Western Union Business Solutions and our subsidiaries and affiliates (we “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 entities, please see the “LEGAL ENTITIES” section.

**SCOPE OF THIS PRIVACY STATEMENT**

This Privacy Statement describes how we collect, uses, stores, protects, discloses, and shares your personal information or data when you use our Services online through our website, over the phone and through our mobile apps, as well as your choices about the way your information is collected.
PERSONAL INFORMATION WE COLLECT

When you use our services, contact us, access 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:

- Contact information, for example your name, postal address, email address, telephone number, and date of birth;
- Transaction information, including your money transfers and bill payments;
- Business related information that helps us provide our Services to you, such as membership in our loyalty programs, how you use our Services, bank and credit information, employer information and permissions to contact or marketing choices;
- Technical information, including 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, biometric data (e.g., Touch ID/Fingerprint to verify your identity), 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."
- Compliance information, including fraud prevention, identity verification, and sanction checks.

To conduct a money transfer, or use other payment services, you must provide certain information required by us to execute the transfer and to enable us to comply with our legal obligations associated with transferring money. Failure to provide some of your personal information may affect our ability to provide our Services to you. This may include information about the form of identification used to send or receive a transaction (where required by law) including the identification or a copy of the identification document, transaction activity, bank account and payment information.

HOW WE COLLECT PERSONAL INFORMATION

We collect your personal information in several ways:

- Through transaction forms and your interactions with our partners;
- Through online forms, registrations for loyalty and rewards programs or competitions, and other online Services we offer (some of which may be managed by third parties on our behalf);
- While providing customer support or consultation, including using email, postal mail, call centers or live chat;
- Through the process of maintaining and upgrading our Services;
- Through automated means such as communications protocols, email communications and cookies or similar INTERNET TECHNOLOGIES;
- Through your use of social media or other public data sources; and
- Through your interest in our advertisements placed on third party sites.
In addition to the personal information we collect from you, we may also collect your personal information from the person to whom you send and/or receive money, as well as our Agents, vendors, business partners, identity verification companies, payments and fraud risk management companies, law enforcement bodies, and commercial and public data sources.

**HOW WE SECURE YOUR PERSONAL INFORMATION**

We endeavor to use organizational, technical, and administrative safeguards that comply with applicable government laws and regulations to secure your personal information. We also endeavor to restrict information access to our employees, Agents and representatives that need to know it. Despite our efforts, and as you probably know, third parties may unlawfully intercept or access transmissions sent to us or may wrongly instruct you to disclose personal information to them while posing as us.

Please contact us immediately in accordance with the “CONTACTING US” section, if you have reason to believe your personal information held by us may be at risk.

**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 for which we provide online Services for a variety of purposes, including, but not limited to those identified in the section titled “HOW WE USE THE PERSONAL INFORMATION IT COLLECTS”.

We have implemented the capability for the user to manage cookies on our websites. We will only read or write cookies based on your preference level.

For more information on how we uses cookies please visit our website.

**HOW WE USE THE PERSONAL INFORMATION IT COLLECTS**

we utilizes the personal information it collects for the following commercial purposes:

- Performing the Services: To assist us in providing Services to you and help you to receive a personalized experience and assist you in carrying out transactions and accessing account information;
- Authentication: To recognize you and allow you to remain signed-in during your visit 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 us from a banner ad or an Affiliate;
- Advertising: To deliver information specific to your interests on websites and applications for managed or owned by us;
- Analysis of Promotions: To better understand the effectiveness of our promotional campaigns and whether you acted on our promotional messages;
- Fraud Prevention: To promote safety, reduce financial risk and combat fraud across our Services.

**LEGAL 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 legal bases:

- We use your personal information to provide our Services to you: This includes using personal information necessary for conducting money transfers, payment 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 above or for any other products or services.

- We use your personal information for legitimate business purposes: 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 include using your information to conduct market research surveys.

- 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.

- 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 and counter-terrorist financing; 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. This may also include establishing, exercising, or defending our legal rights and claims of 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, 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 you request or is required by law. In certain cases, such as performing money transfer services, we may be unable to provide you with our Services unless you provide certain personal information.

**HOW WE MARKET TO OUR CUSTOMERS**

We will also, subject to your preferences, notify you of offers, promotions and updates regarding our products and Services. These may include offers by email, telephone, postal mail, SMS, social media and other communication or digital channels.

You can opt out of receiving marketing communications at any time. If you no longer want to receive marketing-related communications from us on a going-forward basis, you may opt out by following the instructions in the relevant electronic communication 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 you important service, administrative or transaction-related communications.

**INFORMATION FROM CHILDREN**

We do not direct our Services or products at children under the age of 18. We do not knowingly collect or maintain information from persons under the age of 18.

**EXTERNAL WEBSITES**

Our Website may be linked to or from third party websites. We have not reviewed, does not control, and is not responsible for the content or privacy practices employed by websites that are linked to or from our website. 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 WE SHARE YOUR DATA 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, customer ID number, address, transaction patterns and bank account information to the following types of organizations or parties:

- our group companies and affiliates, including those listed in the section titled “LEGAL ENTITIES”;
- group companies and affiliates owned by Convera Topco Limited;
- Required local remittance licensing entities relevant to a transaction, including those listed in the section titled: “NON-AFFILIATE LOCAL LICENSING ENTITIES”;
- Our Agents or business partners who facilitate the money transfer transaction or specific Services you have requested;
- Vendors, payments processors, banking partners and data processors contracted to provide business and customer services;
- Customer services, based on your consent where applicable, including marketing, advertising and customer satisfaction and market research on our behalf;
- 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.
- 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.

We may transmit personal information we possess 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 our rights and interests or others.

INTERNATIONAL DATA TRANSFERS

We transfer your information to parties in countries outside the country 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 fulfill our legal and compliance obligations which apply to our Services. We also store certain personal information we collect based on your marketing choices in our US data center. By using our Services, you acknowledge that such transfers of information outside of your country of residence may occur.

TRANSFERS FROM THE EEA

Personal information transferred outside the EEA to countries that the European Commission has not found to provide adequate protection will be protected by appropriate contractual clauses or other EU-approved mechanisms, as required by law. You may obtain a copy of these measures by following this link: http://ec.europa.eu/justice/dataprotection/international-transfers/transfer/index_en.html.

RETENTION OF PERSONAL INFORMATION

Your personal information will be retained in accordance with statutory periods contained in regulations applicable to financial transactions 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 it was collected, or to resolve any query you may raise. We will typically keep your information
for no longer than the purpose(s) for which it was obtained, unless we have a legal obligation to keep it for a longer period or retention is advisable for our legal position (for example, regarding applicable statutes of limitations, litigation, or regulatory investigations).

ACCESSING, DELETING AND CORRECTING YOUR PERSONAL INFORMATION AND CHANGING YOUR CHOICES

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. We may charge you a reasonable fee for providing the information, or not act upon your request, if the request is manifestly unfounded or excessive. You have the right to stop us from sending you marketing communications. You have the right to ask us to correct information about you that is incomplete, inaccurate, or out-of-date. 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 the extent we are processing personal information based on your consent, you may withdraw your consent as permitted by applicable law. You also have the right to lodge a complaint with a relevant data protection regulator or supervisory authority about our processing of personal information. When we receive a request, we may ask for additional information from you to verify your identity. In some situations, we may refuse to act or may impose limitations on your rights, as permitted by applicable law. To exercise these rights, please visit our website, or contact us through the section titled “CONTACTING US”. We will endeavor to respond to your request within 30 days but response time may vary depending on the laws and regulations applicable to your request and we may be entitled to extend this period in certain circumstances. We will comply with your request to the extent required by applicable law.

CONTACTING US

If you have a question or complaint about how we handle your personal information, we ask that you put your enquiry in writing. We will investigate your enquiry and generally respond to you in writing within 30 days of receipt. You can also contact us, including our Privacy Team, at privacymatters@convera.com.

To contact us via a toll-free or local phone number, please visit our website for more information.

CHANGES

We reserve the right to modify this Privacy Statement. Updated privacy statements will be posted on this Website when amendments occur. We urge you to review this Privacy Statement when you visit to obtain the most current statement.

USA CONSUMERS (INCLUDING CALIFORNIA RESIDENTS) PRIVACY NOTICE

For California residents, please see the below California Resident Addendum to this Privacy Statement.
CALIFORNIA RESIDENT ADDENDUM TO OUR GLOBAL PRIVACY STATEMENT

We care about the privacy of our Californian consumers and are committed to collecting, using, storing, protecting, disclosing, and sharing your personal information in accordance with the California Consumer Privacy Act of 2018 (“CCPA”). This California Resident Addendum to the Global Privacy Statement (“Addendum”) is applicable to residents of California and, in conjunction with the Privacy Statement, is intended to address the requirements of the CCPA.

When you use our Services, we collect personal information about you as permitted by applicable laws and regulations (including but not limited to the Graham Leach Bliley Act). The Categories of Personal Information described below are subject to the CCPA. For more information about the personal information that may have been collected about you, please follow this link to the Privacy Statement.

COLLECTION OF PERSONAL INFORMATION

In the 12 months prior to the effective date of the Privacy Statement, we may have collected the below Categories of Personal Information from the indicated Categories of Sources; this information may have been shared with the described Categories of Third Parties for the specified Business Purposes. Categories of Sources, Categories of Third Parties, Commercial Purposes and Business Purposes are further defined in the Privacy Statement and below.

<table>
<thead>
<tr>
<th>Categories of Personal Information</th>
<th>Categories of Sources</th>
<th>Business and Commercial Purposes</th>
<th>Categories of Third Parties</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identifiers: contact information</td>
<td>You</td>
<td>Auditing</td>
<td>Government entities</td>
</tr>
<tr>
<td>provided for example your name,</td>
<td>Our Website</td>
<td>Security Purposes</td>
<td>Professional services</td>
</tr>
<tr>
<td>postal address, email address and</td>
<td>Affiliates, Subsidiaries or Vendors</td>
<td>Performing the Services</td>
<td>organizations</td>
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<tr>
<td>telephone number; date of birth</td>
<td>Mobile Applications</td>
<td>Quality Purposes</td>
<td>Advertising and social</td>
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<tr>
<td>provided; social profile and</td>
<td></td>
<td>Authentication</td>
<td>networks</td>
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<tr>
<td>network information; IP address;</td>
<td></td>
<td>Analytics</td>
<td>data analytics providers</td>
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<tr>
<td>device identifier; mobile ad</td>
<td></td>
<td>Web Traffic Analysis</td>
<td>Our affiliates and</td>
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<tr>
<td>identifier; cookies; beacons; and pixel tags.</td>
<td></td>
<td>Advertising</td>
<td>subsidiaries</td>
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<tr>
<td>Internet and Other Electronic</td>
<td>Your Use of Our Website</td>
<td>Auditing</td>
<td>Government entities</td>
</tr>
<tr>
<td>Network Activity Information:</td>
<td></td>
<td>Security Purposes</td>
<td>Professional services</td>
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<td>including the host from which</td>
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<td>Debugging</td>
<td>organizations</td>
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<tr>
<td>you access the Internet,</td>
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<td>Short Term Use</td>
<td>Advertising and social</td>
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<td>information about your device</td>
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<td>Performing the Services</td>
<td>networks</td>
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<td>(such as device properties,</td>
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<td>Services</td>
<td>Internet service providers</td>
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<td>settings, applications, storage,</td>
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<td>Internal R&amp;D</td>
<td>Data analytics providers</td>
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<td>and usage information), mobile</td>
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<td>Quality Purposes</td>
<td>operating systems and</td>
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<tr>
<td>application, browser and</td>
<td>Social Media Networks or Publicly Available Sources</td>
<td>Authentication</td>
<td>platforms</td>
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<tr>
<td>operating system software, the</td>
<td>Advertising Networks</td>
<td>Analytics</td>
<td>Our affiliates and</td>
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<td>date and time you access our</td>
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<td>Web Traffic Analysis</td>
<td>subsidiaries</td>
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<tr>
<td>websites and the address of the</td>
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<td>Advertising</td>
<td></td>
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<tr>
<td>site from which you linked to our</td>
<td></td>
<td>Analysis of Promotions</td>
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<td>website when you visit us.</td>
<td></td>
<td>Safety</td>
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<td>Geolocation Data: may be collected</td>
<td>Your Use of Mobile Applications</td>
<td>Auditing</td>
<td>Government entities</td>
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<td>from your devices only if enabled</td>
<td></td>
<td>Security Purposes</td>
<td>Professional services</td>
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<td></td>
<td></td>
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<td>organizations</td>
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</tbody>
</table>

...
Categories of Sources: in the 12 months prior to the effective date of the Privacy Statement, we may have collected Personal Information about you from the following Categories of Sources:

- **You**: we may collect information directly from you, for example, through transaction forms and your interactions with our partners or through providing customer support or consultation, including using email, postal mail, call centers or live chat;
- **Your Use of Our Website**: we may collect information from you or your device through your use of our Website, including online forms, registrations for loyalty and rewards programs or competitions, and other online Services we offer (some of which may be managed by third parties on our behalf) or through automated means such as communications protocols, email communications and cookies or similar technologies as described in the Privacy Statement section titled “INTERNET TECHNOLOGIES”;
- **Affiliates, Subsidiaries or Vendors**: we may collect information about you from our affiliates, subsidiaries or vendors who provide services on our behalf;
- **Social Media Networks or Publicly Available Sources**: we may collect information about you from social media or other public data sources; and
- **Advertising Networks**: we may collect information about you from advertising networks so we can serve you with advertisements we believe may be of interest to you.

Business Purposes: in the 12 months prior to the effective date of the Privacy Statement, we may have shared your Personal Information for the following Business Purposes:

- **Auditing**: related to our interactions with you and any concurrent transactions, including, but not limited to, counting ad impressions, verifying positioning and quality of ad impressions, and auditing compliance with applicable standards;
- **Security Purposes**: detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity and prosecuting those responsible for that activity;
- **Debugging**: debugging to identify and repair errors that impair the intended functionality of our systems;
- **Short-term use**: short term, transient use, including, but not limited to, the contextual customization of ads shown as part of your interactions with us;
- **Performing the Services**: in addition to the purposes described in the Privacy Statement, maintaining, or servicing accounts, providing customer service, processing, or fulfilling orders and transactions, verifying your information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services;
- **Internal R&D**: undertaking internal research for technological development and demonstration; and
- **Quality Purposes**: undertaking activities to verify or maintain the quality or safety of the Services and to improve, upgrade or enhance the Services.

Categories of Third Parties: in the 12 months prior to the effective date of the Privacy Statement, we may have shared your Personal Information with the following Categories of Third Parties:

- **Government entities**: government entities including law enforcement agencies;
- Professional services organizations: professional services organizations, such as law firms and independent auditors;
- Advertising and social networks: advertising and social networks (who may combine your personal information with their own records, and records available from other sources for their own marketing purposes);
- Internet service providers;
- Data analytics providers;
- Operating systems and platforms; and
- Our affiliates and subsidiaries.

SALE OF PERSONAL INFORMATION

We do not sell your personal information to third parties in exchange for money. We do participate in advertising, marketing, and analytic programs from which we and third parties with whom we contract may derive value; such exchanges may constitute a "sale" under applicable law. While participating in the above programs, in the 12 months prior to the effective date of the Privacy Statement, we may have “sold” your personal information to a third party including:

- Identifiers: contact information, for example your name, email address and telephone number; and
- Internet and Other Electronic Network Activity Information: including the host from which you access the Internet, your IP address or device advertising ID, 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.

CALIFORNIA RESIDENT RIGHTS

California residents have the right to request that their personal information not be sold to third parties. To exercise your right to opt out of the sale of your personal information, please submit a personal information request as described above in the section of our Privacy Statement entitled “ACCESSING, DELETING AND CORRECTING YOUR PERSONAL INFORMATION AND CHANGING YOUR CHOICES”.

In addition, if you are a California resident, you may have the right to request, twice in a 12-month period, the categories of personal information we have collected about you during the past 12 months and, for each category of personal information, the following information:

- the categories of sources from which we collected that information;
- our business or commercial purpose(s) for collecting that information;
- the categories of third parties to whom that information was sold or disclosed for a business purpose; and
- the business or commercial purpose(s) for which we sold or disclosed that information.

You also may have the right to request the deletion of the personal information we have collected from you. Once you have confirmed you are a California resident, you may submit a personal information request in accordance with the Privacy Statement section entitled “ACCESSING, DELETING AND CORRECTING YOUR PERSONAL INFORMATION AND CHANGING YOUR CHOICES” twice in any 12-month period. Upon receiving a request, we will confirm receipt of the request within 10 days and will provide information on how we will verify your identity and process your request. We will then respond to the request within 45 days.
We cannot connect individual consumers to passive website visits which may affect our ability to respond to certain requests. We has implemented the capability for the user to manage cookies on our websites and will only read or write cookies based on your preference level. When you visit our website, you will be presented with a banner instructing you how to manage your preferences.

You may also designate an authorized agent to make a personal information request on your behalf. If you choose to designate an agent, you may be required to provide the authorized agent with written permission to make your request and verify your own identity directly with us. We may deny a request from an agent that does not submit proof that they have been authorized by you to act on your behalf.

You have the right not to be discriminated against because you exercise any right described in the Privacy Statement or this Addendum.

If you have previously transacted with us, you have rights separate from those described above which are explained here.

**CONTACT**

Contact for More Information: for questions or concerns about our Privacy Statement and privacy practices, please contact us as specified in the “Contacting Us” section of the Privacy Statement.
## LEGAL ENTITY

### DATA CONTROLLERS

<table>
<thead>
<tr>
<th>Western Union Legal Name of Entity¹ (as of 1 March 2022)</th>
<th>Change of Legal Name to reflect Convera</th>
<th>Contact Information / Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Custom House Financial (UK) Ltd</td>
<td>Convera UK Ltd</td>
<td>200 Hammersmith Road, London, W6 7DL, United Kingdom</td>
</tr>
<tr>
<td>Western Union Business Solutions (Australia) Pty Ltd²</td>
<td>Convera Australia Pty Ltd</td>
<td>Level 12 1 Margaret Street, Sydney NSW, New South Wales, 2000 Australia</td>
</tr>
<tr>
<td>N/A</td>
<td>Convera Canada ULC</td>
<td>1500-100 Yonge Street, Toronto, Ontario, M5C2W1, Canada</td>
</tr>
<tr>
<td>Western Union Business Solutions (USA) LLC</td>
<td>N/A</td>
<td>Suite 400 7979 E. Tufts Ave, Denver, CO 80237</td>
</tr>
<tr>
<td>Western Union Business Solutions (Hong Kong) Ltd</td>
<td>Convera Hong Kong Ltd</td>
<td>Unit 2210-18, Tower 1, Millennium City 1, 388 Kwun Tong Road, Kwun Tong, Kowloon, Hong Kong</td>
</tr>
<tr>
<td>Western Union Business Solutions Japan KK</td>
<td>Convera Japan KK</td>
<td>c/o Kusunoki, Iwasaki &amp; Sawano, Holland Hills Mori Tower 11F 5-11-1, Toranomon, Minato-ku, Tokyo 105-0001, Japan</td>
</tr>
<tr>
<td>Western Union Business Solutions (Malta) Limited</td>
<td>Convera Malta Financial Limited</td>
<td>W Business Centre, Level 5, Triq Dun Karm, Birkirkara, Malta</td>
</tr>
<tr>
<td>WUBS Financial Services (Singapore) Pte Ltd</td>
<td>Convera Singapore Financial Pte Ltd</td>
<td>77 Robinson Road, #35-01 Robinson 77 Singapore, 068896</td>
</tr>
<tr>
<td>Western Union Business Solutions (Singapore) Pte Ltd</td>
<td>Convera Singapore Pte Ltd</td>
<td>77 Robinson Road, #35-01 Robinson 77 Singapore, 068896</td>
</tr>
<tr>
<td>Ruesch International, LLC (Switzerland)</td>
<td>Convera Switzerland, LLC</td>
<td>The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street</td>
</tr>
</tbody>
</table>

¹ Convera is not affiliated with The Western Union Company and utilizes the Western Union name under a limited license. Western Union named entities are intended to be rebranded “Convera” in due course. Upon completion, updated information will be included in this Privacy Statement.

² Data controller for Services as described in this Statement in Australia, Japan, New Zealand