

# PRIVACY POLICY US - INDIVIDUALS

U S P R I V A C Y P O L I C Y

THIS PRIVACY POLICY AND NOTICE IS  
INTENDED FOR NON-CORPORATE  
CUSTOMERS OF TRANSFERMATE INC.

**If You are not resident in the United States or if You are a US Corporate Entity, You should click here for the applicable Privacy Policy.**

## **Gramm-Leach-Bliley-Act Privacy Policy and Notice**

Words not defined here shall have the meaning set out in the Transfermate Terms and Conditions ([here](#))

### **1. Definitions**

“We”, “Us” or “Our” mean Transfermate Inc.

### **2. Introduction**

The Gramm-Leach-Bliley-Act and Customer’s Non-Public Information.

The Gramm-Leach-Bliley Act (the “GLBA”) requires companies that collect non-public information (such as telephone number, address, date of birth, occupation, and social security number) from its customers also provide them with a Privacy Notice relating to the specific use and disclosure of such information. All customers of TransferMate, have the ability to “Opt-out” of non-public information and may do so anytime by following the steps outlined in the Section below entitled “A Customer’s Opt-Out Right”.

TransferMate understands our customer’s privacy is important. The Firm values our relationship with every customer and has always been committed to protecting the confidentiality of all non-public personal information (“NPI”). This Policy serves simultaneously as our Privacy Notice and explains why we collect NPI, what we do with NPI, and how we protect our customer’s privacy. This Policy should be read in conjunction with other related policies and applies to all business units within the Firm, including all representative offices, branches, agents and subsidiaries thereof and to all TransferMate employees and workers, including staff of controlled subsidiaries, agency workers, consultants and contractors (collectively “Employees”).

### **3. Categories of Non-Public Information That Transfermate Collects From the Customer**

The information we collect from the customer (“non-public information” or “NPI”) may include:-

- 1. Telephone number, address and/or email address, banking information, Social Security Number, date of birth, citizenship, nationality, occupation, copies of photographic identification, and incorporation documents.
- 2. Information regarding a customer’s transactions with us, such as transaction history, transaction amounts, purpose of each transaction, beneficiary contact and bank account information.
- 3. Additionally, as well as information about a customer’s interactions with our websites, we collect information that cannot be used to identify or contact the customer, such as traffic pattern information and transactional information on the Transaction Service. Demographic information regarding, for example, user IP addresses where they have been clipped or anonymized; browser types, and other anonymous statistical data involving the use of our website will be collected by the Firm.

#### **4. How Transfermate Collects Non-Public Information**

We collect personal information, for example, when the customer:-

- Creates a profile or synchronizes information on our website; and
- Provides us with their contact information, as well as beneficiary information

#### **5. Who Transfermate Discloses Non-Public Information to**

Customer information may be shared between our associated companies and third parties for the provision of foreign exchange services. TransferMate, does not sell, publish or freely give away NPI or transactional information. All customer NPI is treated strictly in accordance with the governing laws of the United States and individual State laws.

#### **6. How Transfermate Uses and Discloses Non-Public Information Collected**

NPI is collected to meet both internal and external compliance requirements, and to allow us to open a foreign exchange account for customers to be in a position to commence business. Traffic pattern information is used to monitor pages accessed or visited while enabling the Firm to better meet the requirements and needs of our customers. Transactional information reflects the business a customer engages into with Transfermate. This also provides a historical record of business activity which is necessary as a means of monitoring and mitigating money laundering and terrorist financing, as well as enabling us to keep up to date with our customer’s foreign exchange needs.

Transfermate may use customer NPI internally for the purposes of furthering our business, which may include analyzing customer information, matching customer information with the information of others, processing transactions, maintaining accounts, resolving disputes, preventing fraud, verifying a customer’s identity and performing customer due diligence.

The Firm may also use and disclose NPI to:

- - 6.1. Correct technical problems or malfunctions in how we provide our products and services to the customer and the processing of that information;
  - 6.2. Protect our rights and property and the rights and property of others;
  - 6.3. Take precautions against liability;
  - 6.4. Respond to claims that a customer's information violates the rights or interests of third parties;
  - 6.5. Comply with law or respond to judicial process; and
  - 6.6. Regulatory or law enforcement agencies or for investigations on matters related to public safety, to the extent permitted by applicable laws or regulations.

## **7. A Customer's Opt-Out Right**

Other than those disclosures permitted by law, A customer may restrict NPI sharing with certain third parties, and may opt-out at any time.

If a customer wishes to "opt-out" of information sharing, she must:-

- Send an email to Transfermate at [uscustomerservice@transfermate.com](mailto:uscustomerservice@transfermate.com) with the subject line "Opt Out" and indicating in your message that you wish to opt-out of information sharing with third parties, and;
- Complete, print and submit the attached Opt-Out Form and send via overnight or registered mail to: Transfermate, Inc., 333 North Michigan Avenue, Suite 915, Chicago, IL 60601

The Customer's opt-out choice will become effective upon our receipt of the form.

## **8. How TransferMate, Protects Customer Information**

The Firm maintains administrative, electronic, and technical safeguards that comply with both federal and state regulations; and that are designed to protect the confidentiality and security of a customer's NPI. We also restrict access to NPI to those employees who have a legitimate business need for the information.

## **9. Data Security Breach Notification**

In the event of a data security breach that requires us to notify customers, TransferMate, will send notification by email. Customers are therefore obliged to keep a registered email address current. Customers are required to promptly notify us of any change in their email address on record by contacting [uscustomerservice@transfermate.com](mailto:uscustomerservice@transfermate.com) and providing an updated email address and contact information. A customer's continued use of the site and the Firm's services constitutes consent to receive electronic notice in the event of such a breach.

## **10. Former Customers**

NPI of TransferMate's former customers will be treated as described in this policy and notice.

## **11. Review of this Policy Notice and Change**

Unless otherwise authorized by TransferMate's, Board of Directors, the North American Compliance Manager will annually review this GLBA Policy and Notice, as well as direct any material changes to be made.

## **12. Notice of Intent to "Opt Out"**

Please find our Notice of Intent to "Opt Out" [here](#).