

## Privacy Policy

**Effective date:** 2025-12-01

### 1. Introduction

1.1 This Privacy Policy describes how HelvetiaChain GmbH, operating the Swissfox cryptocurrency exchange platform, collects, uses, stores, shares and otherwise processes personal data in connection with the provision of Swissfox services, including access to and use of the Swissfox website, mobile applications, application programming interfaces, and associated functionality (together the “Swissfox Services”).

1.2 HelvetiaChain GmbH recognises the importance of protecting personal data and is committed to processing personal data in a lawful, fair, transparent and secure manner. This Privacy Policy is intended to provide data subjects with clear and comprehensive information regarding such processing, in accordance with applicable data protection law, including the Swiss Federal Act on Data Protection and, where applicable, the data protection laws of the European Union and the European Economic Area.

1.3 This Privacy Policy forms an integral part of the contractual framework governing the relationship between HelvetiaChain GmbH and users of the Swissfox Services. By creating an account on the Swissfox platform, by accessing or using any of the Swissfox Services, or by otherwise communicating with HelvetiaChain GmbH, a data subject acknowledges that they have read and understood this Privacy Policy.

1.4 This Privacy Policy does not confer contractual rights or obligations beyond those that exist under applicable law and the binding agreements entered into between HelvetiaChain GmbH and its clients or partners.

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### 2. Definitions

For the purposes of this Privacy Policy, the following terms shall have the meanings set out below:

2.1 “Anti Money Laundering Law” means all applicable laws and regulations on the prevention of money laundering and terrorist financing, including the Swiss Federal Act on Combating Money Laundering and Terrorist Financing in the Financial Sector and its implementing ordinances, as well as equivalent foreign legislation to the extent applicable to HelvetiaChain GmbH.

2.2 “Blockchain” means a distributed ledger or similar technology that records transactions in cryptographically secured blocks of data in a manner intended to be immutable and transparent.

2.3 “Controller” means the natural or legal person which alone or jointly with others determines the purposes and means of the processing of personal data.

2.4 “Data subject” means an identified or identifiable natural person whose personal data are processed.

2.5 “HelvetiaChain GmbH”, “HelvetiaChain”, “Swissfox”, “we”, “us” or “our” means HelvetiaChain GmbH, a company incorporated under the laws of Switzerland, with its registered office at Gartenstrasse 6, 6300 Zug, Switzerland, which operates the Swissfox Services and acts as Controller in relation to personal data processed under this Privacy Policy, unless expressly stated otherwise.

2.6 “Partner” means any third party that provides services to HelvetiaChain GmbH or jointly with HelvetiaChain GmbH for the purpose of enabling, supporting or enhancing the Swissfox Services, including but not limited to banking partners, payment service providers, custody providers, liquidity providers, identity verification providers, blockchain analytics providers and other regulated financial intermediaries.

2.7 “Personal data” means any information relating to an identified or identifiable natural person, including but not limited to name, identification numbers, location data, online identifiers, financial information, or factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

2.8 “Processing” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment, combination, restriction, erasure or destruction.

2.9 “Swissfox Account” means an account opened by a user on the Swissfox platform in order to access the Swissfox Services.

2.10 “Swissfox Services” has the meaning given in Section 1.1 and includes, without limitation, the provision of a spot cryptocurrency trading platform, funding and withdrawal rails, client support, onboarding processes, security and fraud prevention services, and any other ancillary services made available by HelvetiaChain GmbH from time to time.

2.11 “Technical data” means information automatically generated by the devices, applications, tools and protocols used to access the Swissfox Services, for example device identifiers, network identifiers, log files, cookies, and other usage data.

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### **3. Identity and contact details of the Controller and data protection contact**

3.1 Unless indicated otherwise in a specific notice or agreement, the Controller responsible for the processing of personal data described in this Privacy Policy is:

#### **HelvetiaChain GmbH**

Gartenstrasse 6, 6300 Zug, Switzerland  
Switzerland  
UID: CHE-381.351.396

3.2 HelvetiaChain GmbH is a member of the Financial Services Standards Association (Financial Services Standards Association VQF), which acts as a self-regulatory organisation recognised by the Swiss Financial Market Supervisory Authority for the purposes of Anti Money Laundering Law. ([VQF](#))

3.3 HelvetiaChain GmbH may appoint a dedicated data protection contact or data protection officer. Current contact details are:

#### **Data Protection Contact**

HelvetiaChain GmbH  
Gartenstrasse 6, 6300 Zug, Switzerland  
Email: support@swissfox.com

3.4 Data subjects may contact HelvetiaChain GmbH at this address for any questions or requests concerning this Privacy Policy or the processing of their personal data.

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#### 4. Scope and territorial application

4.1 This Privacy Policy applies to the processing of personal data carried out by HelvetiaChain GmbH in the context of:

- the use of the Swissfox website and mobile applications;
- the creation, maintenance and use of a Swissfox Account;
- the performance of trades and other transactions through the Swissfox platform;
- the use of support channels and any other interactions with HelvetiaChain GmbH.

4.2 This Privacy Policy applies irrespective of the location of the data subject. Certain rights and obligations described in this Privacy Policy may, however, apply only to data subjects located in specific jurisdictions, for example in Switzerland or within the European Economic Area, depending on the reach of the applicable law.

4.3 To the extent that HelvetiaChain GmbH acts as a processor on behalf of institutional or corporate clients in relation to data concerning natural persons associated with those clients, such processing may be governed by separate agreements with those clients. In such cases, the corporate client will generally be the Controller, and this Privacy Policy shall apply only to the extent HelvetiaChain GmbH acts as an independent Controller for its own purposes.

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#### 5. Categories of personal data processed

HelvetiaChain GmbH processes the following categories of personal data, to the extent necessary for the purposes described in this Privacy Policy:

##### 5.1 Identification and contact data

- Full name and previous names;
- Date and place of birth;
- Residential and correspondence addresses;
- Nationality and residence status;
- Email addresses and telephone numbers;
- Unique identifiers assigned by HelvetiaChain GmbH, such as account numbers or user identifiers.

##### 5.2 Official identification and verification data

- Copies and details of passports, national identity cards, residence permits or other official identification documents;
- Photographs, video images and similar material submitted for identity verification or liveness checks;

- Data resulting from electronic identity verification and screening against sanctions lists, politically exposed person lists, adverse media and similar data sources, in line with Anti Money Laundering Law and sanctions regulations.

#### 5.3 Financial and transactional data

- Bank account details, virtual asset wallet addresses, payment card details (subject to tokenisation or storage restrictions applied by relevant payment service providers);
- Information about deposits, withdrawals, conversions and trades executed through the Swissfox platform;
- Information about sources of funds and sources of wealth;
- Data relevant to the assessment of financial profile and risk profile as required by Anti Money Laundering Law.

#### 5.4 Trading and platform usage data

- Orders, trade history, balances, positions and other records of activity on the Swissfox platform;
- Preferences and settings within the Swissfox Account;
- Interactions with features, pages and content within the Swissfox Services.

#### 5.5 Communications data

- Records of communications between data subjects and HelvetiaChain GmbH, including customer support chats, telephone recordings where permitted by law, email correspondence and any other communication channels;
- Metadata relating to such communications, such as date, time and communication channel.

#### 5.6 Technical and usage data

- Device type, operating system, browser type and version;
- Internet Protocol address, language settings, time zone and other network identifiers;
- Log data relating to access to and use of the Swissfox Services, including information on pages visited, actions performed, dates and times of access, session identifiers and security events;
- Data collected through cookies and similar technologies, as further described in Section 11.

#### 5.7 Compliance and risk data

- Results of know your customer checks, sanctions and politically exposed person screenings, transaction monitoring alerts and investigations;

- Internal risk scores, segmentation and categorisation produced in the context of Anti Money Laundering Law, fraud prevention, sanctions compliance and other regulatory frameworks;
- Records of regulatory requests, investigations and responses.

#### 5.8 Marketing and preference data

- Marketing communication preferences and subscription status;
- Information about participation in surveys, promotions or events organised by HelvetiaChain GmbH;
- Feedback, reviews and responses provided by data subjects.

#### 5.9 Data from publicly available and third-party sources

- Data from public registers, public websites, professional social media platforms and public blockchain ledgers;
- Data from Partners, such as banks, payment service providers, identity verification providers, blockchain analytics providers and other regulated intermediaries, in accordance with applicable law and contractual arrangements.

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### 6. Sources of personal data

HelvetiaChain GmbH collects personal data from the following sources:

#### 6.1 Directly from data subjects, for example when a data subject:

- completes onboarding and account opening forms;
- uploads identification documents and other verification materials;
- initiates or executes trades, deposits or withdrawals;
- contacts customer support or participates in surveys or marketing campaigns.

6.2 Automatically, through the use of the Swissfox Services and associated technologies, for example by recording Technical data and usage data generated by interaction with the Swissfox platform.

#### 6.3 From Partners and other third parties, for example:

- from banks and financial institutions processing payments to or from the data subject;
- from identity verification, sanctions screening and know your customer service providers;
- from blockchain analytics providers and similar service providers used to assess transaction risk and comply with Anti Money Laundering Law;
- from other regulated intermediaries and counterparties as required to process transactions or satisfy regulatory requirements.

6.4 From publicly accessible sources, including public registers, public websites, official publications, public blockchain ledgers and other similar sources, to the extent permitted by applicable law.

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## 7. Purposes and legal bases for processing

HelvetiaChain GmbH processes personal data only where there is a valid legal ground under applicable data protection law. Depending on the context, such legal grounds may include performance of a contract, compliance with a legal obligation, legitimate interests pursued by HelvetiaChain GmbH or a third party, and in certain cases the consent of the data subject.

The main purposes and corresponding legal grounds include the following:

### 7.1 Provision of Swissfox Services and performance of contracts

HelvetiaChain GmbH processes personal data in order to:

- open, maintain and administer Swissfox Accounts;
- enable deposits, withdrawals and spot trading of digital assets;
- provide client support and operational communications;
- manage user settings, preferences and security credentials.

Legal basis: performance of the contract between the data subject and HelvetiaChain GmbH, and legitimate interests in operating, improving and protecting the Swissfox Services.

### 7.2 Compliance with Anti Money Laundering Law, sanctions and other regulatory requirements

HelvetiaChain GmbH processes personal data in order to:

- identify and verify the identity of clients and beneficial owners;
- determine whether a data subject is a politically exposed person;
- screen against sanctions lists and other watchlists;
- monitor transactions for suspicious activity and report such activity to competent authorities;
- comply with record-keeping obligations and audit requirements imposed by law, including those resulting from VQF membership and supervisory standards. ([VQF](#))

Legal basis: compliance with legal obligations under Anti Money Laundering Law, sanctions laws, financial market regulations and self-regulatory rules, and legitimate interests in preventing fraud, money laundering, terrorist financing and other financial crime.

### 7.3 Risk management, fraud prevention and security

HelvetiaChain GmbH processes personal data in order to:

- authenticate users and manage access controls;
- detect, investigate and prevent fraud, abuse, unauthorised access and other security incidents;

- perform risk scoring and segmentation in support of fraud and compliance controls;
- ensure the integrity, availability and confidentiality of the Swissfox infrastructure.

Legal basis: legitimate interests in protecting the Swissfox Services, the assets of clients and HelvetiaChain GmbH, and the financial system, as well as compliance with legal obligations relating to security and incident management.

#### **7.4 Business operations, service improvement and analytics**

HelvetiaChain GmbH processes personal data in order to:

- operate, maintain and improve the Swissfox Services;
- perform analytics and statistical evaluations to understand usage patterns and client needs;
- develop new products and features and adjust the Swissfox operating model;
- manage internal reporting, audit, finance and governance processes.

Legal basis: legitimate interests in ensuring efficient operation, continuous improvement and strategic development of the Swissfox Services.

#### **7.5 Marketing, communication and relationship management**

HelvetiaChain GmbH processes personal data in order to:

- send service-related communications, including notifications of changes to terms, policies, system status and security information;
- inform clients about relevant products, services, features and events, subject to applicable marketing rules;
- manage marketing preferences and opt-out lists;
- conduct surveys, contests or promotions, where and to the extent permitted by law.

Legal basis: legitimate interests in promoting and developing the Swissfox Services and maintaining client relationships, and, where required by law, the consent of the data subject for specific forms of marketing communication.

#### **7.6 Dispute resolution and enforcement of rights**

HelvetiaChain GmbH processes personal data in order to:

- manage and resolve complaints and disputes;
- enforce contractual rights and legal claims;
- defend against legal claims;
- respond to proceedings, investigations and requests from courts, regulators and other public authorities.

Legal basis: legitimate interests in establishing, exercising or defending legal claims and compliance with legal obligations to cooperate with public authorities.

## 7.7 Fulfilment of legal obligations beyond Anti Money Laundering Law

HelvetiaChain GmbH processes personal data as necessary to comply with additional legal obligations, including tax laws, accounting and financial reporting requirements, and data protection regulations, including the Swiss Federal Act on Data Protection and, where applicable, the General Data Protection Regulation of the European Union. ([SFO-SME](#))

Legal basis: compliance with legal obligations.

## 7.8 Processing based on consent

In specific cases where required by law or where HelvetiaChain GmbH chooses to rely on consent, HelvetiaChain GmbH processes personal data based on the freely given, specific, informed and unambiguous consent of the data subject, for example for certain types of optional marketing or for the use of certain categories of cookies.

Data subjects have the right to withdraw their consent at any time, without affecting the lawfulness of processing carried out prior to such withdrawal.

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## 8. Sharing of personal data and categories of recipients

8.1 As part of its operating model, HelvetiaChain GmbH shares personal data with carefully selected Partners and other third parties where such sharing is necessary for the provision of the Swissfox Services, for compliance with legal and regulatory obligations, or for other legitimate purposes described in this Privacy Policy.

8.2 In particular, HelvetiaChain GmbH may share personal data with:

a) **Group entities**

Any present or future affiliates, subsidiaries or group entities of HelvetiaChain GmbH, to the extent necessary for intra-group governance, consolidated risk management, shared infrastructure, support services and compliance functions.

b) **Banking and payment Partners**

Banks, payment service providers, electronic money institutions and similar partners that process fiat currency or digital asset transactions, in order to execute deposits, withdrawals, settlements and related financial flows.

c) **Identity verification and compliance Partners**

Service providers that perform identity verification, sanctions and politically exposed person screening, blockchain analytics, transaction monitoring, fraud detection and other compliance controls, subject to appropriate contractual safeguards.

d) **Technology and infrastructure providers**

Providers of cloud infrastructure, data hosting, security services, communications platforms, analytics tools, customer relationship management systems and other technology components required to operate the Swissfox Services.

e) **Professional advisers and auditors**

External legal advisers, tax advisers, auditors and consultants engaged by HelvetiaChain GmbH, who may receive personal data as necessary to provide their services subject to professional secrecy and confidentiality obligations.

f) **Corporate transaction counterparties**

Potential or actual acquirers of HelvetiaChain GmbH or its assets, merger partners, or investors

and their advisers, in connection with corporate transactions, subject to appropriate confidentiality arrangements.

**g) Regulators, self-regulatory organisations and public authorities**

Regulators, self-regulatory organisations such as the Financial Services Standards Association, law enforcement agencies, tax authorities and courts, where disclosure is required or permitted by applicable law, regulations or self-regulatory rules.

8.3 It is important to emphasise that HelvetiaChain GmbH will share the personal data of users with Partners that are required to provide the Swissfox Services to users. Such Partners act either as processors on behalf of HelvetiaChain GmbH or, for certain processing activities, as independent controllers, subject to their own privacy notices.

8.4 Where third parties act as processors on behalf of HelvetiaChain GmbH, HelvetiaChain GmbH will contractually require them to:

- process personal data only on documented instructions from HelvetiaChain GmbH;
- implement appropriate technical and organisational measures to protect personal data;
- ensure confidentiality and security of personal data;
- assist HelvetiaChain GmbH with the fulfilment of data subject rights and other data protection obligations where appropriate.

8.5 HelvetiaChain GmbH does not sell personal data in the sense of transferring it in return for monetary consideration for advertising or data brokerage purposes. To the extent permitted by law, HelvetiaChain GmbH may use aggregated or anonymised data that no longer allows identification of data subjects for analytical, statistical or commercial purposes.

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## **9. International transfers of personal data**

9.1 HelvetiaChain GmbH is based in Switzerland and may store and process personal data in Switzerland and in other countries, including member states of the European Economic Area and, where necessary, countries outside of Switzerland and the European Economic Area.

9.2 When transferring personal data from Switzerland to another country, HelvetiaChain GmbH will comply with Swiss rules on cross-border data transfers, including any lists of countries recognised as providing an adequate level of data protection as determined by the Swiss Federal Council, and any requirements relating to appropriate safeguards such as contractual clauses or binding corporate rules. ([EDÖB](#))

9.3 Where personal data is transferred from the European Economic Area to a country not recognised as providing an adequate level of protection under the law of the European Union, HelvetiaChain GmbH will implement appropriate safeguards as required by the law of the European Union, which may include standard contractual clauses approved by the European Commission or other legally recognised mechanisms.

9.4 In all cases, HelvetiaChain GmbH will take steps to ensure that recipients of personal data provide a level of protection that is essentially equivalent to that required under the laws applicable to HelvetiaChain GmbH and to the data subjects concerned.

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## 10. Blockchain and public ledger considerations

10.1 Certain operations on the Swissfox platform involve transactions on public or permissionless Blockchains. Entries on such Blockchains, including wallet addresses and transaction details, may be visible to the public and may be analysed by third parties. Depending on the circumstances, such information may constitute personal data or become personal data when combined with other information.

10.2 HelvetiaChain GmbH does not control public Blockchains and cannot modify, erase or restrict access to data that has been recorded on such Blockchains. Once a transaction has been confirmed on a public Blockchain, its technical record may remain permanently accessible.

10.3 By using the Swissfox Services that involve Blockchain transactions, data subjects acknowledge that:

- their transactions will be broadcast to and recorded on one or more Blockchains;
- third parties, including blockchain analytics providers, regulators and other participants, may analyse such data and possibly infer identities and transaction patterns;
- requests to erase or rectify data contained on a Blockchain may in practice be impossible to fulfil at the level of the Blockchain itself. HelvetiaChain GmbH will, however, implement appropriate measures with respect to data it controls off-chain, subject to legal retention obligations.

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## 11. Cookies and similar technologies

11.1 HelvetiaChain GmbH uses cookies and similar technologies on its websites and applications in order to ensure the proper functioning of the Swissfox Services, improve user experience, perform analytics, enhance security and, where permitted by law, personalise content and marketing.

11.2 Cookies are small text files that are stored on a device when the Swissfox website is visited. Similar technologies include pixels, web beacons and local storage.

11.3 HelvetiaChain GmbH may use the following types of cookies and similar technologies:

- **Strictly necessary cookies** that are required for core functionality, such as authentication, security, and navigation;
- **Functional cookies** that remember preferences and settings to improve convenience;
- **Analytical cookies** that collect information about usage of the Swissfox Services to help HelvetiaChain GmbH understand performance and improve services;
- **Marketing cookies** that may be used to deliver or measure advertising, where permitted by law and subject to user choice.

11.4 Where required by law, HelvetiaChain GmbH will present a cookie banner or similar interface to enable data subjects to consent to or refuse certain categories of cookies. Data subjects can change their cookie preferences at any time through the relevant settings and may

also configure their browser to block or delete cookies. However, blocking certain cookies may affect the functionality or performance of the Swissfox Services.

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## 12. Data retention

12.1 HelvetiaChain GmbH will retain personal data only for as long as necessary to fulfil the purposes for which it was collected or to comply with legal, regulatory or contractual obligations, including record-keeping obligations under Anti Money Laundering Law and financial market regulations.

12.2 In particular, HelvetiaChain GmbH is required under Anti Money Laundering Law and related regulations to retain certain records relating to client identification, beneficial ownership, risk assessments and transactions for a minimum period specified by applicable law after the end of the business relationship or the completion of a transaction. That period is often several years and may be extended in the event of investigations, legal disputes or regulatory proceedings.

12.3 When personal data is no longer required for the purposes described in this Privacy Policy and no legal or regulatory obligations require its retention, HelvetiaChain GmbH will either delete the personal data, anonymise it, or segregate and securely store it until deletion is possible.

12.4 Anonymised data that no longer permits identification of data subjects may be retained and used by HelvetiaChain GmbH for analytical, statistical or other legitimate purposes without limitation, provided that re-identification does not occur.

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## 13. Data security

13.1 HelvetiaChain GmbH implements appropriate technical and organisational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access, taking into account the state of the art, the costs of implementation, the nature, scope, context and purposes of processing, and the risks to the rights and freedoms of data subjects.

13.2 Such measures may include:

- access controls based on least privilege and need-to-know principles;
- strong authentication and credential management;
- encryption of data in transit and at rest where appropriate;
- network segmentation, intrusion detection and monitoring;
- secure software development and change management practices;
- logging, monitoring and incident response processes;
- regular testing, assessment and evaluation of the effectiveness of security measures.

13.3 HelvetiaChain GmbH requires its employees, contractors and Partners who have access to personal data to adhere to strict confidentiality obligations and to undergo appropriate training on data protection and information security.

13.4 In the event of a data security incident that is likely to result in a high risk to the rights and freedoms of data subjects, HelvetiaChain GmbH will notify the competent supervisory authority and, where required by law, the affected data subjects, in accordance with the Swiss Federal Act on Data Protection and any other applicable laws and guidance. ([EDÖB](#))

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## **14. Rights of data subjects**

Subject to the conditions and limitations set out in applicable law, data subjects whose personal data is processed by HelvetiaChain GmbH have the following rights:

### **14.1 Right of access**

The right to obtain confirmation as to whether HelvetiaChain GmbH processes personal data concerning the data subject and, where that is the case, to receive a copy of such personal data and certain information about the processing.

### **14.2 Right to rectification**

The right to request the correction of inaccurate personal data and the completion of incomplete personal data.

### **14.3 Right to erasure**

The right to request the deletion of personal data in certain circumstances, for example where the personal data is no longer necessary for the purposes for which it was collected, or where the data subject has withdrawn consent and there is no other legal ground for processing. This right may be limited where HelvetiaChain GmbH is required by law to retain the personal data, in particular under Anti Money Laundering Law, or where the data is needed for the establishment, exercise or defence of legal claims. As indicated in Section 10, erasure of data recorded on a Blockchain may not be technically possible.

### **14.4 Right to restriction of processing**

The right to request the restriction of processing in certain circumstances, for example where the accuracy of the personal data is contested, or where processing is unlawful and the data subject requests restriction instead of deletion.

### **14.5 Right to data portability**

The right, in certain circumstances, to receive personal data provided by the data subject to HelvetiaChain GmbH in a structured, commonly used and machine-readable format and to transmit that data to another controller, or to request that HelvetiaChain GmbH transmit the data directly to another controller where technically feasible and legally permissible.

### **14.6 Right to object**

The right, in certain circumstances, to object to processing of personal data based on legitimate interests, including profiling based on such legitimate interests. HelvetiaChain GmbH may continue the processing if it can demonstrate compelling legitimate grounds that override the interests, rights and freedoms of the data subject or if the processing is required for the establishment, exercise or defence of legal claims.

Data subjects also have the right to object at any time to the processing of their personal data for direct marketing purposes, including profiling to the extent that it is related to such direct marketing. In such cases, personal data will no longer be processed for direct marketing purposes.

#### **14.7 Right not to be subject to certain automated decisions**

The right not to be subject to a decision based solely on automated processing, including profiling, that has legal effects concerning the data subject or similarly significantly affects the data subject, unless such decision is necessary for entering into, or performance of, a contract, is authorised by law, or is based on explicit consent, in each case subject to appropriate safeguards and the right to obtain human intervention.

#### **14.8 Right to withdraw consent**

Where processing is based on consent, the right to withdraw consent at any time, without affecting the lawfulness of processing carried out before the withdrawal.

#### **14.9 Right to lodge a complaint**

The right to lodge a complaint with the competent data protection authority as further described in Section 16.

#### **14.10 Exercising rights**

Requests to exercise these rights can be submitted to HelvetiaChain GmbH using the contact details in Section 3. HelvetiaChain GmbH may need to verify the identity of the requester before acting on a request and may, where permitted by law, charge a reasonable fee or decline to act on manifestly unfounded or excessive requests.

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### **15. Automated decision-making and profiling**

15.1 HelvetiaChain GmbH may use automated systems and profiling to assess certain characteristics of users, in particular for:

- anti money laundering and fraud risk scoring;
- sanctions and politically exposed person screening;
- transaction monitoring and alert generation;
- detection of unusual behaviour patterns indicating potential abuse.

15.2 These processes are designed to ensure regulatory compliance and protect both users and HelvetiaChain GmbH against financial crime and other risks. They may have consequences such as the need for additional verification, temporary account restrictions or, in certain cases, termination of the business relationship or reporting to competent authorities.

15.3 Where a decision producing legal effects or similarly significant effects on the data subject is based solely on automated processing, HelvetiaChain GmbH will ensure that the data subject can obtain human review of the decision, express their point of view and contest the decision, unless applicable law provides otherwise.

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### **16. Supervisory authority and complaints**

16.1 The primary supervisory authority for data protection matters in Switzerland is:

#### **Federal Data Protection and Information Commissioner**

Feldeggweg 1  
CH-3003 Bern

Switzerland  
Telephone: +41 (0)58 462 43 95  
Website and contact forms available at: <https://www.edoeb.admin.ch> (EDÖB)

16.2 Data subjects residing in other jurisdictions may have the right to lodge a complaint with their local data protection authority. Where data protection laws of the European Union or the European Economic Area apply, the competent supervisory authority will generally be the authority of the member state of the data subject's habitual residence, place of work or place of the alleged infringement.

16.3 HelvetiaChain GmbH invites data subjects to contact HelvetiaChain GmbH first using the contact details in Section 3 so that HelvetiaChain GmbH has the opportunity to address concerns directly before a complaint is raised with a supervisory authority.

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## 17. Children

17.1 The Swissfox Services are not directed to persons under the age of eighteen years and HelvetiaChain GmbH does not knowingly collect personal data from persons under the age of eighteen years.

17.2 If HelvetiaChain GmbH becomes aware that a person under the age of eighteen years has provided personal data in connection with the Swissfox Services, HelvetiaChain GmbH will take appropriate steps to delete such personal data and to prevent that person from using the Swissfox Services, to the extent permitted by law and consistent with regulatory obligations.

17.3 Parents or legal guardians who believe that HelvetiaChain GmbH may hold personal data relating to their child are invited to contact HelvetiaChain GmbH using the details in Section 3.

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## 18. Changes to this Privacy Policy

18.1 HelvetiaChain GmbH may revise this Privacy Policy from time to time to reflect changes in law, regulatory guidance, technology, the Swissfox Services or internal processes.

18.2 HelvetiaChain GmbH will publish the updated Privacy Policy on the Swissfox website and indicate the date of the latest revision at the top of the document. Where changes are material, HelvetiaChain GmbH will take reasonable steps to inform users through appropriate channels, which may include email notifications or in-platform messages.

18.3 Any processing of personal data will be governed by the latest version of this Privacy Policy. Continued use of the Swissfox Services after the entry into force of an updated Privacy Policy will constitute acknowledgement of the updated Privacy Policy, without prejudice to any additional consent requirements imposed by applicable law.

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## 19. Contact

Questions, requests or comments regarding this Privacy Policy or the processing of personal data can be addressed to:

**HelvetiaChain GmbH – Data Protection Contact**  
Gartenstrasse 6, 6300 Zug, Switzerland  
Email: [support@swissfox.com](mailto:support@swissfox.com)