

# Travellex Privacy Policy

## 1. Introduction

This Privacy Policy is issued by Travellex Japan K.K (“Travellex” “us” “our” or “the Company”), the owner and operator of this website <https://www.travellex.co.jp/> (“Website”) in accordance with all data protection laws of Japan, including the amended Act on the Protection of Personal Information (Law No. 57 of 2003, as amended) (hereinafter referred to as the “Act”).

Please read this Policy carefully. If you subscribe to, or have purchased, Travellex products and services (instore, online or via ATMs), you visit our websites or you download and use our mobile apps or services we provide within mobile device wallets or other third-party applications, this Privacy Notice will apply.

Travellex recognizes the importance of safeguarding the personal information (as defined under the Act) of its customers. This Privacy Policy sets out the basis on which any of your information will be collected, stored, and used by us and reflects Travellex’s commitment to maintain the confidentiality of personal information. It will apply to any personal information you provide to us, including but not limited to, the personal information provided to us through the Website or when you purchase Travellex products and services (instore, online or via ATMs).

## 2. Collection of Personal Information

You may be asked by phone, email, in-store and online to provide us with your personal information (including but not limited to your name, phone, postal address, email address, gender and details of your visits to the Website). For example, we may collect your personal information when you:

- a) provide information on the online ordering screen of the Website;
- b) conduct in-store transactions with Travellex;
- c) sign up to receive marketing communications from Travellex or
- d) participate in Travellex prize draws, competitions, or online surveys.

## 3. Type and Scope of Personal Information

The information we may collect and handle includes: Full name, phone number, date of birth, email address, nationality, copies of identity documents or a record of the document type and ID number, address, use of fund details and other information required by law for foreign currency exchange or/ and for the purpose of provision of service.

## 4. Sensitive Information

We do not collect, use or provide to a third party any sensitive information (meaning the “personal information requiring special care” and information on your membership in a labor union, family origin, registered domicile, healthcare, and sex life among these, excluding the matters falling under the category of the “personal information requiring special care”), except in cases such collection, use or provision is permitted under the applicable Guidelines. We handle the sensitive information with extreme caution so as to avoid any unauthorized collection, use or provision.

## 5. How We Collect Personal Information

- We may ask you to complete a form or allow us to take copies of your documents when you visit our bureaux in person
- We may ask you to fill an online form when you transact with us on our website
- We may ask you to provide your name, contact and/or other information when we handle inquiries from you
- We may also process certain information about you by automated means, such as cookies and web beacons, whenever you visit our Sites or when you use the Travelex Services and how you use them.
- When you download our mobile app or access our services from a mobile device we may collect personal information from you such as, your name, email address, user name, password, mobile device information and system (for example android or IOS) and your geo-location. Dependent on your marketing and cookies preferences and your geo-location settings, we may present and display to you in the app targeted marketing and advertising messages, or collect information about how you use the app in order to improve app performance and our digital online services.

## 6. Use of Personal Information

We use your information for the following purposes:

### Where we have your consent

- sending you Travelex's market commentaries, newsletters or similar materials;
- promoting and marketing our products and services to you and informing you of our special offers, promotions or competitions;
- Contacting you via email with short surveys, according to your survey preferences;
- When you are using a mobile device (such as mobile, tablet or wearable device), we may use your precise geo-location to provide you location-based services and provide you with targeted advertisements. You can control your geo-location settings within the app settings or your mobile device settings;
- Enabling us and third-party websites to display relevant and targeted advertisements, based on previous behavior, purchases, or any other relevant information.

You have the right to withdraw your consent at any time. For details of how to do this, see the 'Your rights' section below.

### To provide a service or carry out a contract with you, such as:

- considering whether to accept your orders or provide our products or services to you;
- providing you with service messages, including messages notifying you about changes to Travelex Services or changes to our terms, conditions, and policies;
- enforcing any contract entered into between you and us for the provision of Travelex Services;
- complying with your order or providing the products and services that you request such as;
  - o Foreign currency exchange business (foreign currency delivery, foreign currency wholesale, etc.) and business incidental to this
  - o Cash passport (prepaid card for overseas use) business and related business thereto
  - o Western Union International Money Transfer Service
- responding to queries, complaints or providing you with our general customer service
- researching and developing financial products and services by conducting market research, data analysis, inquiries, etc.;
- ensuring that Travelex Group Companies understand your needs and provide the most suitable products and services to you;
- sending proposals or information about financial products or services.

### Where we have a legal obligation:

- notifying you about changes to our products or services;
- complying with our legal and regulatory obligations (e.g., meeting the disclosure requirements of any law binding on Travelex or any of its branches);
- verifying your identity or transactions which you may enter into with us;
- complying with our legal and regulatory obligations (including fraud prevention, anti-money laundering and sanction screening);
- enforcing or protecting the rights, property, or safety of Travelex, our customers, or others (including, but not limited to, collecting any money you owe us) or
- ensuring that the content of the Website is presented in the most effective manner for you and for your computer.

## 7. Disclosure of Personal Information

We may disclose your personal information where the disclosure is required or authorised by law, for example, disclosing your personal information to our third-party providers or government or regulatory bodies for the purposes of cooperation with them and obtaining your consent would interfere with the performance of the affairs of the government.

We only share your information with third parties in the limited circumstances set out below, for specific purposes. We do not sell your information.

Even where shared, we ensure your information will only be used for the purposes outlined in this Policy:

- In the event that our business is acquired by a third party, or we enter into any kind of merger or other acquisition type, your information where required would be shared with the relevant party.
- We also share your information with a third party when we:
  - have your prior consent to do so;
  - are processing your information through a trusted business partner, who is acting on Travelex's explicit instructions and in accordance with this Policy, confidentiality and levels of security;
- any broker or agent who refers you to us;
- need to comply with the obligations we have to our third party product issuers or third parties providing products or services on our behalf, so that they can process your order or otherwise provide the information, products or services you have requested (please note that these third party product issuers have their own privacy policies and accordingly we cannot accept any responsibility or liability for the handling of your information by such third parties in accordance with such policies);
- We also disclose information about you to law enforcement authorities or other government officials, if we are required to do so by law or legal process, or when we believe disclosure is necessary or appropriate to prevent physical harm of financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity such as financial crime.
- any person acting on your behalf, including your financial adviser, solicitor or accountant, executor, administrator, trustee, guardian or attorney;
- organization to whom we outsource certain functions; or
- the prospective seller or buyer of our business assets.

We may share the following personal information with Travelex Group Companies for the purposes of providing our products and services, and ensuring corporate governance and compliance: Your name, address, telephone number, email address and other information pertaining to you as well as your transaction information such as transaction date, transaction details and transaction amounts. The entity responsible for management of personal information in joint use is Travelex Japan KK. For the address and representative of Travelex Japan KK, please see [here](https://www.travelex.co.jp) [travelex.co.jp](https://www.travelex.co.jp).

We do not sell your information. Even where shared, we ensure your information will only be used for the purposes outlined in this Privacy Policy.

## 8. International Transfers

In providing our services to you, such as fulfilling orders and taking payments, we may transfer the data we collect from you and about you to destinations outside Japan within the [Travelex Group Companies](#) or with our third-party service providers. This is because the information is processed in those other locations for the purposes of completing your transaction or meet our legal and compliance obligations to prevent fraud and validate your identity.

Where we do so, we will put in place security measures and appropriate safeguards to protect your information and ensure that all transfers of your information comply with applicable Data Protection Laws.

In all cases where we transfer information outside Japan, we shall take necessary measures to ensure that appropriate control equivalent to that imposed by the Data Protection Laws are put in place by the overseas recipients. At your request, we will explain the details of such measures taken by us.

## 9. Your Rights

By law, you have a number of rights (subject to certain conditions) when it comes to your information. These include the right to ask us what information we hold about you, and to request us to modify any incorrect details, add missing information, or to delete incorrect information we hold. You also have the right to object to us processing or transferring your personal information if it is processed or transferred in breach of the Data Protection Laws. You can exercise any of these rights by contacting us using the contact details and form referred to in Section 14.

You can obtain further information about your rights, or request a consultation to the Personal Information Protection Commission with regards to how we use your information, and Section 14 provides contact details should you need them.

- The right to be informed of Purpose of Use. You have the right to be provided with clear, transparent and easily understandable information about the purpose for which we use your information and your rights. This is why we're providing you with the information in this Privacy Policy.
- The right of access. You have the right to obtain access to your information held by us. This is so you're aware and can check that we're using your information in accordance with Data Protection Laws.
- The right to rectification. You are entitled to have your information corrected, added or deleted if it is inaccurate or incomplete. You can request that we rectify any errors in information that we hold by writing to us using the contact details below.
- The right to suspension of use. If your information is collected or processed, or transferred to a third party, in breach of certain provisions of the Data Protection Laws, you can request us a suspension of use or deletion of your information, or suspension of third-party transfer of your information.
- The right to withdraw consent. If you have given your consent, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). You can withdraw your consent to the processing of your information at any time by contacting us using the contact details in the section 14.

We strive to ensure that the information we maintain about our customers is accurate, current, and complete. We respond to requests from customers in a timely manner. If you wish to access or correct your personal information or assert any other of your rights, please see the "Contact Information" section of this Policy.

## 10. Protection of Information

We are committed to keeping your personal information obtained from you safe by all technical and organizational and other means. Access to our physical storage locations are strictly controlled. We will take appropriate measures to protect your information from loss, misuse, unauthorized access, falsification, or leakage, and ensure that all information collected through our website is treated securely and in accordance with this Privacy Policy. We do this by applying appropriate technical and organisational measures that meet all of the standards of our regulatory obligations, including regular review measures.

However, when transmitting information over the internet, please bear in mind that no transmission over the internet can ever be guaranteed secure. Therefore, while we endeavour to protect your information, please note that we cannot guarantee the security of any information that you transfer over the internet to us.

## 11. IP Addresses and Cookies

We may collect information about your visits to the Website and your computer (including where available, your IP address, operating system and browser type) through the use of “cookies”. Cookies are small pieces of information that are stored on your computer's hard drive by your browser. The information collected by “cookies” does not identify you as an individual. They help us improve the Website and make it possible for Travelex to identify some of your preferences. On revisiting the Website, Travelex's computer server will recognise the cookie, giving us information about your previous visits.

Most browsers are originally configured to accept cookies automatically, however, you may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. Please note that if your browser is not configured properly or if you alter your browser to disable the acceptance of cookies, you may not be able to use the Website. Unless you have adjusted your browser settings so that it will refuse cookies, our system will automatically issue cookies when you log on to the Website.

## 12. Opting out of marketing, promotions, or related activities

You may be contacted by mail, telephone or email for purposes of customer service or to be notified of related products, promotions, newsletters, customer surveys and similar materials that we may conduct or distribute from time to time in a way agreed by you. If you do not wish to receive any such communications, you may advise us that you want to be removed from the Travelex customer database.

## 13. Retention of your Information

We will keep your information only for as long as is for the purposes set out in this Privacy Policy and to fulfil our legal obligations. Where you are a customer this is usually at least for as long as you remain a customer, to be able to meet our legal and contractual obligations to you, and if necessary, to resolve any disputes. We will not keep more information than we need.

We only retain your information for as long as is necessary for us to use your information as described above or to comply with our legal obligations. However, please be advised that we retain some of your information after you cease to use Travelex services, for instance if this is necessary to meet our legal obligations, such as retaining the information for tax and accounting purposes or for Anti Money Laundering obligations.

When determining the relevant retention periods, we will take into account factors including:

- our contractual obligations and rights in relation to the information involved;
- legal obligation(s) under applicable law to retain data for a certain period of time (for example, our obligations under anti money laundering laws);
- limitations under applicable law(s);
- (potential) disputes; and
- guidelines issued by relevant authorities.

Otherwise, we securely erase your information once this is no longer needed.

## 14. Contacting us

If you wish to contact us about your personal data, please use the details below:

- send an email to [customerservice@travelex.co.jp](mailto:customerservice@travelex.co.jp)
- by mail, addressed to The Data Protection Team, ORIX Akasaka 2-chome Building 6F, 2-9-11 Akasaka, Minato-ku, Tokyo 107-0052 Travelex Japan K.K.
- call us at 03-3568-1061

## Changes to this Privacy Policy

This notice was last updated on the 3 May 2022. We may change the terms of this Privacy Policy at any time without notice. Any changes we make to our Privacy Policy will be posted on the Website. Please do check our Privacy Policy from time to time to take notice of any changes made. By providing us with your personal information, using, visiting, or browsing the Website after we have changed the terms of our Privacy Policy, you will be deemed to have accepted these changes.

## Links to other sites

Our website contains links to other sites. Please be aware that the link may not be protected by this Privacy Policy, comply with the Privacy Policy, or be regulated by Japanese laws.