

Privacy Statement

Data Controller	Western Union International Bank GmbH, Italian Branch
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Western Union Business Solutions (WUBS) is a division of The Western Union Company.

This Privacy Statement describes how WUBS collects and uses your personal information in connection with enrolling you for or providing services in **Italy**. “Personal information” means all information that relates to an identified or an identifiable individual.

INFORMATION WE COLLECT:

Information we collect from you: When you enrol for our services, use our services, or contact us, we collect personal information about you, and we may use it along with other information collected or generated during our relationship with you. We collect your contact information, information about your use of our services, details of any payors or beneficiaries of yours, and marketing choices.

To conduct a payment or money transfer, or to enter a foreign exchange derivative contract with us, and thus enable you to become a client, you must provide certain information required by us to execute the transaction and to comply with our legal obligations associated with providing our services. Failure to provide some of your personal information may affect our ability to provide our services to you. We will inform you when information is required in order to use our services.

In addition to the information we collect from you, we may also collect your information from Western Union or WUBS affiliates or from third parties, such as the person to whom you send money or from whom you receive money, agents, business partners, verification companies, payments and fraud risk management companies, law enforcement and regulatory bodies, and commercial and public data sources. We may also conduct credit reference checks on you and your business using a licensed credit reference agency. Information can also be provided to us by third parties who are authorized under applicable law to initiate transactions or perform account-related services on your behalf, such as account information service providers or payment initiation service providers.

Information you provide to us about other people: In order to make payments to people using our services, you need to provide us with certain information about the individual or business that you wish to make a payment to. At times, we may also collect information directly from someone paying money to you. This information is necessary for us to provide the service and comply with our legal and regulatory obligations. Failure to provide some of the information may affect our ability to provide our services to you and your payor or beneficiary, and we will inform you when information is required in order to provide our services. In addition to the information you provide to us, we may also collect information from commercial and public data sources, law enforcement and regulatory bodies, and verification, fraud and risk management companies as part of providing the services.

Information collected online: Please note that if you use our online services, we may collect additional information about you, your payors, or your payees. The way we collect and use data in connection with our online services is governed by our Online Privacy Statement. You will have an opportunity to view the Online Privacy Statement as part of registering for our online services.

LEGAL BASES AND LEGITIMATE BUSINESS PURPOSES FOR WHICH WE USE PERSONAL INFORMATION:

In general, we use the information you provide and that we collect from other people for the following legal bases and legitimate business purposes:

Providing our services to you: This includes using information necessary for performing contracts or for taking steps to enter into a contract with you, including conducting money transfers, payment services, or delivering other products or services.

Legal and compliance purposes: This includes using your personal information to comply with legal and regulatory duties, such as 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. This may also include establishing, exercising, or defending legal rights and claims, monitoring and reporting compliance issues, or responding to legal process. Additionally, this may include using your details to validate and authenticate your identity and using third parties to help us do this, as well as retaining records containing your personal information as required under applicable law.

Legitimate business purposes: We use your personal information to analyse and improve our products, locations, services, operations and your customer experience. This may include using your information to conduct market research surveys. We may also use your personal information to provide customer service, to conduct other administrative tasks necessary to provide our services, to help manage risks related to security, fraud and identity, and to protect the security and integrity of our technology, systems, and services. We conduct analysis of the information we hold to better understand our customers, including profiling analytics to help us target marketing and tailor our products and services to your needs and requirements. We may combine personal information you provide with information from other products and services and convenience and/or rewards programs for which you have registered. We may also conduct credit checks on you and your business using a licenced credit reference agency. Subject to your choices and based on the contact information you provide, we may send you commercial communications or offers by email, telephone, post, SMS, social media or other communication channels.

DISCLOSURE OF YOUR INFORMATION:

If there is a reasonable need to do so for any of the purposes listed above, we may disclose or provide access to your information to the following types of organisations or parties:

- Western Union group companies, including but not limited to, Western Union International Bank GmbH (Austria), Western Union Financial Services, Inc (USA), and Custom House Financial (UK) Limited;
- Our agents or business partners who facilitate the specific service or money transfer transaction you have requested;
- Service providers, payments processors, banking partners and other data processors contracted to provide business and customer services on our behalf, including providing customer service, providing commercial communications, or conducting customer satisfaction research on our behalf;
- Service providers and data processors contracted to help us validate the accuracy of the information provided by you, including to authenticate your identity and manage risks related to security, fraud, money laundering 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 also disclose your personal information, as required or permitted by applicable laws and regulations, to regulatory authorities, law enforcement bodies, courts, governments or government agencies globally, in order to meet compliance and legal obligations or to assert or defend the rights and interests of Western Union or others. We may transmit personal information we possess in connection with a sale or transfer of all or part of our business. We may disclose information about whether you are making payments owed to us, any debt you have with us and any suspected or proven fraud to one or more licenced credit reference agencies on a one-off or on-going basis.

International data transfer: We may provide your information to Western Union group companies or to third parties in countries outside the European Economic Area (EEA), including but not limited to the USA. The privacy law in countries to which personal information is transferred may not provide the same level of data protection as is in force within the EEA. If this is the case, transfers of your personal information to parties outside the EEA will be protected by EU-approved mechanisms for transferring data internationally, including by appropriate contractual clauses, as required by law. You can request to see these mechanisms using the contact details in the Contact Us section.

Choice and opt-out: Subject to your choices and based on the contact information you provide, we may send you commercial communications about our and third party products and services, which may include offers by email, telephone, post, SMS, social media and other communication or digital channels. You can opt out of receiving marketing communications at any time. Marketing communications we send will generally have opt-out options, and you may also opt out by contacting us as outlined below. Please note that if you choose to withdraw your consent, you may not be able to participate in or benefit from our programs, services and initiatives for which you provided consent.

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 as long as necessary for the specific purposes it was collected, or to resolve any query you may raise. As a general rule, we will typically keep your information for no longer than 10 years after a given transaction, unless we have a legal obligation to keep it for a longer period.

Your rights and the right of people whose information we process: 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 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 erase information about you, to restrict our use of your information, or to object to certain uses of it. You also have the right to lodge a complaint with a 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. We will comply with your request to the extent required by applicable law.

To exercise these rights, please contact Western Union Business Solutions through the following channels:

E-mail: wubsprivacy@westernunion.com

By Mail:

Customer Care
Western Union Business Solutions
Worldwide House, Thorpe Wood, Peterborough, Cambs, PE3 6SB

You can also contact our Data Protection Officer on:

Unit 9 Richview Office Park
Clonskeagh
Dublin 14
Ireland

or by wubsprivacy@westernunion.com