collected or generated during our relationship with you. We collect different types of Personal Data relating to you, which may include:

3.1 Identification and contact details

Full name; photograph; address; nationality; telephone no.; relationship between sender and recipient of the transaction; E-mail; date of birth; gender; birth place; identification document (e.g., national ID, driving license, passport) and the data contained there; occupation, marital status.

3.2 Financial and other details

Origin of the financial resources; financial background; bank statements; transaction amounts; bank account numbers; credit / debit card numbers; marketing & other contact preferences.

3.3 Information you provide us about others or others provide us about you

- I. 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 our services.
- II. Before you share information with us about another person, you should be sure that you have their permission to do so. You should also share with them this Privacy Statement. You need

to ensure they confirm that they know you are sharing their personal information with us for the purposes described in this Privacy Statement.

- III. As a financial institution and in connection with identity verification, fraud prevention and similar security purposes, XMSL may confirm some of the Personal Data elements it or its clients collect from you through third parties' sources such as government agencies and consumer reporting agencies.

3.4 Technical information

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. At its websites, XMSL collects Personal Data and aggregate information that Data Subjects voluntarily provide there, or by the implementation of cookies. For more information on how we use and manage cookies, please refer to our Cookie Policy.

3.5 Screening of Personal Data using various sanction lists

To comply with applicable regulations, XMSL performs regular screening against applicable sanctions lists of its client, consumer databases, parties to any transactions, beneficial owners, employees, persons, and organizations with which XMSL has a direct or indirect relationship. This screening is done on a real-time basis using an AML solution which is integrated with XM's core transaction processing system.

4. How XMSL collects personal data

XMSL collects your Personal Data in several ways:

- i. To provide the remittance services requested by sender or receiver, XMSL collects Personal Data through its network of clients:
- ii. At its websites, XMSL collects Personal Data and aggregate information that Data Subjects voluntarily provide there, or by the implementation of cookies.
- iii. Third Party Marketing Cookies and Social Advertising - XMSL has relationships with online advertisers and social media networks. These partners use cookies and similar technologies for marketing purposes and may serve you with targeted advertising about XMSL services while you are on their website or mobile applications, at our request and only with your consent. You can choose to decline the Third-Party Cookies that enable this type of marketing at any time by not accepting the cookies when visiting XMSL websites. We encourage you to learn more about how companies use advertising on social media and how to adjust your marketing preferences by checking their privacy statement and opt-out options.
- iv. Personal Data collected by XMSL through social media - In addition to the above, XMSL may process Personal Data derived from Data Subjects' social media resources like: Facebook, Twitter, YouTube, LinkedIn, Instagram, Google+, Pinterest, Weibo and WeChat, as the information Data Subjects choose to make available. Information you provide to us while we provide Data Subjects with support or consultation, including using email, postal mail, call centers, or live chat;

- v. Through our vendors, fraud risk management companies, law enforcement bodies, commercial and public data sources;

5. Legal basis to process Personal Data

Personal Data will be processed by XMSL only if and to the extent that at least one of the following applies:

Compliance with Legal Obligations

XMSL may process Data Subjects' Personal Data, when it is necessary for the compliance with a legal obligation, e.g., Anti-Money Laundering screening and reporting activities, to protect XMSL rights and to comply with court order or judicial proceedings.

Legitimate Interests

XMSL may process Data Subject's Personal Data when there is a weighed and balanced legitimate interest where the processing is needed, and such interest is not overridden by the rights of others, including the Data Subjects. e.g., to provide the service required, internal documentation, contact the Data Subjects in relation to the transaction or for customer care initiatives and fraud prevention.

Consent

In certain scenarios, XMSL will process Personal Data from Data Subjects only after they have provided their consent for that specific purpose. For example, before sending direct marketing materials to Data Subjects and/or potential customers XMSL must obtain their consent.

The Data Subjects can withdraw consent at any time and the lawfulness of any processing based on Consent prior to that withdrawal will not be affected by the subsequent withdrawal of consent.

Contract

XMSL will process Personal Data of Data Subjects to comply with its contractual obligations. For example: XMSL will transfer Personal Data from Data Subjects to third parties in order to provide the service required by Data Subjects, this in alignment with the terms and conditions of such service.

6. Purpose of Data Processing:

XMSL generally uses Personal Data from Data Subjects for the purpose of providing them a service. This may include the following:

- i. Authorising and processing Data Subjects' transactions, including effecting and administering money remittances and ensuring proper payment to the designated recipient of funds.
- ii. Monitoring and improving our services including websites/mobile apps and its content.
- iii. Sending information about XMSL products and services.
- iv. Customer care initiatives to improve XMSL services.
- v. Meeting legal, regulatory, self-regulatory, risk management, fraud prevention and security requirements, which may include (among other measures) verifying the identity of the sender and recipient of funds and checking identities against money laundering, terrorist financing or similar watch lists established by regulatory agencies or similar bodies. For identity verification

purposes, senders and recipients of money transfers may be required to produce valid identification or consent to verification by other means before releasing funds.

- vi. Maintaining business and transaction records for reasonable periods, and generally managing and administering XMSL business.
- vii. Meeting insurance, audit and processing requirements.
- viii. Otherwise with the Data Subjects' consent or as permitted or required by law.

6.1 Automated Processing

XMSL may conduct automated processing of Data Subjects' Personal Data, such as: address, employment information, date of birth and transactions amounts with the sole purpose to comply with anti-money laundering regulations.

7. Personal Data sharing

In alignment with the purposes established in this Privacy Statement, XMSL may disclose Personal Data from its Data Subjects to:

- i. **Data Processors:** XMSL will share Personal Data with third-party service providers, acting on behalf of XMSL (hereinafter "Data Processors") including affiliates of XMSL acting as Data Processors to perform services on XMSL behalf, for example: information technology, data hosting, marketing, customer care, fraud prevention, etc. XMSL takes reasonable measures to ensure that Personal Data that is processed by Data Processors is protected and not used or disclosed for purposes other than as directed by XMSL.
- ii. **Third Party Data Controllers and Joint Controllers:** XMSL will share Personal Data with third parties acting independently from XMSL but only in connection to the services required by the Data Subjects, for example: any clients, any intermediary banks or other financial institutions involved in the transaction of XMSL services.
- iii. **Successors:** if XMSL is purchased by/sold to a third party, in which case personal information of Data Subjects held by XMSL will be transferred. We will notify you of this through the most appropriate means.
- iv. **Relevant Authorities:** XMSL may disclose Data Subjects' Personal Data as necessary to meet legal and regulatory requirements. This may include lawful requirements to disclose Personal Data to government authorities, for example, disclosures in compliance with suspicious activity reporting requirements under anti-terrorism, anti-money laundering and similar laws and regulations.

8. Cross Border Personal Data Transfers

In providing services to the Data Subjects, XMSL may transfer the Personal Data collected to destinations outside of the country where the Personal Data was originally collected, with XMSL affiliates, with third party processors, or with XMSL clients. This is because the Personal Data is processed in those other locations. Where XMSL does so, it will ensure that security measures and appropriate safeguards are put in place to protect the Personal Data and ensure that all transfers comply with applicable data protection law. XMSL also ensures that processing is only ever carried out in accordance with XMSL instructions.

In all cases where XMSL transfers Personal Data across borders, XMSL will rely on acceptable and defined legal mechanisms to ensure that XMSL protects Personal Data at all times. XMSL may use agreements and 'adequacy' protections that have been defined and approved by the relevant Data Protection Authorities.

9. Data Subject's Rights

You (Data Subjects) have certain rights over your Personal Data being processed by XMSL. In summary, the Data Subject rights are:

- i. To be informed: Data Subject's right to know how, why, for how long, on what legal bases his/her Personal Data is processed.
- ii. Access: Data Subject's right to access their Personal Data to know what XMSL process from the and for what's purposes (among other things).
- iii. Rectify: Data Subject's right to correct their Personal Data when this is not accurate.
- iv. Erasure: Data Subject's right to permanently delete their Personal Data after fulfilling certain requirements. The right is not absolute and only applies in certain circumstances.
- v. Restriction of processing. This means that a Data Subject can limit the way that XMSL uses their Personal Data. In such case and if applicable, XMSL will only store the Personal Data to comply with relevant regulation, but it won't be processed for anything else.
- vi. Right to object: In some cases, Data Subject have the right to object to certain processing, for example, if the Data Subject does not want to be contacted by XMSL for marketing purposes.
- vii. Data portability. In certain scenarios Data Subjects may request XMSL to provide a copy of their Personal Data in a digital format or send it to a third party appointed by them.
- viii. Right to lodge a complaint with the Commissioner of Data Protection at the Office of Data Protection.

10. XMSL Contact

For a Data Subject's rights request, and queries or suggestions about this Privacy Statement, XMSL may be contacted at: data.privacy@xpressmoney.tech

Data Protection Officer – Taskeen Ali Khan

11. Solicited/Un-Solicited Communications

XMSL employs a strict policy against sending unsolicited communications. Please note that opting out from marketing communications does not exempt the Data Subject from receiving administrative communications (i.e., Transaction Notifications).

XMSL may contact Data Subjects in response to their inquiries, to provide services at the Data Subjects' request and to manage their requirements.

XMSL websites and emails may contain links to various other websites. While XMSL makes every effort to ensure that its advertisers post clear and complete privacy statements and observe appropriate

data protection practices, each of these websites has a privacy statement that may differ from XMSL one. The privacy practices of other websites and companies are not covered by this Privacy Statement.

12. Security Measures to protect Personal Data

XMSL takes all reasonable steps to ensure that all Personal Data collected/received is treated securely and in accordance with this Privacy Statement and strict data protection standards.

13. Retention of Personal Data

XMSL only retains Personal Data for as long as is necessary for XMSL to use it as described in this Privacy Statement or to comply with XMSL legal and regulatory obligations. When determining the relevant retention periods, XMSL will take into account different factors, including: contractual obligations and rights; legal obligations to retain data for a certain period of time (for example, anti-money laundering laws); statute of limitations under applicable law; potential disputes; guidelines issued by relevant data protection authorities; and XMSL legitimate interests, where we need to consider retaining information to meet any other obligations. Otherwise, XMSL securely erases Personal Data once this is no longer needed.

14. Removal from XMSL Marketing Communications

Data Subjects may want to discontinue receiving marketing information from XMSL. While this may mean that Data Subjects will not receive product or service information of interest to them, XMSL respect Data Subject's wishes not to be informed directly of these promotions or product introductions.

Data Subjects may inform XMSL that they want to opt-out for these communications by exercising their Data Subject rights (as explained in this Privacy Statement) or by opting out through the marketing materials received.

15. Changes to this Privacy Statement

XMSL reviews this Privacy Statement from time to time and may make periodic changes to it in connection with that review. Therefore, Data Subjects should periodically review XMSL website to make sure they are aware of the latest version.