



GLOBAL PRIVACY NOTICE
LAST UPDATED: APRIL 1, 2022

MoneyGram is a leading global financial technology company that provides innovative money transfer and payment services to millions of consumers around the world. We are committed to safeguarding the privacy of your Personal Information. This Privacy Notice describes our data privacy practices and policies when you interact with us, including how we collect, use and share your Personal Information in accordance with applicable laws and standards of ethical conduct. If our practices and policies change, we will update this Privacy Notice.

A “data controller” determines how and why a personal data will be used by an organization.

This Privacy Notice applies to **MoneyGram Payment Systems, Inc.**, a wholly owned subsidiary of MoneyGram International, Inc. and its affiliates and subsidiaries world-wide (collectively “**MoneyGram**,” “**MoneyGram Group**,” “**us**,” “**our**,” “**we**”).

The bulk of our money transfer services, and business activities are conducted under MoneyGram Payment Systems, Inc., a U.S. entity located at 1550 Utica Avenue South, Suite #100, Minneapolis, MN 55416, U.S. (“**MPSI**”). Most typically, MPSI will be the “*data controller*” in relation to any Personal Information provided to us anywhere in the world whether in-person at our agent locations, or via email, phone, or via our website or mobile application, unless we have another local MoneyGram licensed entity. This means MPSI is responsible for deciding how it will hold and use the Personal Information about you.

However, depending on your location and how you may interact with us a different MoneyGram entity may be the “*data controller*.” For example, if you use our money transfer services in the European Union (“**EU**”), you will be interacting with **MoneyGram International SRL**, a Belgium entity with the registered address at Rue Joseph Stevens BE-1000 Brussels, Belgium. In such instances, MoneyGram International SRL will be the “*data controller*” of your Personal Information collected in the EU.

For a list of the main entities that are “*data controllers*” depending on your location and interaction with us, please [click here](#).

SCOPE OF THIS PRIVACY NOTICE <i>This Privacy Notice applies when you interact with MoneyGram, anywhere in the world. If you live in the United States, please see our U.S. Privacy Statement. For California residents, please see our California Residents Privacy Notice.</i>	This Privacy Notice applies when you interact with MoneyGram anywhere in the world. For example, this Privacy Notice applies when you: • Use any of MoneyGram’s services, either directly or through our agents, mobile applications, or websites; • Interact with MoneyGram on social media; • Contact MoneyGram’s call center; or • Apply to become a MoneyGram agent. Our website may contain links to other Internet websites. When clicking on a third-party advertising banner or certain other links on our website, you will be redirected to such third-party websites. We are not responsible for the privacy policies of other websites or services. In collecting Personal Information, we always abide by applicable laws and regulations. We do not provide services directly to children or collect their Personal Information. By using or navigating our website or any product or service offered by us (collectively, the "Services"), you acknowledge that you have read and understand, this Privacy Notice. We encourage you to review and check our website regularly for any updates to this Privacy Notice. We will publish the updated version on our website.
OUR DATA PROTECTION PRINCIPLES <i>We use your Personal Information in accordance with applicable laws and standards of ethical conduct.</i>	“Personal Information” means any information that enables us to identify you or the other party of your interaction with us, directly or indirectly, such as name, email, address, telephone number, or any form of identification number. We are committed to complying with applicable data protection laws and will ensure that Personal Information 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.

PERSONAL INFORMATION WE COLLECT <i>When you interact with us, here are the type of Personal Information that we may collect about you.</i>	The types of Personal Information we collect will vary based on your relationship or interaction with us. We collect your Personal Information, for example, when you use our Services, contact us, access our website or mobile application, or join our loyalty programs, and may use it along other information collected or generated during our relationship with you. Depending on your interaction with us, we may collect and process the following Personal Information: • Personal details, such as your name, residential and/or business address, e-mail, telephone number, date of birth, gender, images, marital status, country of citizenship, and government or national identification numbers; • Transaction and financial details, such as money transfer data relating to you and your beneficiary, bill pay details as well as bank and credit information; • Business related information that helps us provide our services to you, such as membership in our loyalty programs, how you use our Services, employer information, permissions to contact, or your marketing choices; • Technological information, such as IP address, browser and device information; CCTV data; mobile application usage data; information collected through cookies, pixel tags and other technologies; demographic information and other information provided by you that may or may not reveal your specific identity; and • Compliance information, such as may be requested by law enforcement or pursuant to our compliance procedures to comply with legal obligations such as fraud prevention, anti-money laundering and sanctions.
WHY WE PROCESS PERSONAL INFORMATION <i>We collect and process personal information so we can interact with you.</i>	We collect and process Personal Information so we can: • provide you with our Services, • market our Services to you; • operate and grow our business; • answer your inquiries and agent applications; • comply with our compliance and legal requirements, including law enforcement and other governmental requests; and

	• interact with our consumers, service providers or agents, as appropriate. You are not required to provide Personal Information to us, but if you don't, we may not be able to provide you with our Services, answer your inquiries, or process your applications.
HOW WE COLLECT PERSONAL INFORMATION <i>We collect personal information directly from you, and from other sources.</i>	We may collect Personal Information in a variety of ways, including: • <u>Directly from you:</u> For example, when you interact with us, such as when you use our Services, call our call center, complete online forms, register for our loyalty and reward programs, or apply to become an agent. If you provide information about someone else, you represent that you have permission to do so. • <u>Indirectly from you:</u> For example, when you create a MoneyGram account on any of our platform, use our Services, access our website or download our mobile application, we collect information about you such as IP address, device location, browser, phone or device information via cookies and similar technologies. For details on how we collect Personal Information via cookies and similar technologies, please see our Cookie Notice available at www.moneygram.com. • <u>Other sources:</u> For example, service providers, vendors, and other third parties; public record sources (federal, state or local government sources); information from our affiliates and subsidiaries; social media platforms; information from our partners or agents, depending on our relationship with them for the purposes listed in this Privacy Notice and at all times in accordance with applicable laws.
PURPOSES FOR WHICH WE PROCESS PERSONAL INFORMATION <i>We use Personal Information for our legitimate business interests and other related purposes as permitted by applicable laws.</i>	We use Personal Information you provide us, or we collect about you for the following purposes as permitted by applicable laws: • For the performance of a contract with you, such as sending you transactional and other administrative messages when you request money remittance services; to complete your transactions or other requests made by you; to respond to and process your queries or inquiries; and to send or contact you as necessary in connection with our performance of a contract; • To comply with a legal or regulatory obligation, such as to monitor and prevent fraud, money laundering, or prohibited or illegal activities; to

	respond to court orders and legal investigations; to respond to requests from public and governmental authorities; to cooperate with law enforcement; or for other legal reasons as applicable. • To market our Services to you, such as to send you marketing communications in relation to our Services including offers, coupons or incentives we believe may be of interest to you subject to applicable law when you provide your consent to the processing. We may also invite you to participate in sweepstakes, contests and similar promotions, and may use your Personal Information to administer these activities. These marketing communications may come from us directly, or through our affiliates or third parties, including our agents who facilitate transactions on our behalf. You have the right to withdraw consent to electronic marketing at any time by following the unsubscribe instructions. • To pursue our legitimate interest pursuant to applicable laws, such as using your Personal Information collected when you use our websites or mobile Apps to analyze and improve our products, services, and operations; to personalize your experience when you use our Services; provide customer service; help protect the security and integrity of our technology and systems; enforce our terms and conditions; and to protect our rights or property, and that of our affiliates, you or others. • Other purposes as permitted by applicable laws: where you have provided your consent to the processing your Personal Information. We use your Personal Information only as consented by you or as otherwise permitted by applicable laws.
HOW WE SHARE AND DISCLOSE PERSONAL INFORMATION <i>We share and disclose information with our affiliates, vendors, and other third parties.</i>	We may share and disclose Personal Information for any of the purposes listed in this Privacy Notice with: • Our subsidiaries and affiliates in accordance to an intracompany data sharing agreement we have in place with them; • Contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep Personal Information confidential and use it only for the purposes for which we disclose it to them;

	• Buyers or other successors in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets; • Third parties to market our products or services to you if you have consented to, where required by applicable law, and have not opted out of these disclosures. We require these third parties to keep personal information confidential and use it only for the purposes for which we disclose it to them; and • Our agents and business partners, such as Facebook, to operate and grow our business, including to market to potential new customers; with all of whom we have an agreement in place. We may also disclose your Personal Information: • To comply with any court order, law, or legal process, including to respond to any government or regulatory request; • To enforce or apply our Terms of Use, Terms and Conditions or any other agreement or understanding may have with you; and • If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of MoneyGram, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction. We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.
OUR INFORMATION SECURITY STANDARDS <i>We are committed to using appropriate organizational, technical and administrative measures to protect Personal Information.</i>	We use the appropriate organizational, technical and administrative measures to maintain the security of your Personal Information and to protect against the destruction, loss, alteration, unauthorized disclosure, or access to Personal Information under our control. We employ the appropriate techniques and security measures to protect our systems and facilities. For example, when you provide your sensitive Personal Information, such as a bank account information or social security number, the information is encrypted and protected in our systems. We also take preventive measures to restrict access to Personal Information to only those who have need to know, such as our employees, services providers,

	agents, partners and other third parties, as applicable. All who have access to, or are associated with, the processing of Personal Information are contractually obligated to respect the confidentiality of your Personal Information, implement the appropriate security standards and abide by applicable data privacy standards and laws. Although our information security standards conform to applicable industry standards and data privacy and security requirements, we make no claim of warranty as to the security or impenetrability of MoneyGram's systems under unusual circumstances or future sophisticated attacks. You also play an important role in protecting your Personal Information. Please safeguard your account username and password and do not share them with others. If we receive instructions using your login information, we will consider you have authorized the instructions. You agree to notify us immediately of any unauthorized use of your account or you have reason to believe that your interaction with us is no longer secure.
YOUR MARKETING CHOICES <i>You have control over the marketing communications you receive from us.</i>	With your consent, and/or as allowed by applicable law, we may contact you (by email or SMS text) to market our Services to you. Such marketing communication will only be sent to you if you use our Services, opted-in to receiving marketing communication from us, or when you create your profile on our website or mobile application, and you have not withdrawn such consent, or there is another legitimate basis to send such communication. You can opt out from receiving marketing communications from us at any time by: • Updating your choices on your MoneyGram profile; • Clicking on the "unsubscribe" link at the bottom of a MoneyGram marketing email; • Replying "STOP" to a text or SMS message; or • Contacting us at: privacyprogramoffice@moneygram.com. We will respond to your request as soon as reasonably practicable or required by applicable law. Please note that if you opt-out of receiving marketing-related communications from us, we may still send you transactional or administrative messages.

ACCESSING YOUR PERSONAL INFORMATION

You have the right to access the Personal Information we hold about you.

Under certain circumstances, you may have the right to access your Personal Information as permitted by applicable laws. We will respond to your request without undue delay in accordance with applicable data protection laws and applicable rules and regulations.

Subject to the verification of your identity, you have the following data subject access rights:

- **Right of access to your Personal Information** – you have a right to know if we are processing your Personal Information and for what purposes free of charge.
- **Right to have inaccurate Personal Information corrected** – you have the right to ask us to correct information about you that is inaccurate, incomplete or out-of-date.
- **Right to have your Personal Information erased** – in some circumstances you have the right to ask us to delete certain information about you. This right is not absolute and can only be exercised in accordance with applicable laws.
- **Right to restrict processing of your Personal Information** – in certain circumstances, you have the right to restrict or object to certain uses of information we hold about you.
- **Right to data portability** – in certain circumstances you have the right to request to receive a copy of your Personal Information in a commonly used electronic format or have it transferred to another third party where it is technically feasible. Certain fees may apply.
- **Right to object to the processing of your Personal Information** - wherever we use legitimate interest as the ground to the processing your Personal Information you can object to our use of it.
- **Right not to be subject to a decision based solely on automated processing** – none of our activities constitute decisions based solely on automated processing, as defined in Article 22 of the GDPR.

To exercise any of your data subject access rights described above, you may submit your request to us by either:

- Emailing us at privacyprogramoffice@moneygram.com; or
- Visiting www.moneygram.com and click on the “Contact Us” link.

We will endeavor to respond to your request within 30 days, but our response time may vary depending on the laws and regulations applicable to your

	request, and in some circumstances, we may be entitled to extend this period with notice to you. We will comply with your request to the extent required by applicable laws. Where you believe that we have not complied with our obligations with respect to your data subject access rights, you have the right to make a complaint to a relevant Data Protection Authority or through the courts.
HOW LONG WE KEEP PERSONAL INFORMATION <i>We keep Personal Information only as long as necessary under legal and regulatory requirements and our business needs.</i>	The Personal Information we collect or is provided to us is used for different purposes and is subject to different standards and regulations. In general, Personal Information is retained for as long as necessary to provide you with the Services you request, to comply with applicable legal, accounting or reporting requirements, and to ensure that you have a reasonable opportunity to access your Personal Information. To determine the appropriate retention period for Personal Information, among many factors, we consider the applicable legal requirements, the purposes for which we process your Personal information, our business needs, information requests related to investigations, reviews and litigations, and the potential risk of harm from unauthorized use or disclosure of your Personal Information. For example, for: • Legal and Regulatory Requirements. We retain Personal Information and transactional data for those periods required to comply with all retention and reporting obligations under applicable laws, including without limitation commercial, tax and anti-money laundering laws and regulations. • Customer Service (administration of customer relationship, complaint handling, etc.). We may process and retain your Personal Information for as long as we have an on-going relationship with you. Once our relationship has ended (for example because the Services have been delivered, or you have exercised your right to withdraw from the contract), we will, subject to any retention requirements under applicable laws, erase or anonymize your Personal Information. • Marketing. Personal Information provided to us for marketing purposes may be retained until you opt out or until we become aware that any such data is inaccurate provided you do not have other on-going relationship with us.

	In some circumstances, we may anonymize your Personal Information (so that it can no longer be associated with you) for research or statistical purposes, in which case, we may use this information indefinitely without further notice to you.
JURISDICTION AND CROSS-BORDER DATA TRANSFERS <i>When you interact with us, your information may be sent to a country other than your own, including the United States, for processing and storage.</i>	We are based in and operate from the United States. Most of the back-office support services and data storage servers for our affiliates and subsidiaries world-wide are located in the U.S., unless required otherwise. In addition, we have customer support call centers located in different countries. For these reasons, Personal Information collected in one country may be transferred to the U.S., or to a different country, for processing or storage. In all these instances, we have taken appropriate safeguards to comply with applicable data protection laws, including the European Union’s personal data transfer restrictions outside the European Economic Area, by putting in place an intracompany data processing and protection agreement for cross-border transfers of Personal Information within the MoneyGram Group of companies, with EU’s Standard Contractual Clauses added for Personal Information that is subject to EU’s General Data Protection Regulation. When you interact with us, you understand that your Personal Information may be transferred to a country other than your own, including to the U.S., for processing and storage. You also understand and that data protection rules of other countries may be different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your Personal Information.
PRIVACY RELATED COMPLAINTS PROCEDURE <i>We take your privacy seriously and have created a process by which you can formally file a complaint.</i>	If you believe that we have not complied with our obligations under this Privacy Notice or applicable data privacy and protection laws, you have the right to file a complaint with the appropriate Data Protection Authority or courts. Although not required, we encourage you to let us know about any privacy related complaint you might have against us, and we will respond in line with our complaints’ procedure – our contact details are set out below. Privacy related complaints or concerns can be submitted to our privacy team: By email at: privacyprogramoffice@moneygram.com By post to: MoneyGram Payment Systems, Inc. <u>Attn:</u> Global Data Protection Officer 2828 N. Harwood Street

15th Floor
Dallas, TX 75201
U.S.A.

Online at: www.moneygram.com and click on the “Contact Us” link.
If you are located in the EEA, please submit your complaint as follow:

By email at: privacyprogramoffice@moneygram.com

By post to: **MoneyGram International SRL**

Rue Joseph Stevens BE-1000 Brussels, Belgium

Online at: www.moneygram.com and click on the “Contact Us” link.

Upon receipt of your complaint, we will send you an acknowledgement without undue delay and address your complaint within thirty (30) days unless an extension is required. Where an extension is required, we will let you know as soon as possible within the 30 days noted above including our reasons for the extension.

In we reject your complaint, we will provide you with a written explanation for our rejection.

If your complaint is accepted, it will be addressed in accordance to our complaint procedure to your reasonable satisfaction within the 30 days noted above unless an extension is requested.

If the matter is not resolved to your reasonable satisfaction, or you have concerns regarding the handling of your complaint, you have the right to file a complaint with the appropriate Data Protection Authority or courts.

For all other complaints or concerns about our Services that are unrelated to privacy, please contact us at customerservice@moneygram.com.



CONTACTING US

You can reach us at the following contact details:

In General: If you have questions about this Privacy Notice or our privacy practices, please contact our Data Protection Officer at DPO@MoneyGram.com

or:

MoneyGram Payment Systems, Inc.

Attn: Data Protection Officer

2828 N. Harwood Street

15th Floor

Dallas, TX 75201

U.S.A.

In the EEA: If you live in the EEA and have questions about this Privacy Notice or our privacy practices, or would like to access your information, please contact our EU Data Protection Officer at

DPO.MoneyGram@twobirds.com or:

Bird & Bird DPO Services SRL

Attn: Data Protection Office

Avenue Louise 235 box

11050 Brussels

Belgium

In the UK: If you live in the UK and have questions about Privacy Notice or our privacy practices, or would like to access your information, please contact our UK Data Protection Officer at

DPO.MoneyGram@twobirds.com or:

Bird & Bird DPO Services SRL

Attn: Data Protection Office

Avenue Louise 235 box

11050 Brussels

Belgium