

Privacy Policy

1. Overview

This Privacy Policy (hereinafter - "**Policy**") is adopted by Paycific Limited LLC, a company with its registered address at 1001 S Main Street, STE 500, Kalispell, MT 59901, USA, State Registered number: C1630247 (hereinafter - "**Company**", "**We**", "**Our**" or "**Us**").

Due to the Company's registration in the United States (hereinafter - "**U.S.**"), as well as its regulated activities in the financial services sector, certain data processing operations may be subject to U.S. legislative and regulatory requirements.

The Website does not itself execute, settle or complete transactions. However, the Website may allow users (hereinafter - "**User**") to submit an inbound request for OTC exchange services on their own initiative. Any service may be provided only after eligibility review, KYC/KYB verification, AML/sanctions screening, and acceptance of an individual offer by the customer (hereinafter - "**Customer**", "**You**", or "**Your**").

This Policy applies where and to the extent that the processing of personal data falls within the scope of applicable data protection laws.

The Company acts as a data controller where and to the extent that the GDPR applies.

2. Principles of Personal Data Handling

We adhere to the following principles:

Lawfulness, fairness, and transparency - personal data is processed lawfully, fairly, and in a transparent manner. We always provide clear information about the legal basis and purpose of data collection.

Purpose limitation - personal data is collected for specific, explicit, and legitimate purposes and is not further processed in a way incompatible with those purposes.

Data minimization - We only collect and process personal data that is adequate, relevant, and limited to what is necessary for the stated purposes.

Accuracy - We take reasonable steps to ensure that personal data is accurate and, where necessary, kept up to date.

Storage limitation - We retain personal data only for as long as necessary for the purposes for which it was collected or as required by law.

Integrity and confidentiality - We process personal data securely, using appropriate technical and organizational measures to protect it against unauthorized or unlawful processing, accidental loss, destruction, or damage.

Accountability - as a data controller, the Company is responsible for, and able to demonstrate compliance with, these principles.

3. Data We Collect

We may process limited categories of personal data, including:

- Request data:
 - full name;
 - Telegram -nickname;
 - requested transaction amount;
 - requested exchange pair.
- Telegram communication data:
 - Telegram username;
 - messages exchanged with Company representatives;
 - transaction-related instructions or confirmations;
 - timestamps and communication metadata visible to the Company.
- KYC/KYB data:
 - identity document data;
 - proof of address;
 - selfie / liveness data;
 - date of birth, nationality, residence;
 - corporate documents for legal entities;
 - directors, representatives, beneficial owners;
 - source of funds / source of wealth information, where required;
 - sanctions, PEP, adverse media and fraud-screening results.
- Transaction / AML data:
 - wallet addresses;
 - blockchain transaction hashes;
 - fiat payment information;
 - bank/account/payment details, if applicable;
 - transaction amount, asset type, exchange pair, rate, execution status;
 - KYT / blockchain analytics results;
 - risk score, onboarding decision, reasons for rejection or escalation;
 - AML case notes, alerts, internal decisions and supporting documentation.
- Technical and usage data:
 - IP address, device type, browser information, and general usage data;
 - interaction data such as pages visited and general navigation patterns;
- Data collected through cookies or similar technologies, where applicable.

The Company may receive or generate personal data from third-party verification, screening, compliance, blockchain analytics, payment, liquidity, infrastructure and communication service providers, where necessary for identity verification, AML/sanctions screening, fraud prevention, transaction execution, security, recordkeeping, dispute handling or compliance with applicable laws.

4. Minors Data

We do not knowingly collect personal data from minors. If You believe a minor has provided data, please contact Us to delete it.

5. Personal Data We Do Not Collect

We do not intentionally collect or process the following categories of personal data:

- special categories of personal data - We do not collect any data revealing:
 - racial or ethnic origin;
 - political opinions;
 - religious or philosophical beliefs;
 - trade union membership;
 - genetic data;
 - health data;
 - data concerning a person's sex life or sexual orientation.
- criminal convictions and offenses;
- personal data from unlawful or non-transparent sources;
- private keys / seed phrases / withdrawal credentials.

6. Purposes of Processing

We process Your personal data only for specific, explicit, and legitimate purposes. In particular, We use Your data for:

- to communicate with You and provide support - to respond to communications, inquiries or requests submitted by You on Your own initiative;
- to ensure security and prevent abuse - technical safeguards and monitoring for the Website anomaly detection, bot/spam protection.

7. Legal Bases for Processing

Where the GDPR applies, the Company processes personal data on the following legal bases:

- performance of a contract or pre-contractual steps - to process inbound requests, communicate with You, assess eligibility, provide an individual OTC offer and, where accepted, execute the transaction;
- legitimate interests - to operate and secure the Website, prevent fraud and abuse, conduct risk assessment, perform AML/sanctions and blockchain risk checks, maintain business records, establish or defend legal claims, and comply with non-EU regulatory obligations applicable to the Company;
- legal obligations - where the Company is subject to a legal obligation under applicable law and, for GDPR purposes, where such obligation qualifies under EU law;

- consent - where required, including for the use of certain cookies or tracking technologies.

8. Use of Telegram

Where a User provides a Telegram username or agrees to communicate through Telegram, the Company may use Telegram to create a communication chat and exchange service-related messages. Users should understand that Telegram is a third-party communication service and its own terms and privacy practices apply to the User's use of Telegram. The Company uses Telegram for communication and coordination purposes and does not request Users to send private keys, seed phrases, withdrawal credentials or unnecessary identity documents through Telegram. KYC/KYB verification is conducted through a designated verification provider or secure verification link.

9. International Transfers

The Company is established in the United States. Personal data may therefore be processed, stored or accessed in the United States and other jurisdictions where the Company's service providers operate. Where GDPR applies and personal data is transferred from the EEA to a third country that is not subject to an adequacy decision, the Company implements appropriate safeguards where required, such as standard contractual clauses, Data Privacy Framework participation where applicable, transfer impact assessments, contractual protections, access controls, encryption and data minimisation measures.

10. Sharing of Personal Data

The Company does not collect, use, retain or disclose more personal data than is necessary for the purposes described in this Policy. Where the GDPR applies, the Company applies the principle of data minimisation under Article 5(1)(c) of the GDPR. Where applicable to the Company's service activities, the Company also protects Your information and limits disclosures of nonpublic personal information.

We do not sell or commercially trade personal data collected. Where sharing occurs, it is limited to what is necessary and proportionate, subject to data minimization, and confidentiality.

The Company may disclose such data to the following categories of recipients, for instance:

- Service providers and sub-processors - hosting/cloud infrastructure, IT support, maintenance, email delivery, and analytics tools that help Us operate, secure, and improve the Website. These providers may only process data to deliver the contracted service and may not use it for their own purposes.
- Regulatory authorities and public bodies - where disclosure is required by applicable laws, court orders, or regulatory investigations.

11. Data Retention

We retain personal data only for as long as necessary for the purposes for which it was collected.

Different retention periods may apply to different categories of personal data, for instance:

- Website technical logs: retained for a limited period necessary for security, troubleshooting and fraud prevention.
- Inbound request data where no business relationship is established: retained for a limited period necessary to respond to the request, prevent abuse, evidence reverse solicitation / inbound request, and comply with legal or dispute-related needs.
- KYC/KYB, AML/sanctions, transaction and compliance records: retained for at least five (5) years where required under applicable U.S. BSA/AML recordkeeping rules, unless a longer period is required or permitted by applicable law.

12. Data Subject Rights

As a data subject, You have the following rights:

- Right of access - to obtain confirmation whether We process Your personal data, and if so, to receive a copy along with information on how it is processed.
- Right to rectification - to request correction or completion of inaccurate or incomplete personal data.
- Right to erasure ("right to be forgotten") - to request deletion of Your personal data where there is no lawful reason for Us to continue processing it.
- Right to restriction of processing - to request limitation of the processing of Your data under certain circumstances (e.g., contesting accuracy).
- Right to object - to object at any time to processing of Your personal data carried out on the basis of Our legitimate interests.
- Right to data portability - to receive Your personal data, which you provided to Us, in a structured, commonly used, machine-readable format and to transmit it to another controller, where technically feasible. Portability does not apply to processing carried out under legal obligation.
- Right to withdraw consent - where processing is based on Your consent, You may withdraw it at any time. Withdrawal will not affect the lawfulness of processing prior to withdrawal.

If You have additional questions regarding how Your information is processed, We encourage You to first contact Us at Our email and We can address Your concerns promptly and effectively.

13. Security of Personal Data

We implement appropriate technical and organisational measures to protect Your personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access.

Our safeguards include, among others:

- access controls - restricting access to personal data only to authorised personnel who require it for legitimate business purposes;
- secure infrastructure - use of trusted hosting providers, firewalls, encryption, and monitoring tools to safeguard data; We use authenticated, encrypted channels and signed requests; access is restricted on a need-to-know basis and governed by written terms with recipients;
- data minimisation - limiting the volume of data collected and processed to what is strictly necessary;
- incident response procedures - established processes for detecting, reporting, and responding to potential data breaches.

While We take all reasonable steps to protect Your personal data, please be aware that no system of electronic transmission or storage is fully secure. You also play a role in keeping Your data safe by exercising caution when submitting information to Us.

14. Links and Third-Party Services

The Website may contain links or embedded features (e.g., social media buttons). Third-party privacy practices apply to Your interactions with those services; please review their policies.

15. Updates to this Policy

We may update or amend this Policy from time to time to reflect changes in law, regulatory guidance, or Our business practices.

We encourage You to review this Policy periodically to stay informed about how We protect Your personal data.

16. Contacts

Questions, notices, requests, and other communications relating to this Policy may be directed to the Company through the following contact details:

Company name: Paycific Limited LLC.

Registered address: 1001 S Main Street, STE 500, Kalispell, MT 59901, USA.

Website: <https://paycific.io/>

Email: support@paycific.io

The Company may update its contact details from time to time through the Website or by other electronic communication.

