DRN-5572647

The complaint

Mr S complains Revolut Ltd ('Revolut') closed his account and won't open a new a one for him.

What happened

Mr S had an account with Revolut. In August 2021, Revolut asked Mr S for some information to conduct source of funds checks. It asked Mr S for evidence of his income and for information regarding several transactions he had made. Mr S responded to Revolut's request a few days later and explained he was unable to provide all the information Revolut had asked for, as it would take him months to provide it. Mr S also requested that Revolut close his account as he said he would rather use a different provider.

At the beginning of September 2021, Revolut conducted a review of Mr S' account and restricted his access to the account and remaining funds. Revolut confirmed a couple of weeks later that it had decided to close Mr S' account and requested details of an external account to transfer the funds remaining in Mr S' Revolut account. Following this, Mr S reiterated to Revolut on several occasions that he no longer wanted an account with it and wished for his account to be closed.

In February 2023, Mr S approached Revolut and asked for a new account to be opened. Revolut declined to provide Mr S with an account and said it wouldn't be sharing the reasons behind its decision.

Mr S complained to Revolut in October 2024. He explained that he had tried to open a new account with Revolut several times since his account had been closed but had been unable to do so. Mr S requested an explanation regarding why he was banned from using Revolut's services and for Revolut to permanently delete Mr S' data, so he could open a new account.

Revolut issued a final response to Mr S' complaint and in summary, it said:

- Mr S' account had been under review since September 2021 and limitations had been placed on the account

- To fulfil its regulatory obligations, Revolut at times needs to conduct reviews on customers' accounts

- Mr S' account was closed in September 2021 in line with the account terms and conditions

- Any attempts to create a new account with Revolut is detected by Revolut's systems and such accounts are closed

- The decision to close Mr S' account was final and couldn't be appealed

- Revolut is legally required to keep certain personal data for a minimum of six years

Mr S remained unhappy with Revolut’s response and referred his complaint to our service.

One of our Investigators looked into things and didn’t uphold the complaint.

In summary they said:

- Revolut acted fairly when it closed Mr S’ account in 2021 and did so in line with the account terms and conditions and wider legal and regulatory obligations

- Revolut shared information with our service regarding why it decided to close Mr S’ account. Whilst this information couldn’t be shared with Mr S, no error had been made in closing his account

- Mr S wanted an explanation why Revolut no longer wanted him as a customer, but Revolut wasn’t obligated to provide Mr S with the reasons for its decision

- Revolut’s required to retain certain data for six years and had explained this to Mr S. This was reasonable and should Mr S wish to enquire further about this, he could contact the Information Commissioner’s Office (ICO)

- A card refund of £2.53 had been received after Mr S’ account had been closed, and Revolut are able to transfer the funds to Mrs S’ external account

Mr S disagreed. In summary, he said:

- It was unreasonable for Revolut to close his account without providing an explanation, particularly since Mr S had been using the account in good faith

- Mr S had been using his Revolut account to buy and sell personal items online. He hadn’t read through Revolut’s terms and wasn’t aware this sort of account usage could violate Revolut’s terms. Mr S also considered the terms of the account to be lengthy and full of jargon

- Revolut should have warned Mr S in advance of deciding to close his account, if it considered his account usage was in violation of its policies

- Clear information hadn’t been provided regarding the legality of Revolut retaining Mr S’ data, how long it could do so, and Mr S’ right to request his data to be deleted by Revolut. Under the UK General Data Protection Regulation (UK GDPR) Revolut must have a clear and justified reason for retaining data. And it should be able to specify why it needs to retain Mr S’ data if its due to complying with legal and regulatory obligations

- Mr S requested an explanation in relation to the above points and if Mr S wasn’t provided with this information, he would escalate matters to the ICO

- The matter had been ongoing for years and Mr S felt there was a lack of accountability and vague responses provided by Revolut

- Mr S felt his case had been pre-determined and our service had accepted what Revolut said without questioning it further

Our Investigator looked into things again and said the following:

- Revolut asked Mr S for additional information regarding his account in August 2021, when it conducted a review. Mr S responded and said he wouldn't be able to provide the information Revolut asked for and requested his account be closed

- Whilst Mr S' account was under review in September 2021, Mr S repeatedly asked Revolut for his account to be closed

- Just as Mr S could request for his account to be closed, Revolut could also close an account without providing notice or an explanation – as long as it did so in line with the account terms

- Having reviewed Revolut's reasons for not wanting to accept Mr S as a customer again, this was fair and our service is unable to tell Revolut who it should offer an account to

- Revolut was required to retain data regarding Mr S to comply with its legal and regulatory obligations, as well as to protect itself. Revolut can retain this information and wouldn't look to delete it, in order to allow Mr S to open a new account. Mr S could raise any further issues relating to Revolut retaining his data with the ICO

- Revolut's account terms include a section regarding when it can close an account. It wasn't hidden nor did it contain excessively complex information

- The role of our service is to investigate complaints impartially and provide a fair answer. It wasn't our role to tell a firm how to operate and what processes to use – this is the role of the industry regulator, the Financial Conduct Authority (FCA)

Mr S disagreed. He said his requests for his account to be closed didn't justify Revolut's decision to eventually close it. Mr S considered that Revolut retaining his data meant that he was prevented from opening a new account with it – so Mr S should be provided with a legal explanation regarding why his personal data hadn't been deleted by Revolut.

Mr S reiterated that he felt Revolut's account terms were complex and our service's role was to scrutinize if Revolut had not only followed its policies but if this had had resulted in a fair outcome for Mr S.

As no agreement could be reached, Mr S asked for his complaint to be decided by an ombudsman.

What I've decided – and why

I've considered all the available evidence and arguments to decide what's fair and reasonable in the circumstances of this complaint.

I'm very aware that I've summarised the events in this complaint in far less detail than the parties and I've done so using my own words. No discourtesy is intended by me in taking this approach. Instead, I've focussed on what I think are the key issues here. Our rules allow me to do this. This simply reflects the informal nature of our service as a free alternative to the courts.

If there's something I've not mentioned, it isn't because I've ignored it. I'm satisfied I don't need to comment on every individual argument to be able to reach what I think is the right outcome. I do stress however that I've considered everything that Mr S and Revolut have said before reaching my decision.

Having done so, I have decided not to uphold this complaint. I understand this will be disappointing for Mr S, so I'll explain why.

Account closure

Financial businesses in the UK are strictly regulated and must take certain actions in order to meet their legal and regulatory obligations. They are also required to carry out ongoing monitoring of an existing business relationship. That sometimes means businesses need to restrict, or in some cases go as far as closing, customers' accounts.

The terms and conditions of the account say that Revolut could close the account by giving Mr S at least two months' notice. And in certain circumstances it can close an account immediately or with less notice. I don't consider this information in the terms and conditions to be difficult to find nor ambiguous.

I appreciate Mr S has explained he requires an account with Revolut for his financial needs and to transact in different currencies. But having carefully considered the reasons Revolut has provided to us in confidence, I think it closed Mr S' account fairly and in line with the account terms and conditions, which Mr S and Revolut had to comply with when the account was opened. Revolut isn't obliged to share why it decided to close Mr S' account with him.

I'd also add that our rules allow us to receive evidence in confidence. We may treat evidence from businesses as confidential for a number of reasons – for example, if it contains security information, or commercially sensitive information. Some of the information Revolut has provided is information I consider should be kept confidential.

Mr S was asked for information regarding the source of funds entering his account in August 2021 before Revolut took the decision to close it. This is because Revolut is required to carry out customer due diligence (CDD) to comply with its legal and regulatory obligations, and to prevent financial crime or harm. Mr S refused to provide the information – so I don't find it unreasonable for Revolut to have closed Mr S' account.

I acknowledge Mr S is unhappy he hasn't been able to open a new account with Revolut. Revolut has a broad commercial discretion in who it wants to provide accounts to, and on what terms. I'm satisfied Revolut acted in line with the terms of the account, and its decision not to allow Mr S to open an account is based on legitimate commercial discretion that it's entitled to exercise given the prevailing circumstances here.

Mr S' personal data

Mr S feels strongly that Revolut should delete any data it has about him because he considers it hasn't provided adequate reasons for retaining his data. And the data Revolut holds, is preventing Mr S from opening a new account with it.
I've reviewed Revolut's data retention policy which says *'it's required to keep certain personal data for a minimum of 6 years under Know Your Customer (KYC) and anti-money laundering laws.'* Revolut has also shared this information with Mr S.

If Revolut was to delete Mr S' data, it could prevent Revolut from reviewing any new account applications from Mr S. And given that Mr S has already tried to open a new account with it, I consider there's a likelihood that without keeping Mr S' data and account history, Mr S could open a new account with Revolut. Given that Revolut fairly closed Mr S' account and has decided it no longer wants to accept Mr S as a customer, I don't think it's unreasonable that Revolut retain Mr S' data for six years, which as I've said, is in line with its legal and regulatory requirements.

Mr S has recently decided to approach Revolut and make a Data Subject Access Request (DSAR) after it was brought to his attention that he can do so.

It isn't our service's role to decide whether there has been a breach of data protection rules here, that is for the ICO to determine, but instead to see what has happened and whether Mr S has been treated fairly – which I consider he has been. If Mr S remains unhappy with the response he receives, he may wish to complain to the ICO should he feel Revolut has breached data laws.

Mr S has expressed concerns regarding the impartiality of our service. Whilst I recognise Mr S' concerns, as an ombudsman service our approach is to consider what both parties say and then reach our own independent conclusions on that evidence. That is what I have done on this complaint. If Mr S doesn't agree with my decision he does not have to accept it, and if he doesn't accept this final decision, he will be free to continue to pursue his concerns by other means should he wish to do so. I cannot, however, advise him on how to go about doing that.

Having considered everything, I think Revolut have acted reasonably in the circumstances of the complaint - so I won't be directing Revolut to do anything to put things right.

My final decision

For the reasons above, I have decided not to uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr S to accept or reject my decision before 9 September 2025.

Khadijah Nakhuda
Ombudsman