

****PRIVACY POLICY****

Last updated: November 16, 2023

****ABOUT THIS POLICY****

This Privacy Policy ("Policy") applies to the websites located at [remitly.com](https://www.remitly.com), the Remitly mobile applications and through any other programs (including Remitly Research programs), websites, or applications owned and operated by Remitly that direct you to this Policy.

This Policy, together with our [\[User Agreement\]](https://www.remitly.com/home/agreement) (and any additional terms of use mentioned in our User Agreement) applies to your use of our Services.

Where we use other capitalised words and phrases in this Policy (such as Agreement, Profile, Services and Transaction), these have the same meaning as given to them in our [\[User Agreement\]](https://www.remitly.com/home/agreement), unless we have defined them differently in this Policy.

NOTICE TO CALIFORNIA RESIDENTS

Notice at Collection of personal information: We list the categories of personal information that we collect below under "What Personal Data Do We Collect." We collect personal information about you for business and commercial purposes as described below under "How Do We Use or Process Your Personal Data." For more information, including on how to opt-out of the sale or sharing of personal information, please see "US State Privacy Rights" section below.

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****WHO ARE WE?****

Any personal data provided to or gathered by our Services is controlled by Remitly, Inc. located at 1111 3rd Ave, Ste 2100, Seattle WA 98101.

****WHAT PERSONAL DATA DO WE COLLECT?****

The personal data that we collect from you depends on how you interact with us and our products and services. When we say "personal data" or "personal information" we mean any information related to an identified or identifiable natural person. The following are the categories and specific types of personal data or information we may collect:

Basic Identifying Information: Including your full name, postal address, e-mail address, phone number, date of birth, occupation and employer, username or social media handle, or other similar identifiers.

Payment Information: Including your financial instrument details (either debit/credit card) or bank account details.

Government Issued Identification or Records: Including your driver's license, state or country issued identification card, passport (as well as a picture of yourself with your identification documentation), social security number (SSN), records of proof of address, or evidence of how you will fund your Transaction (e.g., bank statement or pay slip).

Device Or Other Unique Identifier Information: Including your device identifier, internet protocol (IP) address, cookies, beacons, pixel tags, mobile ad identifier, or similar unique identifiers. See our [Cookie Policy](<https://www.remitly.com/home/cookies>) for additional information on our use of Cookies.

Geolocation Data: Including information about the location of your device, such as information derived from your device (e.g., based on a browser or device's IP address).

Transaction Information: Including your transaction history/logs (including a unique Transaction reference number), purpose of transfers, relationship with the recipient, and referral rewards.

Recipient Information: Including your recipient's full name, address, phone number, or depending on the disbursement method selected certain financial institution or financial account details such as bank account or mobile wallet account.

Referral Information: Including your contact's name and email address.

User Generated Information or Content: Including your communications with us and any other content you provide us with such as social media profiles, photographs, images, videos, survey responses, comments, product reviews, testimonials, information you provide us for customer service (including chat) and other content.

Technical Information: Including the hardware and software you use to access our Services, network information, internet service provider, operating system, or the type of browser you use.

Internet or Network Activity Information: Including information on your interactions with our Services or Sites or browsing or search activity.

Audio and Visual Information: Including photographs, images, videos, and recordings of your voice (such as when we record customer service calls for quality assurance).

Inferences: Including information we may infer from other information described above.

For California residents, please note that we may collect *Sensitive Personal Information* including social security number, driver's license, state identification card, or passport

number and *Protected Classifications* under California and federal law, including gender and age.

****HOW DO WE COLLECT YOUR PERSONAL DATA?****

We collect personal data about you from various sources. For example, we collect and obtain information:

Directly from you

We collect personal data you provide, such as when you use our Service, create a profile, contact us (including via chat), respond to a survey, interact with us at events, participate in a sweepstakes, contest, or other similar campaign or promotion (including WhyI Send), respond to a survey, post a review, or sign up to receive emails, text messages, and/or postal mailings.

Using cookies and other automatic data collection technologies

When you visit our websites, use our app, open or click on emails we send you, or interact with our advertisements, we or third parties we work with automatically collect certain information using technologies such as cookies, web beacons, clear GIF, pixels, internet tags, web server logs, and other data collection tools. For more information, please see our [Cookie Policy](<https://www.remitly.com/home/cookies>).

From Other Sources

We may obtain information about you from other sources, such as data analytics providers, marketing or advertising service providers, social media platforms or networks, fraud prevention or identity verification service providers, electronic databases, credit reporting agencies, vendors that provide services on our behalf, or publicly available sources.

****HOW DO WE USE OR PROCESS YOUR PERSONAL DATA?****

COMPLY WITH LEGAL OBLIGATIONS

We use personal data to comply with our legal or regulatory obligations, to establish or exercise our rights, and to defend against a legal claim.

Security and Fraud Prevention

We use personal data to detect, investigate, prevent, or take action regarding possible malicious, deceptive, fraudulent, or illegal activity, including fraudulent transactions, attempts to manipulate or violate our policies, procedures, and terms and conditions, security incidents, and harm to the rights, property, or safety of Remitly and our users, customers, employees, or others.

Comply with Applicable Laws

We use your personal data to comply with applicable laws and regulations, such as those relating to "know-your-customer," anti-money laundering requirements, sanctions legislation, and the various associated regulatory rules and guidance in relation to risk investigation, risk scoring, fraud, counter terrorist financing, anti-money laundering, consumer protection and complaint handling.

TO PERFORM A CONTRACT

To Provide Our Services

We use your personal data when you access or use our Services, including to process your Transaction(s), maintain and manage your account, deliver/fulfill promotional offers or rewards (including our referral program), process payments.

Communicating With You

We use your personal data to communicate with you, such as to respond to and/or follow-up on your requests, inquiries, issues or feedback, and to provide customer service.

CONSENT OR LEGITIMATE INTEREST

Marketing and Promotional Purposes

We use personal data for marketing and promotional purposes, such as to send marketing, advertising, and promotional communications by email, text message or postal mail; to show you advertisements for products and/or services tailored to your interests on social media and other websites; and to administer our new customer

promotions, sweepstakes, contests, and other similar promotions.

Analytics and Personalization

We use personal data to conduct research and analytics, including to improve our services and product offerings; to understand how you interact with our websites, mobile apps, advertisements, and communications with you to improve our websites, app, and marketing campaigns (business and marketing analytics); to personalize your experience, to save you time when you visit our websites and app, and to customize the marketing and advertising that we show you; to understand how you use our app and website.

Other Business or Commercial Purposes

At your direction or with your consent, we may process certain personal data to fulfill any other business or commercial purposes.

****WHO DO WE SHARE YOUR PERSONAL DATA WITH?****

In addition to the specific situations discussed elsewhere in this privacy policy, we disclose personal data in the following circumstances:

Corporate Affiliates

We may share personal data with our corporate affiliates, including our parent company, affiliates and subsidiaries. Such corporate affiliates process personal data on our behalf to provide services or in other circumstances with your consent or as permitted or required by law.

Service Providers

We share certain personal data with third parties that perform services to support our core business functions and internal operations. This includes banks, disbursement providers, or other financial institutions completing your transfer or other financial service request (including payment processors), identity verification or KYC service providers, third parties that provide software and tools to send postal mail, e-mails and text messages, or analyze customer data, provide marketing assistance, administer our reviews, investigating fraudulent activity, conducting customer surveys, and outsourced customer service providers.

Third Party Partners

We may share your personal data with third parties that we have partnered with to jointly create and offer a product, service, or joint promotion. We may also share your personal data with our banking or distribution partners in the event we suspect you are violating our terms or engaging in fraudulent behavior as it relates to our business. Their use of your information is not governed by this privacy policy, but by their own respective privacy policies.

Social Media Platforms and Networks

Some of our websites have features such as, plugins, widgets, or other tools made available by third parties that may result in information being collected or shared between us and the third party. For example, if you use our referral feature to refer persons via WhatsApp, Facebook, email, or SMS. Their use of your information is not governed by this privacy policy.

Business Transactions

If we become involved with a merger, corporate transaction or another situation involving the transfer of some or all of our business assets, we may share your information with business entities or people involved in the negotiation or transfer.

Legal Process

We may disclose personal data in response to subpoenas, warrants, court orders, government inquiries or investigations, or to comply with relevant laws and regulations. We may also disclose information to establish, exercise, or protect our rights or the rights of others; to defend against a legal claim; to protect the safety and security of our visitors; to detect and protect against fraud; and to take action regarding possible illegal activities or violations of our policies.

Other Instances

We may ask if you would like us to share your information with other third parties who are not described elsewhere in this Policy.

****WHAT ARE MY PRIVACY RIGHTS?****

Our customers in certain regions of the world have specific data privacy rights based upon the applicable privacy legislation (including but not limited to the laws of Europe or California). We strive to implement the best privacy practices as a standard for all our customers.

Access Your Data & Data Portability

You may request that we provide you a copy of your personal data held by us. This information will be provided without undue delay subject to certain exceptions or limitations, including if such provision adversely affects the rights and freedoms of others.

Correct Your Data / Data Rectification

You have the right to request that we update and correct inaccuracies to your personal data. You can update certain information related to your account by logging into your account on our site or app, as applicable or otherwise contacting us as described in the Exercising Your Privacy Rights section below.

Data Deletion/Erasure

You may request to erase your personal data, subject to applicable law. If you close your account, we will mark your account in our database as "Closed," but will keep certain account information for a period of time as described below. This is necessary to deter fraud, by ensuring that persons who try to commit fraud will not be able to avoid detection simply by closing their account and opening a new account, and to comply with our legal obligations. However, if you close your account, your personal data will not be used by us for any further purposes, nor shared with third parties, except as necessary to prevent fraud and assist law enforcement, as required by law, or in accordance with this Policy.

Restrict Processing of Data Requests

You have the right to request to restrict or object to us processing or transferring your personal data under certain circumstances.

Unsubscribe from Direct Marketing

You have the right to ask us not to process your personal information for marketing purposes. You can exercise this right simply at any time by carrying out 'unsubscribe' actions which are made available to you (such as clicking on the 'unsubscribe' link in each promotional email we send you). We will honor your choice and refrain from sending you such communications. Please note that if you ask us not to contact you by email at a certain email address, we will retain a copy of that email address on a "suppression list" in order to comply with your no-contact request. You are free to change your marketing choices at any time.

You may also control how we use some of your personal data as part of our Services (such as how we may communicate with you) by confirming your preferences in your Profile. Please note that not all communications can be switched off – for example, we may be required to send you email notices about our Services to comply with our legal obligations under the national laws and regulatory guidance.

Automated Individual Decision-Making, Including Profiling.

In some jurisdictions, you have the right not to be subject to a decision based solely on automated processing of your personal data, including profiling, which produces legal or similarly significant effects on you, save for the exceptions applicable under relevant data protection laws.

Exercising Your Privacy Rights

To exercise any of the above privacy rights, please submit a request through one of the following methods:

- Sending us an email at [datasubjectrequest@remitly.com] (mailto:datasubjectrequest@remitly.com); or
- [Contacting us](https://help.remitly.com/s/contact?language=enUS) via *Chat or Phone*.

Identity Verification

For us to process some requests, we will need to verify your identity to confirm that the request came from you. We may contact you by phone or e-mail to verify your request.

****HOW DO WE PROTECT YOUR DATA?****

We employ industry accepted standards in protecting the information you submit to us. We have 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 government identification number, transmitted through our Site and/or our App. We also require the use of security credentials (which may, for example, include a username and password) from each user who wants to access their information on our Site and/or our App.

Where we have given you (or you have chosen) security credentials (such as a password) that enable you to access certain parts of our Service, you are responsible for keeping these details confidential and secure. Moreover, if you allow access to our Services via using your fingerprint on your Device (for example, via Apple Touch ID), then you should not allow any other person to register their fingerprint on that Device as it may allow them access to our Services and you could be held responsible for their actions. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security and any transmission of personal information is at your own risk. If you have any questions about security, you can contact us at privacy@remitly.com.

****HOW LONG DO WE RETAIN YOUR DATA?****

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. To determine the appropriate retention period for personal data, we consider the following based upon your country of residence (amongst other things):

- obligations and/or retention periods imposed on us by applicable laws and/or our regulators
- the amount, nature, and sensitivity of the personal data
- the potential risk of harm from unauthorised use or disclosure of your personal data, and
- the purposes for which we process your personal data and whether we can achieve those purposes through other means.

Please note that by using our Services you expressly agree to us retaining your personal data (including data related to your Transactions and our collection and verification of your identity) for longer than 5 years following the end of your legal relationship with us. This is to allow us to detect and prevent fraud and/or other illegitimate uses of our Service.

****CHANGES TO THIS POLICY****

We may amend this Policy at any time, and whenever we do so we will notify you by posting a revised version on our Site and App. Please review this Policy each time you make a Transaction as it may have been updated since you initially registered for our Services, or since your last Transaction.

If you do not agree with any of this Policy, or any change, you can end your Agreement with us and close your Profile by emailing us at datasubjectrequest@remitly.com or otherwise [contacting us](<https://help.remitly.com/s/contact?language=enUS>).

****LINKS TO THIRD PARTY WEBSITES AND SERVICES****

Parts of our Service use Google Maps services, including the Google Maps API(s). Use of these features is subject to the [Google Maps Additional Terms of Use](<https://www.google.com/intl/en-USUS/help/termsmaps.html>) and the [Google Privacy Policy](<https://policies.google.com/privacy>). By using this Site and the Service you also agree to the Google Terms (as amended from time to time).

Our Site and App includes links to other websites whose privacy practices may differ from those of Remitly. For example, in order to verify your identity, Remitly uses the services of Onfido. Onfido will check if your identity documents are valid, and also confirm that your photo matches the photo on the documents. The results of the check will then be shared with Remitly. Your photo and ID documents will be shared with Onfido for this purpose as well as to allow Onfido to maintain, protect and improve its services. A copy of Onfido's privacy policy can be found [here](<https://onfido.com/privacy>). We also create information based on our analysis of the information we have collected from you.

If you submit personal information to any of those websites, your information is governed by their privacy policies and we do not accept any responsibility or liability for these policies or for any personal information which may be collected and processed via those websites or services (such as contact and location data). We encourage you to carefully read the privacy policy of any website or software application you use or visit.

This Policy does not cover the practices of third parties that you may engage with when using the Services, such as your mobile network operator or other users of our Services. You should contact them about their privacy policy before providing them with any personal information.

****REFERRAL PROGRAM PRIVACY NOTICE****

Using our referral service via e-mail to tell a friend about our Services, you will need to provide your friend's name and email address. Before providing us access to any other person's details, you must obtain their prior consent to you sharing their personal data with us and we will let them know that you have supplied their details to us.

Where you have:

- imported your contacts, at your instruction, we will send an email invite and at most one reminder email inviting him or her to visit our Site. We store this information for the sole purpose of sending this email; and/or
- referred a friend to us, we will automatically send your friend an email and at most one reminder email inviting him or her to visit our Site. We store this information for the sole purpose of sending this email and tracking the success of your referral.

In both cases, your contact/friend may at any time [REQUEST TO REMOVE](<https://www.remitly.com/unsubscribe/stopinvites>) *this information from our database and we will honour such request. We will retain a copy of that email address on a "suppression list" in order to comply with their no-contact request. They are free to change their marketing choices at any time.*

****CHILDREN****

We ask that persons under the age of 18 (which we treat as children and minors) refrain from using our Services or submitting any personal information to us. Persons under the age of 18 years are not eligible to use our Services and if we discover that someone under the age of 18 has registered a Profile with us, we will close it.

****PRIVACY POLICY TRANSLATION****

This Policy is drafted in the English language and translations may be provided in other languages. You agree that the English version of the Policy will control in the event of any inconsistency between the English and translated versions in any dispute related to this Policy.

COMPLAINTS

If you have a complaint regarding our handling of your personal information, email [privacy@remitly.com](mailto:privacy@remitly.com) or contact Remitly [Customer Service](<https://www.remitly.com/home/contact>).

****CONTACT****

If you have any questions, comments, or requests regarding our privacy policy, you may reach out to [privacy@remitly.com](mailto:privacy@remitly.com).

****REGION SPECIFIC PRIVACY TERMS****

We do our best to implement the best privacy practices from each region for all of our customers, but if you are in a certain region, here are some specific requirements that may apply to you.

US STATE PRIVACY RIGHTS:

Explanation of Applicable Privacy Rights

If you are a California resident, you may take advantage of the following privacy rights:

- **Right to Know** : You have the right to know what personal information we have collected about you, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about you.

- **Right to Delete**: You have the right to delete personal information that we have collected from you. Note that there are some reasons we will not be able to fully address your request, such as if we need to complete a transaction for you, to detect and protect against fraudulent and illegal activity, to exercise our rights, for our internal purposes, or to comply with a legal obligation.

- **Right to Correct**: You have the right to correct inaccurate personal information that we may maintain about you, subject to appropriate verification.

- **Right to Opt-Out of the Sale or Sharing of personal information**: You have the right to opt-out of the "sale" or "sharing" of your personal information, as such terms are defined in California privacy laws.

If you are a resident of Virginia, you may take advantage of certain privacy rights, such as to request access, correction, deletion, or a copy of your personal information. We do not "sell" personal information but may engage in "targeted advertising" as these terms are defined under Virginia law, you may also exercise your right to opt-out of such sales or targeted advertising. You have the right to appeal a denial of your privacy rights.

How to Submit a Request

To take advantage of your right to know, delete, correct, or portability under California or Virginia law, or to submit an appeal of a denial of your privacy rights, please contact us by email at datasubjectrequest@remitly.com or by [Contacting Us](https://help.remitly.com/s/contact?language=enUS). *We may request certain information to verify your identity before we can respond to your access, deletion, correction, or portability requests. We will confirm receipt of your request within 10 business days and will respond to your request within 45 calendar days, after proper verification, unless we need additional time, in which case we will let you know.*

We value your privacy and will not discriminate against you in response to your exercise of your privacy rights.

DATA PROTECTION DISCLOSURES

What categories of Personal Information do we collect and what is the purpose?

You can find a list of the categories of personal information that we collect in the "What Personal Data Do We Collect" section above. For details regarding the sources from which we obtain personal information, please see the "How Do We Collect Your Personal Data" section above. We collect and use personal information for the business or commercial purposes described in the "How Do We Use Or Process Your Personal Data" section above.

Categories of Personal Information Disclosed and Categories of Recipients

We disclose the following categories of personal information for business or commercial purposes to the categories of recipients listed below:

- We share Basic Identifying Information with: Service Providers, Corporate Affiliates, Third Party Partners, advertising networks, and social media networks.
- We share Government Issued Identification or Records with: Service Providers, Corporate Affiliates, and Third Party Partners.
- We share Device Information and Other Unique Identifiers with: Service Providers, Third Party Partners, advertising networks, and social media networks.
- We share Internet or Other Network Activity with: Service Providers, Third Party Partners, advertising networks, and social media networks.

- We share Geolocation Data with: Service Providers, Corporate Affiliates, and Third Party Partners.
- We share Payment Information with: Corporate Affiliates and applicable Service Providers that we engage from time to time to help us comply with our legal obligations in relation to risk scoring, fraud, counter-terrorist financing and anti-money laundering.
- We share Transaction Information with: Service Providers, Corporate Affiliates, Third Party Partners.
- We share Recipient Information with: Service Providers, Corporate Affiliates, Third Party Partners, advertising networks, and social media networks.
- We share Referral Information with: Service Providers, Corporate Affiliates, and Third Party Partners.
- We share User Generated Information or Content with: Service Providers who help administer our programs, such as Community or product reviews, and social media networks.
- We share Technical Information with: Service Providers and Corporate Affiliates.
- We share Audio and Visual Information with: Service Providers, such as those who help administer customer service, identity verification for "Know Your Customer" compliance, and fraud or loss prevention services.
- We share Inferences with: Service Providers who help administer marketing and personalization.

For more information on how your information is shared, please see the "Who Do We Share Your Personal Data With?" section. We may also need to share any of the above categories of information pursuant to Legal Process.

Our use of cookies or other tracking technologies may be considered a "sale"/ "sharing" under applicable law. You may have the right to opt-out of having your personal data shared for purposes of targeted advertising. We do not knowingly sell the personal data of consumers under 16 years of age.

Categories of Personal Information that may be considered a Sale or Sharing under California law: Basic Identifying Information, Device or Other Unique Identifier, Geolocation Data, Technical Information, and Internet or Network Activity Information.

Categories of third parties to whom the personal information was disclosed that may be considered a "sale" or "sharing" under California law: certain Service Providers including advertisers and marketing partners, data analytics providers, and social media networks.

For more information on how your information is shared, please see the "Who Do We Share Your Personal Data With?" section, which provides more detail on our Service Providers and Third Party Partners. We may also need to share any of the above categories of information pursuant to Legal Process.

****US CONSUMER PRIVACY NOTICE****

The following Consumer Privacy Notice applies to you if you are an individual who resides in the United States and uses Remitly for your own personal, family, or household purposes.

WHAT DOES REMITLY DO WITH YOUR PERSONAL INFORMATION?

Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social security number and account information
- Transaction history and transaction information or instructions

How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Remitly chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information: For our everyday business purposes – such as to process your transactions, maintain your account(s), or respond to court orders and legal investigations

Does Remitly share?: Yes

Can you limit sharing?: No

Reasons we can share your personal information: For our marketing purposes— to offer our products and services to you

Does Remitly share?: Yes

Can you limit sharing?: No

Reasons we can share your personal information: For joint marketing with other financial companies

Does Remitly share?: Yes

Can you limit sharing?: No

Reasons we can share your personal information: For our affiliates' everyday business purposes—information about your transactions and experiences

Does Remitly share?: Yes

Can you limit sharing?: No

Reasons we can share your personal information: For nonaffiliates to market to you

Does Remitly share?: No

Can you limit sharing?: We do not share

WHO ARE WE?

Remitly, Inc.

WHAT DO WE DO?

How does Remitly protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. We authorize our employees to access your personal information only when they need it to do their work, and we require companies that work for us to protect your information.

How does Remitly collect my personal information?

We collect your personal information, for example, when you:

- open an account or give us your contact information
- use Remitly to send or receive funds

We also collect your personal information from others, such as affiliates or other companies.

Why can't I limit all sharing?

Federal law gives you the right to limit only:

- sharing for affiliates' everyday business purposes—information about your creditworthiness
 - affiliates from using information to market to you
 - sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.

DEFINITIONS

Affiliates: Companies related by common ownership or control. They can be financial and nonfinancial companies. Our affiliates include companies with a Remitly name such as Remitly UK Ltd, Remitly Europe Ltd, or Remitly Canada, Inc.

Nonaffiliates: Companies not related by common ownership or control. They can be financial and nonfinancial companies.

Nonaffiliates with which we share personal information include service providers that perform services or functions on our behalf.

Joint Marketing: A formal agreement between nonaffiliated financial companies that together market financial products or services to you. Our joint marketing partners include financial companies and banks.

****OTHER IMPORTANT INFORMATION****

For California residents: If your Remitly account has a California mailing address, we will not share information we collect about you with nonaffiliated third parties, except as permitted by law, including, for example, with your consent or to service your account. We will limit sharing with our affiliates to the extent required by California law.

For Vermont residents: If your Remitly account has a Vermont mailing address, we will not disclose information about your creditworthiness to our affiliates and will not disclose your personal information, financial information, credit report, or health information to nonaffiliated third parties to market to you, other than as permitted by Vermont law, unless you authorize us to make those disclosures.

QUESTIONS?

[Contact us.](<https://help.remitly.com/s/contact?language=enUS>)