

## **The complaint**

Mr R complains that Wise Payments Limited (Wise) closed his accounts and won't delete records it holds of his personal data. Mr R also complains that Wise would only provide him with partial email addresses when he was in contact with it and attempting to verify his identity.

## **What happened**

Mr R held multiple accounts with Wise which were closed across 2024 and 2025. Whilst attempting to verify his identity during correspondence with Wise's customer service department in 2025, Mr R asked Wise for the full email addresses his accounts were set up with. Wise explained that it was unable to provide this due to privacy regulations and could only provide partial email addresses to Mr R. Mr R has said this made it impossible to verify himself or guess which email address he had used.

Mr R later asked Wise to delete the personal data it held about him, citing his right to erasure under the General Data Protection Regulation (GDPR). Wise explained it was unable to do this as it would mean breaching financial regulations.

Mr R raised a complaint with Wise who issued its final response letter (FRL) dated 16 June 2025 where it explained that its decision to close Mr R's accounts was final and that he would not be able to open any further accounts with it. Wise's FRL also explained that due to privacy regulations it was not able to disclose full email addresses and, further, it referred Mr R to a part of its website which set out how long it would hold his data for.

Mr R remained unhappy so referred his complaint to our service. One of our Investigator's looked into it, and they recommended it wasn't upheld. In summary, they said Wise was able to close the accounts in the way it did and was satisfied it'd done so in line with the terms and conditions of the accounts. They explained Wise had acted fairly by only providing partial email addresses to Mr R and were equally acting fairly in not agreeing to delete the personal data it held about him.

Mr R disagreed. He's said he was never given a clear and transparent explanation for the reason his accounts were closed and that only being provided partial email addresses by Wise was not reasonable or practical. Mr R has also said that Wise have not addressed his GDPR request properly and that he has been left unable to use Wise's services as he cannot create a new account; which is causing him significant inconvenience and frustration.

He has asked for a final decision, so his complaint has now been passed to me for a decision.

## **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.

Wise has strict legal and regulatory requirements it must meet whilst it provides accounts for

its customers. Part of these require Wise to monitor its customers' accounts, and this sometimes means it may carry out a review, the result of which might mean an account is closed. Mr R had multiple accounts closed by Wise and I've therefore considered the applicable terms and whether this was fair.

I'm satisfied Wise fairly relied on its terms and conditions to take these actions. I've reviewed the terms and conditions for Mr R's accounts and having also considered the circumstances of the account closures; I'm satisfied they allow Wise to do this.

Regarding the decision to close the accounts, Wise has provided details of its decision-making process, that I am accepting in confidence - which is a power afforded to me under DISP 3.5.9R(2) of the Dispute Resolution Rules. I'm sorry but I can't share this information with Mr R due to its commercial sensitivity. A description of this information is that it relates to account use and Wise's procedures. On balance when considering Wise's wider regulatory responsibilities and all the information available to me, I find it had a legitimate basis for closing Mr R's accounts and not telling him why.

Wise is under no obligation to tell Mr R the reasons it no longer wants him as a customer as much as he'd like to know. So, I can't say it's done anything wrong by not giving Mr R this information. And it wouldn't be appropriate for me to require it do so.

I'm sorry to hear that Wise's decision to no longer allow Mr R to hold an account with it has caused him significant inconvenience. But, as I don't think Wise has done anything wrong in making this decision, I see no basis for it to reactivate any accounts or award any compensation to Mr R for any financial loss, distress, or inconvenience he may have suffered.

I've considered whether Wise were unreasonable in only providing Mr R with a partial email address but I don't agree that it was. In order for Wise to complete sufficient and robust security checks I would not expect it to reveal any more of the email addresses than it did. I can see that Wise also provided Mr R with details on how he could change his email address if he no longer had access to it and so I find that Wise gave Mr R reasonable ways in which to verify his identity.

Mr R has said that Wise have not explained why his personal data must remain with it indefinitely and that he hasn't received any information on how his data will be safeguarded. As Mr R has pointed out, the GDPR sets out the right to be forgotten. But the regulations also specify that this is not an absolute right and only applies in certain circumstances. In brief, Wise are entitled to keep Mr R's data. While there is a right to erasure under Article 17 of the GDPR, this is not an absolute right. The GDPR regulations say the right to be forgotten does not apply if processing by a business is necessary for several specific reasons, and these include if there is a legal obligation to retain the information.

Wise is bound by the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017/692. Under these regulations they have a requirement to undertake customer due diligence in certain scenarios (regulation 27). Where regulation 27 applies, they must verify the customer's identity (regulation 28). Any information obtained under regulation 28 must be kept for five years from when the business relationship ends (regulation 40). As a result, Wise are not required to delete the personal data it holds about Mr R despite his request to delete it under the GDPR.

Wise's privacy policy, which forms a part of its terms and conditions and is available on its website, outlines how it will protect Mr R's personal data. I find that Wise have acted fairly in not agreeing to Mr R's request to delete the personal data it holds about him.

**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 R to accept or reject my decision before 8 April 2026.

Mark Louth  
**Ombudsman**