

# Data Privacy Notice

International Payments at John Lewis Finance is provided by XE Europe B.V. (the "Service").

In this Privacy Notice we explain how we collect and use your personal information that we obtain when you use our services, visit or use our websites or mobile applications or otherwise interact with us in the European Economic Area, how we share your information and the steps we take to protect your information.

HiFX Europe Limited at Rozengracht 12, 1<sup>st</sup> floor, Amsterdam in the Netherlands will be the "data controller" in relation to personal data provided to us directly via email, phone, and post or via [internationalpayments.johnlewisfinance.com](mailto:internationalpayments.johnlewisfinance.com) (the "Website") in connection with the registration for and provision of the Service.

John Lewis plc at 171 Victoria Street, London SW1E 5NN is a "data controller" in connection with personal data you provide, and which is used, for marketing communications and statistical research and analysis carried out by John Lewis plc.. The John Lewis Plc privacy policy (available at: <https://www.johnlewisfinance.com/privacy.html>) shall apply to such marketing communications and statistical research and analysis

## 1. Who we are and the application of this Privacy Notice

This Privacy Notice applies to Xe Europe B.V. ("we", "our" or "us"), a subsidiary of Euronet Worldwide, Inc. ("Euronet"). Further details on Euronet and the companies within the Euronet group (the "Euronet Group") are available at: <http://www.euronetworldwide.com>.

Our affiliate companies in the Euronet Group include HiFX Europe Limited in the United Kingdom and Xe Corporation in Canada. We are committed to the privacy and security of your personal data. This Privacy Notice describes how we collect and use personal data, in accordance with applicable law and our standards of ethical conduct.

Xe Europe B.V. at Rozengracht 12,1, 1016NB AMSTERDAM will be the "data controller" in relation to any personal data provided to us directly via email, phone, and post or via <https://www.xe.com/xemoneytransfer/eu> (the "Website"). This means that we are responsible for deciding how we will hold and use personal data about you.

The Euronet Group Data Protection Officer can be contacted in writing at [DPO@xe.com](mailto:DPO@xe.com) or Calle Cantabria, 2 28108 Alcobendas, Madrid, Spain or by telephone +34 912868268.

By using or navigating the Website or the Service, you acknowledge that you have read, understand, and agree to be bound by this Privacy Notice. You should not provide us with any of your information if you do not agree with the terms of this Privacy Notice.

If your Money Transfer account is held jointly with another person, this Privacy Notice applies to both joint account-holders individually and together.

We encourage you to review and check the Website regularly for any updates to this Privacy Notice. We will publish the updated version on the Website and by continuing to deal with us, you accept this Privacy Notice as it applies from time to time.

## 2. Data Protection Principles

"Personal data" means any information that enables us to identify you or the beneficiary of your transaction with us, directly or indirectly, such as name, email, address, telephone number, any form of identification number or one or more factors specific to your or your beneficiary's identity.

We are committed to complying with applicable data protection laws and will ensure that personal data is:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- Relevant to the purposes we have told you about and limited only to those purposes;
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes we have told you about; and
- Kept securely.

## 3. What personal data do we collect and how do we collect it?

Personal data you give us

We may collect personal data when you give it to us, including when you indicate that you would like to receive any of our Services, when you register with us, when you complete forms online, when you speak with us over the telephone, when you write to us, when you visit the Website and, in certain circumstances as set out in this Privacy Notice, when you have provided your information to a related company operating under the HiFX, Xe brand or xe.com (each a "Xe Company" and together the "Xe Companies"). We will also collect details of transactions you carry out through the Website and of the fulfilment of such transactions.

We may collect and process the following personal data:

- Personal details, such as data which may identify you or the beneficiary of your transaction with us. This may include your name, title, residential and/or business address, email, telephone and other contact data, date of birth, gender, images, signature, passport/visa details; and names and personal details of

beneficiaries of transactions (“Identity Personal Data”);

- Financial details, such as data relating to you and your beneficiary’s payment data and bank account obtained for the purposes of money transfers (“Transaction Personal Data”);
- Additional details requested by law enforcement or requested pursuant to our compliance procedures in connection with efforts to prevent money laundering, terrorist financing and criminal activity, such as relationship to the beneficiary of the transaction, the purpose of the transaction and proof of funds (“Compliance Personal Data”); and / or
- Information from which you may be indirectly identified, such as a client identification number or online identifier (“Indirectly Identifiable Personal Data”).

#### Cookies and similar technologies

When you use our Website or mobile apps we collect information via cookies and similar technologies, including the IP address of visitors, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. We may use this data for the following purposes:

- To measure the use of our Website and services, including number of visits, average time spent on a website, pages viewed, page interaction data (such as scrolling, clicks, and mouse-overs), etc., and to improve the content we offer;
- To administer the Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; and
- As part of our efforts to keep the Website safe and secure;

Due to their core role of enhancing or enabling usability or site processes, disabling cookies may prevent you from using certain parts of our Website. It will also mean that some features on our Website will not function if you do not allow cookies

For more information please read our Cookie Policy.

## 4. How we use your personal data?

We have summarised below the ways in which we may use your personal data and our basis for such usage:

How we use personal data	Our basis for using your personal data
<b>Registration and administration.</b> We may use <b>Identity Personal Data</b> and/or <b>Compliance Personal Data</b> to enable you to register with us and, once your registration with us is complete, for the administration of your account, to contact you, to update our records about you, and to respond to and process your queries and requests.	Taking steps prior to entering into a contract with you. Performance of a contract with you.

## How we use personal data

## Our basis for using your personal data

### **Requesting access to tools and information.**

You may wish to have access to certain tools and information made available on Our Website before or after you decide that you would like to register to use the Services, including our foreign exchange and payment service. We may collect **Identity Personal Data** as part of this access and use **Identity Personal Data** so that we can supply you with information about our Services and relevant market information.

Taking steps prior to entering into a contract with you.

Performance of a contract with you.

**Supply of our Services.** We may use **Identity Personal Data, Transaction Personal Data** and/or **Compliance Personal Data** so that we can supply you with our Services which you use or have requested and to meet our contractual obligations to you.

Performance of a contract with you.

Your consent for us to process your personal data for the purposes of supplying you with the Services.

**Service communications.** We may use **Identity Personal Data** and/or **Transaction Personal Data** to notify you about changes or developments relating to our Services which you used or have requested.

Necessary to comply with a legal obligation.

Necessary for our legitimate interest to notify you about changes or developments relating to our products and services which you use or have requested.

**Compliance.** We may use **Identity Personal Data, Transaction Personal Data** and/or **Compliance Personal Data** for our compliance purposes, including the prevention and detection of crime, tax evasion or fraud.

Necessary to comply with a legal obligation.

**Recording of telephone calls.** We may monitor and record our telephone calls with you (which may involve **Identity Personal Data, Transaction Personal Data** and/or **Compliance Personal Data**) and we may use any transcripts of these calls so we can be sure we understand the instructions you give us and so we have a clear record of the products and services you have requested.

Necessary to comply with a legal obligation. Performance of a contract with you.

**Marketing.** In certain circumstances, we may use your **Identity Data** to contact you with marketing communications in relation to the Services or the services and products of Xe Companies (which may include Xe Corporation).

See section 10 below.

### **Non-identifiable data**

Whenever possible, we use data from which you cannot be identified directly (such as IP addresses and anonymous demographic data) rather than personal data. This non-identifiable data may be used to tailor your experiences with the Services by showing content in which we think you will be interested and displaying content according to your preferences. We may use aggregate data for a variety of purposes, including analysing user behaviour and characteristics in order to measure interest in (and use of) the various portions and areas of the Services. We also may use the data collected to evaluate and improve the Services and analyse traffic to the Services.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such data without further notice to you.

## 5. Is data collected shared with third parties?

## John Lewis Plc

We may share your information with John Lewis Plc which is part of the John Lewis Partnership group and includes the brands John Lewis Finance, John Lewis and Waitrose (together, the "John Lewis Partnership"). Further information about the John Lewis Partnership, together with contact information and details of its products and services and the privacy policy applicable to the John Lewis Partnership, can be found at [johnlewispartnership.co.uk](http://johnlewispartnership.co.uk). The personal data we share with the John Lewis Partnership may be used by John Lewis Partnership to enable it to review, develop and improve its products and services; for statistical research and analysis; and if you have consented and not withdrawn your consent, to help identify products and services that may be of interest to you and for direct marketing purposes.

## Xe Companies

We may share your personal data with other Xe Companies (including to HiFX Europe Limited (which trades as Xe) in the United Kingdom and Xe Corporation in Canada) in order to enable or facilitate us to provide you with any of the Services you have requested, where you have asked us to do so, to provide the Services to you outside of normal business hours and, where you have consented and not withdrawn your consent, for the Xe Company's direct marketing purposes.

## Euronet Group

We may share your personal data with Euronet and affiliates in the Euronet Group (some of which are based outside the European Economic Area (EEA) and in Canada and the United States – further details are set out at the end of this section 5) for the purposes, or to enable or facilitate the purposes, set out in section 4 of this Privacy Notice. This may include sharing your personal data within the Euronet Group for compliance purposes.

## Aggregated statistical analysis

We may use statistical analysis of aggregate data to inform advertisers of aggregate user demographics and behaviour, as well as the number of users that have been exposed to or clicked on their advertising banners. We will provide only aggregate data from these analyses to third parties.

## Third party service providers

We may share personal data we collect with the following third party service providers to manage, enable or facilitate certain aspects of the Services we provide.

- Compliance verification service providers.
- Financial services providers, such as banks.
- Credit control or debt collection agencies.
- Fraud Prevention Agencies - The personal information we have collected from you will be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance, or employment. Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be found at [www.cifas.org.uk/fpn](http://www.cifas.org.uk/fpn).

We have safeguards in place with such third party service providers requiring them to protect your personal data.

## Third party service providers - SCHUFA

If you are a customer based in Germany, we may share your personal data with SCHUFA Holding AG for compliance verification purposes. SCHUFA Holding AG requires the following disclosure to and confirmation from you:

I hereby consent to the disclosure of my personal data to SCHUFA (SCHUFA Holding AG, Kormoranweg 5, D-65201 Wiesbaden) for the purpose of verifying my identity. I understand that SCHUFA will then report the degree of conformity of the data provided by me with the data contained in its records as a percentage and, if applicable, the advice of a proof of legitimation backed by an identity card, executed by SCHUFA or an other contract partner in the past to HiFX Europe Limited. On the basis of the results provided by SCHUFA, HiFX Europe Limited may thus determine whether an individual is registered in the SCHUFA database at the address indicated by me. No further data will be exchanged. No alternative addresses will be reported, nor will my data be stored in the SCHUFA records. Only the fact that my address has been checked will be kept on record by SCHUFA. Further information is available at HYPERLINK "<http://www.meineschufa.de>" [www.meineschufa.de](http://www.meineschufa.de).

If you are a customer based in Germany, and do not agree with the confirmation set out above, you should not give us any personal data.

## Corporate process

We may transfer your personal data to a third party as a result of a sale, acquisition, merger, or reorganisation involving Euronet, a company within the Euronet Group, or any of their respective assets. In these circumstances, we will take reasonably appropriate steps to ensure that your information is properly protected.

## Legal and regulatory

We may also disclose your personal data in special cases if required or requested to do so by law, court order, or other governmental authority, or when we believe in good faith that disclosing this data is otherwise necessary or advisable, such as to identify, contact, or bring legal action against someone who may be causing

injury to – or interfering with our rights or property, our services, another user, or anyone else that could be harmed by such activities (for example, identify theft or fraud).

## **Sharing personal data outside the EEA**

The nature of our products and services means that we may need to share your personal data with recipients based in countries outside the EEA. The countries to which we may need to send your information would normally be obvious to you based on your requested transaction.

As explained above, we may share your personal data within the Euronet Group, which may involve transferring and storing your data outside the EEA. Where we do so, we will ensure a similar level of protection to that afforded in the EEA; for example, on the basis the relevant recipient country (for example, Canada) has been deemed by the European Commission to provide an “adequate” level of protection for personal data or by contractual provisions that seek to ensure a level of protection and safeguarding of personal data.

If our use of third party service providers involves sharing your personal data outside the EEA, we will ensure the service provider provides safeguards and assurances regarding the protection of your personal data.

## **6. How long is your personal data retained?**

Personal data is used for different purposes and is subject to different standards and regulations. In general, personal data is retained for as long as necessary to provide you with services you request, to comply with applicable legal, accounting or reporting requirements, and to ensure that you have a reasonable opportunity to access the personal data.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. For example:

- Legal and regulatory requirements. We will retain your personal data for a period after closure of your account with us or the last transaction we carried out for you, based on legal and regulatory requirements, our compliance procedures and legal limitation periods. Generally, this retention period will be a minimum of six years.
- Customer service. If you provide us with your personal data but do not have an account with us, we will (subject to any legal or regulatory considerations) retain your personal data for as long as necessary to deal with your query (for example, to address your questions in the event of an unsuccessful application).

## **7. Is correspondence that you send to us saved?**

Yes. If you send us correspondence, including e-mails, we may retain such data along with any records of your account. We may also retain customer service correspondence and other correspondence involving you, us and any XE Company, our partners, and our suppliers. We will retain these records in line with our retention policy.

## **8. Data Security**

We are committed to maintaining the security of your personal data and have measures in place to protect against the loss, misuse, and alteration of the data under our control.

We employ modern and secure techniques to protect our systems from intrusion by unauthorised individuals, and we regularly upgrade our security as better methods become available.

Our datacentres and those of our partners utilise modern physical security measures to prevent unauthorised access to the facility. In addition, all personal data is stored in a secure location behind firewalls and other sophisticated security systems with limited (need-to-know) administrative access.

All our employees who have access to, or are associated with, the processing of personal data is contractually obligated to respect the confidentiality of your data and abide by the privacy standards we have established.

Please be aware that no security measures are perfect or impenetrable. Therefore, although we use industry standard practices to protect your privacy, we cannot (and do not) guarantee the absolute security of personal data.

## 9. Does this Privacy Notice apply to other websites?

No. Our Website ([internationalpayments.johnlewisfinance.com](http://internationalpayments.johnlewisfinance.com)) may contain links to other Internet websites. By clicking on a third party advertising banner or certain other links, you will be redirected to such third party websites.

We are not responsible for the privacy policies of other websites or services. You should make sure that you read and understand any applicable third party privacy policies, and you should direct any questions concerns to the relevant third party administrators or webmasters prior to providing any personal data.

## 10. Direct marketing

In certain circumstances, John Lewis Partnership may contact you with targeted marketing communications. The John Lewis Plc privacy policy ([available at: https://www.johnlewisfinance.com/privacy.html](https://www.johnlewisfinance.com/privacy.html)) shall apply to these communications and your preferences related to the same.

## 11. What are my data protection rights?

Subject to verification of your identity, you may request access to and have the opportunity to update and amend your personal data. You may also exercise any other rights you enjoy under applicable data protection laws.

“Data Subjects” in the EEA have the right to:

- Request access to any personal data we hold about them (“Subject Access Request”) as well as related data, including the purposes for processing the personal data, the recipients or categories of recipients with whom the personal data has been shared, where possible, the period for which the personal data will be stored, the source of the personal data, and the existence of any automated decision making;
- Obtain without undue delay the rectification of any inaccurate personal data we hold about them;
- Request that personal data held about them is deleted provided the personal data is not required by us, an Xe Company or the Euronet Group for compliance with a legal obligation under applicable law or for the establishment, exercise or defence of a legal claim;
- Under certain circumstances, prevent or restrict processing of their personal data, except to the extent processing is required for the establishment, exercise or defence of legal claims; and
- Under certain circumstances, request transfer of personal data directly to a third party where this is technically feasible.

Also, where you believe that we have not complied with our obligations under this Privacy Notice or the applicable law, you have the right to make a complaint to a relevant Data Protection Authority or through the courts. Although not required, we would encourage you to let us know about any complaint you might have and we will respond in line with our complaints procedure set out in Section 14 of this Privacy Notice.

## 12. Complaints procedure

Where you believe that we have not complied with our obligations under this Privacy Notice, or the applicable law, you have the right to make a complaint to a Data Protection Authority or through the courts.

Although not required, we would encourage you to let us know about any complaint you might have and we will respond in line with our complaints procedure – our contact details are set out in Section 15 below.

We have established internal procedures for investigating any complaint, which may also involve experienced members of staff from XE Companies (including HiFX Europe Limited in the United Kingdom) considering or investigating the complaint. Where appropriate, this will be someone who was not directly involved in the matter which is the subject of your complaint. The member of staff will either have authority to settle your complaint or will have ready access to someone who has the authority.

For more information regarding our complaints procedure, please read our Complaints Charter.

If you are not satisfied with our reply/outcome, or otherwise with the handling of the complaint, you have the right to lodge a claim before a relevant Data Protection Authority or the courts. In The Netherlands the Data Protection Authority is De Privacy Autoriteit (website: <https://www.autoriteitpersoonsgegevens.nl/> and telephone: 088 - 1805 250).

## 13. Contact Us

If you have any questions or concerns about this Privacy Notice or our data practices, please contact us in writing by email at [dataprotection@xe.com](mailto:dataprotection@xe.com) or by post to the Compliance Officer, at our registered offices at Rozengracht 12,1, 1016NB AMSTERDAM.

Any complaints will be handled in line with our complaints procedure as set out in Section 12 of this Privacy Notice.

International Payments at John Lewis Finance is provided by XE Europe B.V.. XE a limited company registered in The Netherlands with company no. 72587873, and registered office at Rozengracht 12,1, 1016NB Amsterdam, The Netherlands.

John Lewis Finance is a trading name of John Lewis Plc. Registered office: 171 Victoria Street, London SW1E 5NN. Registered in England (Registered Company Number 233462).

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