

# Privacy Statement

## Vina Remittance Experss AS (VINAREX) Online Privacy Statement

Effective Date: January 2016

This Privacy Statement describes how VINAREX collects and uses your personal information that we obtain when you visit or use our website in the European Economic Area.

### **INFORMATION WE COLLECT**

VINAREX collects personal information about you from a variety of sources including but not limited to those below. You agree to the processing of this information for the purposes and ways described in this Privacy Statement including the transfer of your personal information outside of the European Economic Area to countries including but not limited the United States.

- We collect personal information you supply when: (a) you ask us or one of our affiliated companies, VINAREX agents ("**Affiliates**") 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 Affiliates; or (c) you otherwise submit personal information to us, our Affiliates or others;
- We collect and generate personal information about you and your transactions with us or our Affiliates;
- We collect personal information about you from a variety of third party sources such as our business customers, government agencies and consumer and credit reporting agencies and other suppliers of information to assist us in providing you with the products or services requested or to assist us in running our business;
- We collection personal information when we are required to do so by law and as part of compliance programmes, in particular those related to anti-money laundering and preventing criminal and fraudulent activity;
- We collect personal information about the domain and host from which you access the Internet, your computer's IP address, 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 may collect and retain your bank, payment card and other payment details when you use our services and for use in future transactions and services; and
- We collect personal information on your online activity as described in the paragraph below titled "**COOKIES AND INTERNET TECHNOLOGY.**"

The personal information we collect includes but is not limited to name, address, and telephone number, information about the form of identification used to send or receive a transaction (where we are required by law) 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 and your computer's IP address and other online activity details.

### **USE OF INFORMATION**

We use the personal information we obtain about our customers for the following activities

- To provide, deliver and assist us in providing, managing and delivering any products and services to you (including money transfers, payment services, prepaid cards loyalty programmes, and other VINAREX products or services) and to help us improve and develop these services;

- To send you and keep you informed about commercial communications, subject to any choices you have made, about VINAREX or third party products and services, loyalty programmes or other updates;
- To verify any of the information you provide in order to effect, administer and enforce transactions, to manage our customer relationships, to confirm your eligibility for any services, or products you apply for, and to maintain accuracy of our records;
- To comply with legal and regulatory obligations including those aimed at preventing money laundering and related criminal or suspected criminal activity;
- If you apply to become a VINAREX Agent, we will use the personal information you provide to consider your application and verify your suitability and eligibility to be an agent;
- To allow you to receive the best experience using this website including to store your preferences, passwords and other information and track activity on our website; to better understand the effectiveness of our promotional campaigns; to determine whether you came to our site from a banner ad or an affiliate website; to deliver information specific to your interests on additional websites, to determine whether you've acted on our promotional messages; and
- We will also use personal information about you to improve the running of this site and to improve customer experience and the operation of our business.

## **COOKIES & INTERNET TECHNOLOGY**

We use internet technologies like cookies and web beacons for a variety of purposes, including, but not limited to, those identified below.

- To assist us in providing services to you;
- To allow you to change web pages during your visit without having to re-enter your password;
- To temporarily track activity on our website;
- To determine whether you came to our site from a banner ad or an Affiliate website;
- To deliver information specific to your interests on additional websites; or
- To identify you when you visit the website, to personalize the content of the website for you and to assist you in carrying out transactions and accessing account information.

We will only read or write cookies based on your preference level, (**note: cookies set prior to you changing your preference level are maintained on your computer, to remove them please refer to your browser settings**). If your browser does not support JavaScript you can find out about the cookies used on our sites and can only manage the use of cookies through your web browser settings. Please note that if you disable all cookies on your browser, this will limit the features of this site and may impact the ability to complete your transaction.

## **INFORMATION WE DISCLOSE**

We may disclose personal information to the following:

- Companies which help us run or improve the running of our business or which help us deliver products and services to you;
- In order comply with legal, regulatory, security and processing requirements, government and foreign government requirements applicable to us, our Affiliates or service providers, including but not limited to anti-money laundering laws;
- To organizations which help us process transactions, validate customer information, and help us prevent debt, fraud, theft or loss;
- As permitted or required by any applicable laws and regulations

VINAREX and our affiliates worldwide may disclose your personal information, including without limitation your name, customer ID number, address, transaction patterns and bank account information, (i) if we are required to do so by domestic or foreign law or legal process or (ii) to law enforcement authorities or other government officials (including those in this country, the United States or elsewhere) for purposes such as detecting, investigating, prosecuting and preventing crimes, including money laundering and related criminal activity, and the recipients may further disclose the personal information for these and other related purposes.

## **CONFIDENTIALITY AND SECURITY**

We endeavor to maintain physical, technical and procedural safeguards that comply with applicable government laws and regulations to guard 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 VINAREX.

## **PERSONAL CHOICE**

Where you have provided us with your consent to use, store or disclose your information, you have the right to withdraw your consent at any time by using the contact details below. If you do withdraw your consent, we will cease using that information unless we are required to continue to do so by law.

VINAREX maintains your choice and transaction history based on our record retention policies. If you do not perform another transaction within the retention time period, your personal information, as well as your choice will be removed.

## **ACCURACY OF INFORMATION**

You may request (by contacting us in the manner set out below) details of the personal information we hold and request us to correct or erase any erroneous or out-of-date personal information. We reserve the right to independently verify claims made. To protect your privacy, we will also take reasonable steps to verify your identity before making any corrections. Where permitted by law, we reserve the right to assess a service charge for providing you any information in connection with your request.

## **EXTERNAL WEB SITES**

VINAREX's Web site may be linked to or from third party Web sites. VINAREX is not responsible for the content or privacy practices employed by Web sites that are linked to or from our Web site.

## **CHANGES**

VINAREX reserves the right to modify this Privacy Statement. Updated Privacy Statements will be posted at this Web site when amendments occur. We urge you to review this Privacy Statement when you visit to obtain the most current statement. You may change your choices at any time.

## **CONTACT US**

If you have any questions or queries, please visit [contact us](#) section on our website.