

EEA Privacy Policy

Last Updated 18 September 2017

This Privacy Policy applies to Circle customers within the European Economic Area (EEA). Translations of this Privacy Policy are provided for your convenience and can be accessed via the dropdown menu at the top of this page.

If you are signing up for Circle on or after 18 September, 2017, this Privacy Policy shall be effective immediately. If you signed up for Circle prior to 18 September, 2017, this Privacy Policy shall be effective on 18 September 2017, and the Privacy Policy effective until that date can be requested, if necessary.

This Privacy Policy describes how Circle UK Trading Limited (“Circle”) collects, uses, stores, shares and protects your information whenever you use Circle through the website (www.circle.com) or Circle’s mobile applications. We know how important privacy is to our users, which is why we only collect the information we need and will not share your personal information with any third parties unless it is necessary. Even within Circle, access to your personal information is limited to only those employees who require such information to handle matters relating to compliance, identity verification, fraud prevention and customer support.

Circle (including its affiliate entities that may handle your information) complies with the EU-US Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. Circle has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

For the purpose of the UK Data Protection Act, the Data Controller is Circle UK Trading Limited registered office at White Collar Factory, 1 Old Street Yard, London, EC1Y 8AF, UK .

We may change this Privacy Policy from time to time. When we do make updates, we’ll let you know by changing the date above. If it is a big update, we’ll send you a notification or post a notice on our website. If you ever have any questions about changes made to the Privacy Policy, just reach out to [Support](#).

By using Circle’s website or mobile apps, you consent to the practices contained in this Privacy Policy.

1. Information We Collect

What You Directly Provide Us

When you create a Circle account, we'll collect some important details about you such as your name, address, phone number, email, birth date, password, tax ID or equivalent (if applicable) and any other information you provide directly via our website or mobile application.

If you want to link a debit card, credit card or current account, we'll need to collect the card number or IBAN/BIC numbers and related account information. As Circle adds additional features, you may also be prompted to provide additional information.

Sometimes we need to request more information to verify your identity or to meet legal and regulatory obligations. When that is necessary, you will be prompted to provide such information.

In the event that Circle integrates with other platforms, you may be prompted from time to time to grant Circle access to additional information from such platform (or grant such partner platform access to information you have provided to Circle). For example, if Circle implements an integration with a social media platform, you would have the option of linking your account on that platform to Circle in order to streamline the signup process, populate your contact list or other purposes.

In providing personal data of any individual (other than yourself) to us during the use of our Services, you agree that you have obtained consent from such individual to disclose their personal data to use for collection and use.

What is Automatically Collected

There is some information that is automatically collected as you use Circle. This information allows us to deliver cool new features, more easily handle your customer support issues and better protect your account. This information includes:

- **Device Information.** We collect information about your device, including the type of device (Computer vs. iPhone vs. Android), operating system, mobile phone number, browser type and language, and device identifiers (such as IMEI and MAC address).
- **Location Information.** With your permission, we collect your device location so that we can offer you location-based features such as the ability to send funds to nearby Circle users.

- **Contacts.** To make it easier to send money to your contacts, we will - with your permission - collect information from your phone's address book or other contact lists that you grant us access to (for example, your Facebook friends list).
- **Photos, Videos & Other Media.** If you want to attach photos, videos or other media to your payments, payment requests or other communication using Circle, we require access to the photos on your phone. Any photos, videos or other media you attach will be stored and accessible to Circle, but we will never download or store any photos, videos or other media from your phone that aren't attached to payments, payment requests or other communications using Circle.
- **Message Content.** If you include a message with your payments, the content of that message is stored and accessible to Circle.
- **Transactions.** We collect information about your payment activity such as the amount, date, time, recipient for each transaction.
- **Cookies.** Like most mobile apps and websites, we use cookies. Cookies are small data files that we place on your device that allow us to identify you as a Circle user and provide a customized Circle experience. We use both session and persistent cookies when you access our website or content. Session cookies expire and no longer have any effect when you log out of your account or close your browser. Longer lasting cookies, known as persistent cookies, remain on your browser until you erase them or they expire. You are free to decline our cookies if your browser or browser add-on permits, but doing so may interfere with your use of Circle. The help section of most browsers or browser add-ons provides instructions on blocking, deleting or disabling cookies.

2. **Protecting Your Information**

Throughout this policy, we use the term "personal information" to describe information that is associated with you or can be used to identify you. We do not consider personal information to include information that has been anonymised.

We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorised access, disclosure and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centers, and information access authorisation controls. Sometimes in order to better secure your information and use it for the purposes contemplated by this Privacy Policy, certain personal data may be stored with our third party partners and service providers. All of our physical, electronic and procedural safeguards are designed to comply with applicable laws and regulations.

The data that we collect from you will be transferred to, and stored at, a destination in the U.S. and may be transferred and/or stored to other places outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us or for one of our service providers (including affiliate entities of Circle). These staff may be engaged in the fulfilment of our Services and/or the processing of your details and the provision of support services. By submitting your personal data, you agree to this transfer, storing, or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. Third parties may be located in other countries where the laws on processing personal information may be less stringent than in your country.

3. How We Use Your Information

We collect all of this information so that we can provide you with a safe and seamless way to make and receive payments. The information we collect allows us to:

- Deliver the full range of payments and functionality of the Circle product;
- Keep in touch with you - whether it be for providing customer service, notifying you of cool new features that have been added to the mobile apps, or providing security notices or information;
- Verify your identity so that we can prevent fraud or unauthorised activity;
- Improve Circle or add new product features by analysing usage trends;
- Personalise the Circle experience by matching product features to things that we think you specifically might be interested in; and
- Fulfill any other purpose for which the information was collected.

We will never sell or rent your personal information to third parties. We may combine your information with information we collect from other companies and use it to improve and personalise the Services, as well as our content and advertising.

4. How We Share Your Information

Sharing With Third Parties

In order to provide you with the Circle product and meet our legal and regulatory obligations, we may share the information we collect as detailed below:

- If you link a debit card, credit card or current account, we will share your account information with our banking partners so that we can process payments. In order to make adding an account as easy as possible, we've partnered with Plaid Technologies, Inc. ("Plaid"), who may receive your account information during this process. All information shared with Plaid will be treated in accordance with Plaid's own privacy policy, which can be found at <https://plaid.com/privacy>. We also may need to share your information with your own banking institution in order to verify and complete payment transactions.
- In order to prevent fraud, we will sometimes need to share your information with third party identity verification services. This lets us make sure you are who you say you are, by comparing the information you provide us to public records and other third party databases. This may include searches through electronic services such as credit bureaus, but we will not do so in a manner that would have an adverse impact on your credit or credit score.
- In order to improve Circle's functionality, we will sometimes share information with service providers that help us analyse how people are using the app. This allows us to refine popular features and improve or eliminate features people don't use.
- As a regulated financial institution, we may need to share your information with law enforcement or government officials. We will only do this when we are compelled to do so by a specific regulation, subpoena, court order or formal request, or we otherwise believe in good faith that we need to share such information to prevent physical harm, financial loss, or are obligated to report illegal activity.
- Circle allows you to send and receive money with customers of Circle affiliates, including Circle Internet Financial, Inc. and Circle Payments, LLC in the United States. In order to complete these transactions, we will need to share information regarding your account with those other Circle entities in order to complete such transaction and meet their legal and regulatory obligations.
- From time to time Circle may partner with other companies ("Partners") to allow you to send and receive money with individuals that are customers of such Partners and not Circle. In order to complete these transactions, we will need to share information regarding your account (such as name, email address, phone number and date of birth) with the applicable Partner so that they can meet their legal and regulatory obligations. Your information will only be shared with such Partners to the extent you actually transact or interact with customers of such Partner.

- In order to complete third party financial, technical and legal audits of Circle's operations, we may need to share information about your account as part of such review.
- If Circle merges with or gets acquired by another Company, they will have access to the information you have provided to us. If this happens, we will require that the new entity follows this Privacy Policy and will notify you of any such change.
- Circle will share your information with Circle Internet Financial, Inc. (a U.S. entity), Circle Internet Financial Trading Company Limited (an Irish entity) and other Circle affiliated entities as necessary in order to provide you with the best possible product and customer support.
- We will share your information with other third parties if you specifically authorise us to do so.

Sharing With Other Circle Users

In order to make Circle payments about more than just sending money from A to B, we will share additional information with other Circle users, but only to the extent that you give us permission to do so. Note that any information you provide to someone (through a payment, payment request or otherwise) can always be shared by them with others - so use discretion. This information includes:

- **Transaction Details.** At the risk of stating the obvious, when you send someone a payment or payment request, they will be provided with the details of that transaction, including the payment amount, currency, date, time and a unique transaction ID number.
- **Messages & Photos.** If you attach a message or photo, video or other media to a payment, payment request or other communication using Circle, that information will be visible to the person(s) receiving the payment or payment request (and to Circle's support staff). You should know that the recipient(s) of a message or photo (or other media) can always save them - so don't send anything you wouldn't want shared publicly.
- **Your Identity & Photo.** In order for other Circle users to transact with you (sending money, receiving money, requesting money, etc.) they will be able to see your full legal name. If you upload a profile photo or avatar to your account, this will also be visible to other Circle users. If Circle adds additional features that allow you to share more identity information, further information may be shared if you opt in to such features.

- **Location.** If you have your location enabled in your settings, the location from which a payment was initiated may be visible to the recipient. This also lets other users take advantage of the “nearby users” function, which makes it easier for them to send you a payment if you’re nearby and not otherwise in their contacts.
- **Status & Currency.** Other Circle users may be able to see that you have a Circle account. This lets them know they can send you a payment and you will receive it instantly without having to first set up a Circle account. Other Circle users may also be able to tell which currency you have chosen as your default currency. This makes it easier for them to send you the right amount and to know the currency in which their payment will be delivered.
- **Public Sharing of Transactions.** In the future, Circle may give users the ability to share certain payment information through a public feed or social media integration. The information may include sender, recipient, date and time of transaction, avatars, location, media or other information regarding the transaction. If this feature is enabled, you will be able to determine how much information is shared in your account settings.
- **Other Information.** As we add new product features, there may be additional information that is shared with other Circle users. If those new features require sharing any personal information, we’ll always get your permission first and will do our best to allow you to disable such features in your account settings. We’ll also provide information to other Circle users if you specifically request that we share such information.

5. **Liability for Transfers to Third Parties**

Circle works to ensure that customers located in the EEA receive notice of the purposes for which we collect and use your personal information, the types and identities of third parties to which we disclose this information, certain privacy rights of customers (such as the right to access your personal information and your choices for limiting the use and disclosure of your personal information), and how to contact Circle about our practices concerning your personal information.

For more on these topics, please refer to Sections 3 and 4, above (“How We Use Your Information” and “How We Share Your Information”), as well as Sections 6 and 7, below (“How to Change or Delete Your Information” and “Complaints”).

Circle will take steps to remediate any unauthorized use by third-parties and, if found responsible, we have potential liability for any damage caused. We will also make reasonable efforts to accommodate employee privacy preferences, including restricting third-party access to personal information and limiting use for a purpose

that is incompatible with the purpose(s) for which it was originally collected or subsequently authorized by the employees.

6. How To Change or Delete Your Information

If you need to add or change any information, you can just log in to your Circle account and make the change in your settings. If it doesn't look like you can make the change on your own, just reach out to [Support](#) and we'll take care of it.

If you want to close your Circle account, know that as a regulated financial institution we are required to retain certain information you have provided for a number of years.

7. Access to information

If you want to know what information we're keeping on you, check out the categories listed above. Subject to applicable laws, you have the right to access the personal data we hold on you, this can be done by submitting a request to support@circle.com. We may ask you to verify your identity and for more information about your request.

8. Your rights

You have the right to ask us not to process your personal data for marketing purposes by contacting us at support@circle.com. Our Services may contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility for them. Please check these policies before you submit any personal data to these websites.

9. Complaints

In compliance with the EU-US Privacy Shield Principles, Circle commits to resolve complaints about our collection or use of your personal information. Individuals in the European Union with inquiries or complaints regarding our Privacy Shield policy should first contact Circle at compliance@circle.com.

Circle has further committed to refer unresolved Privacy Shield complaints to the Information Commissioner's Office ("ICO"), an alternative dispute resolution provider located in the United Kingdom. Circle is registered with the ICO with the Registration reference number ZA176325. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact or visit the ICO at <https://ico.org.uk/>

for more information or to file a complaint. The services of the ICO are provided at no cost to you.

10. Children's Privacy

Unfortunately, if you're under 13, you can't use Circle. So we don't knowingly solicit or collect information from anyone under 13. If we become aware that a child under the age of 13 has provided us with personal information, we'll delete it immediately.

11. Questions?

If you have any questions about this Privacy Policy, feel free to reach out to [Support](#).