

PAYSEND

PAYSEND FACIAL SCAN POLICY FOR US CUSTOMERS IN SPECIFIC STATES

Last Updated: May 28th, 2024

Applicability

PLEASE NOTE: THIS FACIAL SCAN POLICY DOES NOT APPLY TO YOU IF YOU LIVE IN ONE OF THE FOLLOWING STATES: Alabama, California, Hawaii, Massachusetts, Nevada, New York, American Samoa, Guam, Northern Mariana Islands, U.S. Minor Outlying Islands and VI U.S. Virgin Islands.

Who we are

We're Paysend US LLC. ('Paysend'), a money transfer and payment services provider. This Facial Scan Policy applies to our US customers who live in the following states: Alaska, Arizona, Arkansas, Colorado, Connecticut, Delaware, District of Columbia, Florida, Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, New Hampshire, New Jersey, New Mexico, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Utah, Vermont, Virginia, Washington, West Virginia, Wisconsin, and Wyoming states.

To provide you (our customer) with our services, we may have to verify your identity. We verify your identity in a number of ways, which involve you providing some of your personal data to us, including your Biometric Data ([as set out in our Privacy Notice](#)). This Facial Scan Policy describes how we process your Biometric Data to provide you (our customer) with our services, by specifically explaining how we collect, share and protect your Biometric Data. Using biometric data for verification purposes is an integral part of our process to onboard customers, prevent and detect fraud, and prevent unauthorized access to our customer's Paysend Account thereafter. You are required to verify your identity through our facial scan process in order to use our services. If you do not consent to us using your Biometric Data to verify your identity, you must not use our services.

Why this Facial Scan Policy matters

We take our data protection obligations very seriously. It is important to us that you know exactly what Biometric Data we collect from you, how we collect it, why we collect it, how we process it, and who we are allowed to share it with. This Facial Scan Policy should be read in conjunction with [our Privacy Notice](#), which provides you with information about how we handle personal data generally including personal sensitive data (the latter includes Biometric Data). This Facial Scan Policy shall control in the event of any inconsistencies between its content and the content of other Paysend Policies. Should you have any questions or concerns, please do not hesitate to contact us at dataprotection@paysend.com or through any other contact methods as prescribed in our Privacy Notice.

PAYSEND

What Biometric Data do we collect from you?

We engage the services of specialist third parties (**our Vendors**) that verify your identity on our behalf. You can find the list of our Vendors in [our Privacy Notice](#). Our Vendors may collect data from photos and/or videos of your face and recordings of your voice that may be interpreted as a scan of face geometry or voice print extracted from photos and/or videos submitted by you to us, and any other information from this data that is used to identify you (regardless of how it's captured, converted, stored or shared). This type of personal data is known as **Biometric Data**. Under applicable biometric privacy laws, the Biometric Data may include biometric identifiers or biometric information.

Why do we collect Biometric Data from you?

Broadly, we collect Biometric Data to verify your identity and enable you to access our services securely. Our Vendors collect, capture, obtain, possess, store, use, process, disclose and re-disclose your Biometric Data for the following purposes:

- To verify your identity: by running a comparison between the Biometric Data extracted from the photo or video of your face against the Biometric Data extracted from the identity document that you provide when requested
- To authenticate you and your service usage: by comparing Biometric Data from the image you provided to us when you register for a Paysend Account, or the photo on your identity document, against the Biometric Data from a new photo or video of your face
- To detect or prevent fraud: to determine whether we've previously verified your identity and/or identify signs of coercion or social engineering
- To evaluate the authenticity of images, videos, and identity documents: by detecting whether there's a genuine human or physical document in your photos/videos, and detecting signs of tampering

Keeping your Biometric Data secure

We will handle your Biometric Data under the same strict parameters we apply to the handling of other personal data that we look after including personal sensitive data. Paysend does not profit from your Biometric Data (i.e., does not sell it or lease it) nor uses, processes, stores, receives, transmits, or handles your Biometric Data other than for the purposes and processing prescribed in this Facial Scan Policy.

We will not disclose your Biometric Data outside the parameters of this Facial Scan Policy unless:

- disclosure is required by state or federal law, or municipal ordinance
- disclosure is required pursuant to a warrant or subpoena issued by any court having jurisdiction
- we have your express consent

Where our Vendors request that they may use Biometric Data in an anonymized manner (rendering your Biometric Data no longer identifiable with you), for improving and developing their services, we will agree to this only if and as permitted by applicable laws.

PAYSEND

Biometric Data Retention

Per [our Privacy Notice](#), we will keep your Biometric Data while you are our customer and for three (3) years after your Paysend Account is closed or the maximum period allowed by law, , for any reason (unless you register with us but never use our services in which case your Biometric Data and any other data we hold on you will be permanently destroyed at your request), unless otherwise required by applicable law or legal process.

Your Consent

BY CLICKING ON THE “CONFIRM” BUTTON OR OTHERWISE PROCEEDING TO USE THE SERVICES, YOU CONFIRM AND AGREE THAT YOU:

- i. HAVE READ AND UNDERSTOOD THIS PAYSEND FACIAL SCAN POLICY
- ii. GIVE PAYSEND EXPRESS CONSENT TO PROCESS YOUR BIOMETRIC DATA AND OTHER PERSONAL DATA AS PRESCRIBED IN THIS FACIAL SCAN POLICY AND PAYSEND’S PRIVACY NOTICE
- iii. RELEASE IN FAVOR OF PAYSEND, ANY CLAIMS RELATED TO YOUR BIOMETRIC DATA, PHOTO/VIDEO (INCLUDING AUDIO RECORDINGS)
- iv. ARE NOT ACCESSING PAYSEND’S SERVICES IN ANY JURISDICTION WHERE PROCESSING OF BIOMETRIC DATA IS NOT PERMITTED BY APPLICABLE LAW

You may withdraw your consent at any time by contacting us. Please be aware that withdrawing your consent means that we will not be able to provide you with our services.