

# Privacy Policy

## ONLINE PRIVACY STATEMENT

Last Revised: This Privacy Policy shall be effective from 16 February 2026.

This is the privacy statement for BVNK Holdings Limited and all of its subsidiaries and affiliates (“**BVNK**”, “**we**”, “**us**”, “**our**”).

BVNK respects and protects the privacy of visitors to our websites, our customers who use our services and our customer’s end-users. To ensure transparency, this Privacy Policy describes our data handling practices when you (i) register, access or use content we own or operate on the websites located at [www.bvnk.com](http://www.bvnk.com), [www.layer1.com](http://www.layer1.com), or any other associated websites we own or operate (each a “**BVNK Site**” and collectively the “**BVNK Sites**”); (ii) use our embedded services through an application programming interface(s) (“**API**”) on a third-party website; (iii) represent one of our clients; (iv) work with us as a service provider or introducer; (v) visit a BVNK office or register to attend a BVNK event; (vi) any other situation which requires the collection, use and disclosure of your personal data; or (vii) are an end user, counterparty, cardholder, wallet holder, payee, payer, or other individual whose personal data is processed by us because you are transacting with, receiving services from, or otherwise interacting with one of our customers who uses our infrastructure or embedded services.

Please take a moment to read through this Privacy Policy. If you have any specific questions about it, you’re welcome to contact us at [dpo@bvnk.com](mailto:dpo@bvnk.com), and we will be happy to give you further clarity.

## Information about this Privacy Policy

This Privacy Policy outlines what data we collect from you, how we use this information, and the situations in which we disclose such information, in compliance with the relevant data protection laws, including but not limited to the General Data Protection Regulation (EU 2016/679) (“**GDPR**”), the UK Data Protection Act 2018 (“**DPA**”), the Spanish Data Protection Act (“**Organic Law**”).

3/2018”), the Singapore Personal Data Protection Act (“**SG PDPA**”) and the California Consumer Privacy Act (“**CCPA**”), as amended by the California Privacy Rights Act (“**CPRA**”) (each a “**Data Protection Law**” and collectively, the “**Data Protection Laws**”).

By accessing the BVNK Sites, using our service, and/or any other activity which may require the collection, use and disclosure of your personal data, you acknowledge that you have accessed and read our Privacy Policy, and you acknowledge that you have been informed of BVNK’s collection, use and disclosure of your personal data.

Terms not otherwise defined in this Privacy Policy shall have the same meaning as is found in the applicable Data Protection Laws.

## PRIVACY STATEMENT

### Legal justification for processing personal data

Unless otherwise indicated, the processing of personal data refers to the collection, use and disclosure of personal data under the relevant Data Protection Laws. Where there is any inconsistency and/or conflict between the Data Protection Laws, the GDPR shall prevail.

Pursuant to Article 6 of the GDPR, BVNK shall only process your personal data if at least one of the following bases applies:

- the data subject has given consent to the processing of his or her personal data for one or more specific purposes (“**Consent**”);
- processing is necessary, at the request of a data subject, to take steps before entering into a contract including performing verification of your identity and sending specific data to any relevant partners, as well as performing a contract, including contracts that you enter into with BVNK and sometimes with BVNK and a third party to support a specific product (“**Contract Performance**”);
- processing is necessary for compliance with a legal obligation which we are subject to (“**Legal Obligations**”); and/or

- processing is necessary for the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, which require protection of personal data, in particular where the data subject is a child (“**Legitimate Interest**”).

## ***1. Consent***

Where we process personal data as a result of consent, we ensure that consent is, where required, freely given, specific and informed, and established by a clear affirmative act. Where Consent is withdrawn, we have set out (below) how this may be undertaken by the data subject.

## ***2. Contract Performance***

Where we enter into a contract with third parties, processing of personal data may, as a matter of course, be necessary in order to execute such a contract or take pre-contract preparation steps.

## ***3. Legal Obligations***

Where there are legal obligations which apply to BVNK by virtue of any relevant Data Protection Law and/or an order of court, the processing of personal data may be required.

## ***4. Legitimate Interest***

Where BVNK has conducted an assessment as to whether the processing of personal data is in the legitimate interests of BVNK and that the legitimate interests of BVNK outweigh any adverse effect on the individual whose personal data is being processed, BVNK may rely on the Legitimate Interest exception (Article 6.1(f) of the GDPR) to process the personal data.

Where applicable, the individual will be provided with reasonable access to information concerning BVNK’s processing of personal data on this basis.

# Processing of Personal Data of End Users and Transaction Counterparties

In certain circumstances, BVNK processes personal data of individuals who are not BVNK's direct customers. This occurs where BVNK provides infrastructure, embedded services, payment, wallet, card issuing, custody, or compliance services to its customers, and those customers use BVNK's services to interact with other individuals (for example, cardholders, wallet holders, transaction counterparties, payees, payers, merchants, or recipients of transfers).

Depending on the service and how BVNK's functionality is made available, these individuals may interact directly with BVNK's systems and accept our end-user terms, or we may process their personal data solely because they are transacting with or receiving funds from our customer without any direct interaction with us.

In such cases, we process this personal data on the basis of:

- compliance with legal and regulatory obligations (including AML, CTF, sanctions screening, and travel rule requirements);
- the legitimate interests of our customers and us in enabling the secure and compliant provision of our services and product features; and/or
- the performance of our contractual obligations to its customers.

## What categories and types of personal data does BVNK collect?

If you wish to use any of our services, we will collect and retain certain relevant data of yours, including some of your personal data.

We collect the following categories and types of personal data:

<b>Category of Personal Data Collected</b>	<b>Type of Personal Data Collected</b>
Identifiers	Names, Address, Date of Birth, Signature, Unique Identifiers/Personal Descriptors, IP Address, Cookies/Online Tracking Technologies, Communications from You, Email Address, KYC/KYB Documentation, Phone Number, Phone Country Code, Relationship Status.
Sensitive Personal Data	Government Issued Identification Numbers, Nationality.
Financial Information	Transaction Information, Credit Information, Account Authentication Details, Contractual Details, Salary, Card Transaction History, Merchant Details, Spending Limits, BVNK Wallet Balance, Transaction Amount, Date/Time of Transaction.
Professional or Employment-Related Information	Socio-Demographic Details, Work Details, Employer, Profession and Education Background, Occupation.
Card & Service Operational Data	Card ID, Merchant Details, Fraud Check Data (for transaction screening), Dispute/Chargeback Data.
Internet or Other Technical Information	Details about your devices and technology that you use to access our services, Log Data (the type of browser you use, access times, pages viewed, and the page you visited before navigating to our Services), Device Information (data about the device you use to access our services, including information about the device's software and hardware, Media Access Control ("MAC") address and other unique device identifiers, device token, mobile network information and time zone).
Geolocation Data	Location.
Commercial Information	Products/Services Provided to You, Consumption Data (data about your consumption habits relating to your use of our services, including which purchases you make with both virtual and real currencies.
End User, Wallet and Counterparty Identifiers	Wallet address, wallet permissions/authorisations (permits), supported networks and currencies, wallet capability data (such as balances), persistent contact records relating to transaction counterparties, payers, payees, cardholders, and wallet holders.

## How does BVNK collect my personal data?

We collect your personal data directly from you, from third parties operating on our behalf, from third parties that connect to our embedded services via an API, from cookies and other online tracking technologies, from publicly available resources, public records and information about you that is openly available on the internet; and from third-party service providers and partners where necessary to provide you with the services or products you have requested. We may also receive personal data from our customers where they submit information to us relating to their own end users, cardholders, wallet holders, or transaction counterparties in order to use BVNK's services.

## How does BVNK handle my personal data?

We will only process personal data that is relevant for the purposes for which it is required. The specific purposes for which the information is collected will be apparent from the context in which it is requested, and include the following:

- to verify the identity of our customers;
- to provide, maintain, and improve the features and functionality of our site and services, based on our legitimate interest and/or the performance of the contractual relationship between you and us;
- to provide for internal non-marketing or administrative purposes, based on our legitimate interest;
- to provide information to you about updates and new services, based (when relevant): (i) on the performance of the contractual relationship between you and us or (ii) if relevant, your consent; or (iii) if relevant, our legitimate interest;
- to provide and manage new products or features which involve third-party service providers, such as the issuance of a card, and to share the necessary personal data with that third party to enable them to deliver their contractual obligations to you and to us;
- to perform real-time fraud, financial risk, and balance checks for card transactions, based on Legitimate Interest;

- to investigate, manage, and resolve card-related disputes, based on Contract Performance and/or Legal Obligations;
- to process billing and collection of any fees based on the performance of the contractual or pre-contractual relationship between you and us; and
- to meet our legal and regulatory obligations in terms of the applicable laws.

We do not retain your data indefinitely. From time to time and/or upon your request, BVNK undertakes periodic reviews to ensure that any personal data that is no longer needed by BVNK may be destroyed and/or deleted. BVNK is, however, required to retain certain forms of personal data in accordance with the relevant legislation/regulations, such as information needed for income tax and audit purposes.

The applicable duration for which certain kinds of personal data should be retained may also be governed by specific business-sector requirements, contractual obligations and agreed practices.

## **How will BVNK use the personal data it collects about me?**

To comply with legal and regulatory requirements in rendering our services, BVNK may be required to disclose information about you and/or your account to the following trusted third parties, namely:

- Our agents, affiliates and/or professional advisors.
- Our networked partners that connect to our services through an API.
- Service providers assisting us in processing or otherwise fulfilling transactions and/or providing required services and/or products provided by third parties.
- Law enforcement, regulatory and governmental agencies if or when requested.

We don't use your personal data to:

- send commercial or marketing messages to you, without your prior consent; or
- sell your data to third parties.

## **Will BVNK share my personal data with anyone else?**

We do not sell your personal data. However, we may share your information in the manner and for the purposes described below:

- internally, where such disclosure is necessary to provide you with our services or to manage our business;
- with our network of partners linked to our embedded services via an API, where such partners may receive information about you that we, you, or others share with them.
- with third parties who help manage our business and deliver services, pursuant to a contract between the third party and BVNK, or pursuant to a contract between the third party and you. In these circumstances, the third party may be another controller, processor or sub-processor. Where the third party is a processor or a sub-processor, they are obliged, amongst other things, to keep your details secure, and to use them only to fulfil their contractual obligations to BVNK under a processing agreement or terms which comply with Data Protection Laws;
- with agencies and organisations working to prevent fraud in financial services;
- with our regulators; and/or
- to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies.
- to comply with regulations commonly known as the “travel rule,” where we may collect counterparty information when you receive a deposit from outside of our service, or when you make a transfer to a wallet address outside of our service.

We work with different types of third-party service providers, including:

- IT service providers
- Third-Party Electronic ID Verification Service Vendors, including those that process biometric information

- Vendors for tax reporting
- Marketing and promotions providers (to promote our Services)
- Telecommunications technology providers (to send you messages, including SMS messages)
- CTF/AML service providers (for the purposes of transaction monitoring)
- Data hosting service providers and payment vendors (for off-site data hosting)
- Security service providers (for investigating fraud and security incidents)
- Analytics providers (to understand how you use our Services)
- Payment processing companies (to process transactions on our behalf)
- Document repository services providers
- Customer support vendors
- Chatbots

When they no longer need your personal data to fulfil this service, they will dispose of the details in line with BVNK's data retention policy, or as otherwise set out in the processing agreement.

## **We operate globally**

The personal data we collect from you may be transferred to, stored and processed outside of the jurisdiction in which you live. The laws of those countries may vary from the laws applicable in your own country. Data gathered in the European Economic Area (“**EEA**”) may be transferred to, stored and processed at a destination(s) outside of the EEA. Said international data transfers will be carried out in strict compliance with the Regulation and after having executed the relevant Standard Contractual Clauses with the recipients of the data.

Unless otherwise indicated, where your personal data is transferred out of the jurisdiction of which it is collected, BVNK will ensure that such personal data will continue to be protected by a standard of protection that is comparable to the protection the personal data would have had under the laws of the jurisdiction in which the personal data was collected.

Your account is stored by BVNK on a secure server maintained and operated by third-party service providers. These third-party providers are bound by and adhere to the relevant data processing agreements, in compliance with Data Protection Laws.

## Your data protection rights

Depending upon where you reside, certain choices and rights may be available to you under applicable Data Protection Laws. If you have questions about what rights may apply to you, please contact us at [dpo@bvnk.com](mailto:dpo@bvnk.com).

## Subject to the applicable Data Protection Laws, you may have the right to:

- have access to your personal data by submitting a request to us;
- know the personal data we have collected about you, including:
  - the categories of personal data we have collected about you;
  - the categories of sources for the personal data we have collected about you;
  - the specific pieces of personal data we have collected about you;
  - our business or commercial purpose for collecting or selling your personal data; and

- the categories of third parties to whom we have sold or shared your personal data, if any, and the categories of personal data that we have shared with each third-party recipient;
- have your personal data deleted;
- have your personal data corrected if it is inaccurate;
- have the processing of your personal data restricted;
- object to further processing of your personal data, including to object to marketing from us or sharing for the purposes of cross-contextual behavioural advertising or profiling;
- make a data portability request;
- be notified as soon as practicable in the event that a material data breach occurs;
- withdraw any consent you have provided to us;
- restrict any automatic processing of your personal data;
- limit our use of any sensitive personal data to those uses which are necessary to perform services or for other business purposes; and
- complain to the appropriate Supervisory Authority.

Residents of the State of California may also request a list of all third parties to which we have disclosed certain information during the preceding year for those third parties' direct marketing purposes.

For your protection, we will take steps to verify your identity before fulfilling any request. You also have the right to complain to a Supervisory Authority, in particular:

- a list of **European Union** data protection authorities can be found [here](#);
- the **United Kingdom's** data protection authority's contact details can be found [here](#);
- the **South African** data protection authority's contact details can be found [here](#);

- the **Singapore** data protection authority's contact details can be found [here](#); and
- the **California Privacy Protection Agency** contact details can be found [here](#).

Non-Discrimination: You will not receive any discriminatory treatment by us for the exercise of your privacy rights.

## Do Not Track Requests

The BVNK Sites are not designed to respond to "do not track" requests from browsers.

## Security measures for your personal data

We take all appropriate and reasonable technical and organisational measures to prevent the loss of, damage to or unauthorised destruction of personal data and the unlawful access to or processing of such data. We have systems in place to control your data in a way that minimises its exposure.

This includes adherence to the Payment Card Industry Data Security Standard (PCI DSS) for any processing or storage of cardholder data, where applicable, and is managed in partnership with our card issuing partner and processor.

We will take reasonable steps to identify all reasonably foreseeable internal and external risks posed to your personal data under our possession or control and establish and maintain appropriate safeguards against any risks identified.

## Under what circumstances will BVNK contact me?

The personal data we process is subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure. We will get in touch with you where this is required under Data Protection Laws.

## **Third-Party Links**

We may provide links to other websites or resources provided by third parties. These links are provided for your convenience only. We have no control over the contents of those websites or resources and accept no responsibility for them or for any loss or damage that may arise from your use of them. If you decide to access any of the third-party links on the sites, you do so entirely at your own risk and subject to the terms and conditions of those websites.

## **Children**

We do not knowingly collect personal data from children under the age of 13 through our BVNK Sites. If you are under 13, please do not give us any personal data. We encourage parents and legal guardians to monitor their children's internet usage and to help enforce this Privacy Notice by instructing their children never to provide us with personal data. If you have reason to believe that a child under the age of 13 has provided personal data to us, please contact us, and we will endeavour to delete that personal data from our databases.

## **Revisions to this Privacy Policy**

This Privacy Policy may be revised from time to time so we can keep it up to date with global best practices, but we will always let you know when we do via email.

# CONTACT DETAILS

**Email:** [dpo@bvnk.com](mailto:dpo@bvnk.com)

Address: 4th Floor, 91-93 Farringdon Road, London, EC1M 3LN8, United Kingdom

Address: 160 Robinson Road, #14-04, Singapore 068914

Address: 365 Toni Stone Xing, Floor 3, San Francisco, CA 94158, USA

Address: C/ Sancho de Ávila 105, 08018, Barcelona, España

Address: Ruby Workspaces Office 3, Pendergardens, Triq Gort, San Gilijan STJ 9023, Malta For US individuals, you may also call us at +1-888-315-0331