



WireBarley Privacy Policy

This Policy is effective as of January 27th, 2021, and was most recently updated on January 27th, 2021. WireBarley Hong Kong Limited. (“WireBarley”) is serious about protecting your privacy. This Privacy Policy applies to WireBarley’s Websites (for purposes of this Privacy Policy, “Websites” includes biz.wirebarley.com, our mobile websites, and our mobile applications) and the services associated with it (“WireBarley” or “the Service”). Terms used but not defined in this Privacy Policy have the meanings assigned to them in our Terms and Agreement.

This Policy explains what personal information we collect about you, with whom we share it, and how you can direct us not to share certain information with certain parties. “Personal Information” refers to information such as name and email that can be used to identify you individually directly or indirectly. You should read this Privacy Policy in its entirety. Certain sections may apply differently to residents of different countries or jurisdictions.

If you have questions or concerns regarding this Policy, you should contact us.

Information we may collect about you

It is necessary for you to supply personal data which may be sensitive (for example finance and location etc.) and non-personal data to enable us to perform our services and we may be unable to provide you our services if the requisite personal data are not supplied to us. We may collect the following information about you, your Beneficiary or your Sender, which may include non-public Personal Information:

1. Personal and financial Information you give us as a result of using the Service, such as your name, mailing address, email address, date of birth, telephone number, all or part of your social security number, bank account number, and credit/debit card number. Under certain circumstances we will also collect and save information obtained from scanned copies of official identification documents, including your Passport or Drivers' License;
2. To facilitate our Service, we request certain third party Personal and Corporate Information from you or your mobile device’s address book, such as your Sender’s or Beneficiary’s full name (and the CEOs’ names if the Sender or Beneficiary is a corporate entity), mailing address, email address, and telephone number. We may also collect from you sensitive financial information of your Sender or Beneficiary, including billing account numbers and account balances held at Service Providers, and bank account and routing numbers. Under certain circumstances we will also collect and save information obtained from scanned copies of official identification documents, including but not limited to the corporate entity’s business registration document, Certificate of Incorporation, Annual Return, partnership agreement, its bank statement and directors and shareholders’ list;
3. Information about your usage of the Service, including your Transaction history, and how and to whom you use the Service to send or receive money;

4. Information that we lawfully obtain from third parties, such as identity verification services, electronic database services, and credit reporting agencies;
5. Information that we indirectly obtain from you, such as information about the device, hardware and software you use when accessing the Service, type of device you use, operating system version, device identifier, your IP address, and the pages you access on our Websites, and other websites that you visit prior to accessing the Service. We may combine this automatically collected log information with other information we collect about you. We do this for fraud prevention, to improve our Service, and to improve our marketing, analytics, or website functionality;
6. Recordings of your communications with our Customer Service, including telephone calls and electronic communications;

We may occasionally send you push notifications through our mobile applications marketing messages and other Service or Transaction-related notifications that may be of importance to you. You may at any time opt-out from receiving these types of communications by turning them off at the device level through your settings or through the mobile application settings.

Technologies such as: cookies, beacons, tags and scripts are used by WireBarley . and our marketing, analytics and risk partners or affiliates. These technologies (“Cookies”) are used in analyzing trends, administering the site, tracking users' movements around the site and to gather demographic information about our users as a whole. The information we store in the Cookies we place may include your email address in addition to non-Personal Information. We may receive reports based on the use of Cookies by these companies on an individual as well as aggregated basis.

We use Cookies for Websites functionality, remembering user’s settings (e.g. source & destination country), and for authentication. Users can control the use of cookies at the individual browser level. If you reject Cookies some features or areas of our Websites will be limited. The use of Cookies by our third-party service providers is not covered by this Privacy Policy. You are free to decline these Cookies if your browser permits. We do not have access or control over these Cookies.

As is true of most websites, we gather certain information automatically which may include personal and non-personal information and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We may combine this automatically collected data with other information we collect about you. We do this to improve services we offer you.

We may use mobile analytics software to allow us to better understand the functionality of our mobile software on your mobile device. This software may record information such as how often you use the mobile applications, the events that occur within the mobile applications, aggregated

usage, performance data, and from where the mobile application was downloaded. We may link the information we store within the analytics software to any Personal Information you submit within the mobile applications.

We use Local Storage Objects, such as Flash Cookies ("LSOs") and Local Storage, such as HTML5, to prevent unauthorized or fraudulent sign ups. Third parties, with whom we partner to provide certain features on our Websites or to display advertising based upon your Web browsing activity also use Flash Cookies and HTML5 to collect and store information. Various browsers may offer their own management tools for removing HTML5 LSOs. To manage Flash LSOs please click **[Flash Player Setting Panel](#)**

We partner with a third party to manage our advertising on other sites. Our third party partner may use technologies such as cookies to gather information about your activities on this site and other sites in order to provide you advertising based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by sending us an email requesting for the same. Please note this does not opt you out of being served ads. You will continue to receive generic ads.

Why We Collect Information

We collect Personal and Non-Personal information for the following purposes:

1. To process your Transactions.
2. To verify your identity.
3. To collect payment for your use of the Service.
4. To troubleshoot problems with the Service.
5. To comply with applicable laws and regulations, such as those relating to "Know Your Customer," and anti-money laundering requirements.
6. To detect and prevent fraud and other illegal uses of the Service.
7. To send you marketing notices, service updates, and promotional offers.
8. To collect survey information that will be used to monitor or improve the use of our Service and overall customer satisfaction.
9. To allow our partners to fulfill their promotional obligations to you.

We will retain your account information, including but not limited to your payment source information and Personal Information about you, your Beneficiary, as needed to provide you Service, as required by applicable law, to resolve disputes and to enforce our agreements. We will continue to retain your account information after your account is cancelled as required under applicable law, regulations, and rules.

How We Share Information With Others

We will share your personal information with third parties only in the ways that are described in this privacy policy. We do not sell or rent the information we collect to third parties for their promotional purposes. These companies are authorized to use your personally identifiable information only as necessary to provide these services to us.

Nevertheless, we may share necessary information about you or your Beneficiary (including nonpublic, personal information) with:

1. Specific third-party service providers under contract with WireBarley Hong Kong Limited that help us with our business operations, such as transaction processing, fraud prevention, and marketing. These third parties are prohibited from using your information for their own separate business purposes and have their own security measures in place to ensure protection of the personal data collected
2. In the event of the sale, acquisition or merger of some or all of our assets, your personal information might be a part of the transferred assets. We shall notify you in the event of such an occurrence, as well as any choices you may have regarding your personal information, by placing a notice on our Websites.
3. Law enforcement, government officials or other third parties, but only
 - a. in connection with a formal request, subpoena, court order, or similar legal procedure; or,
 - b. when we believe in good faith that disclosure is necessary to comply with the law, prevent physical harm or financial loss, report suspected illegal activity, or to investigate violations of our User Agreement.

Access To Your Information

You can access, modify, delete or update your personal information submitted on our Websites by logging into your account and changing your preferences, by emailing our Customer Service at hk@biz.wirebarley.com, or by contacting us by telephone or by mail at the contact information listed below free of charge. We will respond to your request to access within a reasonable timeframe. We may back up the personal data or account so deleted as required by applicable and

keep it confidential law unless disclosure is required by Law enforcement and government officials in connection with a formal request, subpoena, court order, or similar legal procedure or that disclosure is necessary to comply with the law, prevent physical harm or financial loss, report suspected illegal activity, or to investigate violations of our User Agreement.

Security

We employ industry accepted standards in protecting the security and confidentiality of the information you submit to us on our Websites. We have provided relevant training to the employees to handle personal data properly. We have also put in place SSL (Secure Socket Layer) encryption technology to protect your sensitive information such as bank account number, credit card number, date of birth and Social Security Number, transmitted through our Websites. We require a username and password from each user who wants to access their information on our Websites. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security. If you have any questions about security on our Websites, you can contact us at hk@biz.wirebarley.com.

Choices You Can Make About Our Use Of Your Information

Applicable laws allow you to restrict the sharing of your Personal Information in certain instances. However, these laws also state that you cannot restrict all types of sharing. Because we have chosen to refrain from certain types of data sharing, the only type of sharing of your personal information that you may restrict is as follows:

1. You may opt-out from promotional emails to you by selecting the “Unsubscribe” function present in each email we send you.

Third party sites

Our Websites contain links to other websites whose privacy practices may differ from those of WireBarley. If you submit personal information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.

Social Media Widgets

Our Websites include Social Media features, such as the Facebook Like button and Widgets, such as the Share button or interactive mini-programs that run on our Websites. These features may collect your IP address, which page you are visiting on our Websites, and may set a cookie to enable the feature to function properly. Social Media features and Widgets are either hosted by a third party or hosted directly on our Websites. Your interactions with these features are governed by the privacy policy of the company providing it.

Changes to this policy

We may amend this policy at any time, and shall notify you by posting a revised version on our Websites. Should we make a substantial change to the manner in which we collect, use, or store Personal Information about you, your Beneficiary, we shall provide prior notice on our Websites, or by email.

Contacts

You can contact us with any questions or concerns at: WireBarley, as follows: **online**; by telephone at 852 3001 5585; or by mail at WireBarley Hong Kong Limited Customer Service, WireBarley Hong Kong Limited 9th Floor, V-Point, 18 Tang Lung Street, Causeway Bay, Hong Kong.