



CUSTOMER PRIVACY NOTICE

Effective Date: November 2020

At Small World Financial Services Group Ltd (Small World) we are committed to protecting and respecting your privacy and therefore, all processing operations carried out upon personal data comply strictly with all the requirements established in the General Data Protection Regulation (GDPR) as well as any other applicable local data protection regulations.

When we provide Small World services to you, we also give you specific additional details about how we will use your personal information in contract terms and/or additional privacy disclosures.

1. SCOPE OF THIS PRIVACY NOTICE

This Privacy Notice applies to Small World websites and when you interact with Small World anywhere in the world. It describes how Small World and our Providers, collect, use, share, and keep information that we get about you online and offline.

For example, this Privacy Notice applies when you:

- Use Small World's services, either directly or through our agents, mobile applications, or websites;
- Interact with Small World on social media or reply to electronic communications from us; or
- Contact or interact with Small World.

We do not knowingly attempt to solicit or receive information from children or minors per local law. In addition, we are not responsible for other company's privacy policies and practices. We don't endorse other company's policies and practices when we provide a link to a website.

From time to time, we will change this privacy notice. Depending on the nature of these changes, we will inform you through our written communications or through our website. Otherwise, we recommend that you check the current version available here. If we make changes to this statement, we will update the "Effective Date" at the top of this page.

2. DATA CONTROLLER RESPONSIBLE OF PROCESSING YOUR DATA & OTHER INFORMATION

Small World Financial Services Group Ltd (Small World) is the entity responsible for the management of the jointly-used personal data and other information. Small World incorporates, among others, the following European legal entities:

1. LCC Trans-Sending Ltd (including branches incorporated in Ireland, Germany, Netherlands & Italy)
2. LCC Trans-Envio SPRL
3. Swiss Transfers GmbH
4. Small World FS, Ireland Ltd
5. Small World FS Norway AS
6. Small World FS, Spain SAU
7. Small World FS, Sweden AB
8. Small World Financial Services Spain S.A.
9. Small World Exchange Services, SLU
10. Trans-Envio, Agencia de Cambios, Unipessoal LDA

If you have any questions about the lawful bases upon which we collect and how we use your personal data, please contact:

SMALL WORLD FINANCIAL SERVICES GROUP

Group Data Protection Officer

dpo@smallworldfs.com

Paseo del Club Deportivo 1, Edificio 13
Pozuelo de Alarcón, Madrid – Spain (28223)

2. HOW SMALL WORLD COLLECTS YOUR PERSONAL INFORMATION

We collect personal information in a variety of ways, including:

- Directly from you: when you interact with us and use our services. For example, when (a) you ask us or one of our affiliated companies, Small World agents to send or receive money sign up to or use any of our other products or services; (b) you submit personal information on applications or other forms to us or our Agents (transactions); or (c) you otherwise submit personal information to us, our Agents or other.

If you provide information about someone else, you represent that you have permission to do so.

- Indirectly from other third party sources: such as our business customers, government agencies, consumer and credit reporting agencies, public databases, joint marketing partners, social media platforms, and from other third parties.

3. WHAT INFORMATION DOES SMALL WORLD PROCESS AND FOR WHAT PURPOSES

In order to comply with the duty of information contained in the GDPR, we want to provide you as much information as possible regarding the personal data processing operations Small World carry out, which categories of data and for what specific purpose and legitimation in each of all personal data processing operations.

The personal information we collect includes, but is not limited to:

- Name, middle name and last name.
- Address.
- Telephone/mobile number.
- Email.
- Information to confirm your identity, including the identification and a copy of the identification document.
- Transaction activity.
- Bank account and payment information.
- The products and services you have with us and your use of them.
- Computer's IP address and other online activity details (domain and host from which you access the Internet, browser and operating system software, the date and time you access our website and the address of the site from which you linked to our website when you visit us).

We use the information we collect about you, either on its own or combined with other information: (i) where it is necessary to perform and administer our contractual relationship with you; (ii) for our own legitimate interests to provide you with better services (such as to reduce fraud); (iii) where we have obtained your consent (such as for certain marketing purposes); or (iv) for compliance with applicable laws.

Thus, we have segmented the different purposes and legitimation for the main personal data processing operations, in order to facilitate its reading, clarity and comprehension:

3.1. With the aim to perform and administer our contractual relationship with you, we may use your information to:

- Provide, deliver and assist in providing, managing and delivering any products and services to you (including money transfers, administer and enforce transactions, manage your customer relationship, payment services and other Small World products or services);
- Confirm your eligibility for any service you apply for, and to verify any of the information you provide and maintain accuracy of our records, and to help us improve and develop these services.

3.2. We may use your information to comply with applicable laws and regulation around the world, including to:

- Comply with legal, auditing, insurance, security and regulatory obligations including those aimed at monitoring and preventing money laundering and related criminal or suspected criminal activity;
- Establish, exercise, or defend legal rights or claims and assist in dispute resolution; or
- As required or permitted by law (such as performing due diligence on customers before approving their registration/applications).

3.3. To send you marketing communications and promote our services, we may also ask for your consent to:

- Contact you from time to time by telephone, post, e-mail or SMS/MMS messaging and targeted or personalized messaging (e.g. on social media and other digital channels) with news, offers, services and promotions concerning Small World services or our business partners;
- Recognise you when you return to our websites, receive our emails, or use Small World's app (for example, we may send you tailored ads, promotions, offers or content).

You can opt-out from receiving marketing communications from us by:

- Updating your choices on your Small World account;
- Clicking on the "unsubscribe" link at the bottom of a Small World marketing email;
- Replying "STOP" to a text or SMS message; or
- Contacting us at: dpo@smallworldfs.com

We will respond to your request as soon as reasonably practicable. Please note withdrawing of consent cannot have retroactive effects and would be effective

within 3-5 days at most (due to technical issues) from receiving your request. We may still send you transactional or administrative messages.

3.4. For our legitimate interests or for the legitimate interests of others, we may use your information to deliver services, advertise, conduct research and analysis, and manage our fraud and security risks, in the following ways:

- Improve your experience and the operation of our business, store your preferences, passwords and other information and track activity on our website;
- To better understand the effectiveness of our promotional campaigns;
- Determine whether you came to our site from a banner ad or an affiliate website;
- Deliver information specific to your interests on additional websites, to determine whether you've acted on our promotional messages;
- Manage fraud and security risks, including to review and approve individual transactions you make through digital channels, detect and prevent fraud or criminal activity and/or safeguard the security of your information);
- Report to credit bureaus, court orders and legal investigations;
- Produce data analytics, statistical research, and reports;

If you apply to become a Small World Agent, we will use the personal information you provide to consider your application and verify your suitability and eligibility to be an agent.

4. HOW LONG WILL SMALL WORLD RETAIN YOUR DATA

We would like to inform you that Small World process and store your personal data while the contractual relationship is maintained in order to deliver our services, unless we are required to keep it for longer periods because of law, regulation, litigation or regulatory investigations. Therefore, Small World is subject to storage and documentation obligations.

Once our relationship with you has come to an end (e.g. following a transaction), or you decide to cancel and not to go ahead with a transaction, we will only retain your personal data for a period of time that is calculated depending on the type of personal data, and the purposes for which we hold that information.

As we have said, the personal data retention period shall be deemed to different variations. In any case, it will be the minimum needed (for example, depending on the applicable local regulations on money laundering and prevention of terrorism).

In the event you have accepted and consented to receiving communications about issues concerning Small World, as well as marketing communications, personalized advertisements, studies and surveys related to Small World; we will retain your personal data from the date on which you first subscribe until the date on which you request to unsubscribe.

In the case that the personal data submitted is no longer necessary to comply with our contractual and legal obligations, it will be regularly deleted or permanently de-identified, protecting your privacy in all cases, unless a limited further process is necessary to comply with any legal obligation, bring/respond to a legal claim or additional purposes, as described above.

5. HOW SMALL WORLD SHARE AND DISCLOSE YOUR INFORMATION

We may share your personal data and other information only with your consent or as required or permitted by applicable law, such as:

- We may share and disclose personal information with Small World group companies like the following:
 - ❑ LCC Trans-Sending Ltd (including branches incorporated in Ireland, Germany, Netherlands & Italy)
 - ❑ LCC Trans-Envio SPRL
 - ❑ Choice Money Transfer Inc
 - ❑ Choice Money Transfer (Canada) Ltd
 - ❑ Swiss Transfers GmbH
 - ❑ Small World FS, Africa SA
 - ❑ Small World FS, Ireland Ltd
 - ❑ Small World FS Norway AS
 - ❑ Small World FS, Spain SAU
 - ❑ Small World FS, Sweden AB
 - ❑ SW Brasil Serviços Financeiros e Turismo Ltda
 - ❑ Small World Exchange Services, SLU
 - ❑ Small World Financial Services Spain SA
 - ❑ Trans-Envio, Agencia de Cambios, Unipessoal LDA

- Our vendors that provide us with services related to information technology and related infrastructure provision, such as website hosting, data centers and cloud computing;
- Our vendors that helps us comply with background screenings where required or permitted by law, in particular, anti-money laundering and counter financing terrorism laws and regulations, process transactions, validate customer information, and help us prevent debt, fraud, theft or loss;
- Correspondent banks and non-banks processing payments to beneficiaries;
- Other third parties in the event of a reorganization, merger, sale, joint venture, assignment, transfer to other disposition of our business, assets or stock, or in any bankruptcy or similar proceedings; and
- Law enforcement agencies, regulatory agencies, security authorities or other financial entities, when required or permitted by law, in particular, anti-money laundering and counter financing terrorism laws.

We may transfer your personal data and other information outside the European Economic Area, such as to the United States or UK (where our main operational data centres are located) to operate our business, process transactions and provide you with our products or services. Regardless of where we process your information, we will take appropriate steps (such as including Standard Contractual Clauses, data processing agreements and additional contractual protections) to ensure an adequate level of protection for your information in other countries outside the EEA, including the USA or the UK, where data protection laws may not be as comprehensive as the EEA.

6. WHAT ARE YOUR RIGHTS?

You can exercise (to the extent provided to you by applicable law), the following rights:

- Right of access to the information we hold on you. At any point you can contact us to request the information we hold on you as well as why we have that information, who has access to the information and where we got the information. We may charge a reasonable fee based on administrative costs if your access requests are unfounded or excessive.

- Right to rectification and update the information we hold on you. If the data we hold on you is out of data incomplete or incorrect, you can inform Small World and it shall be updated.
- Right to erasure. If you feel that we should no longer be using your data or that we are illegal using your data, you can request that we erase the data we hold. When received your request, will confirm whether the data has been deleted or the reason why it cannot be deleted.
- Right to restrict and/or object to the use of your data. Upon receiving this request, we will contact you if we are able to comply or if we have legitimate grounds/legal obligations to continue processing your data.
- Right to data portability. You have the right to request that we transfer your data to another data controller.

In order to process your right requests, Small World may need to verify your identity for your security and protection of your personal data and other information.

If you wish to make a complaint about how Small World process your personal data and other information or exercise your rights, you may contact:

Group Data Protection Officer

dpo@smallworldfs.com

Paseo del Club Deportivo 1, Edificio 13
Pozuelo de Alarcón, Madrid – Spain (28223)

If you consider that we have not given you a satisfactory response to your request to exercise a right or complaint, you can file a complaint with the competent Data Protection Supervisory Authority.

For your information, our Lead Supervisory Authority within the European Union (EU) is the Spanish Data Protection Agency (Agencia Española de Protección de Datos - AEPD). Please visit www.aepd.es for further details.

For complaints in the UK scope, the competent data protection supervisory authority is the Information Commissioner's Office (ICO). Please visit <https://ico.org.uk/> for more information.