



TheCoinRamp LLC Privacy Policy

How TheCoinRamp Collects, Uses, and Protects Your Information

Effective Date: August 6, 2026 | Version 2.0

FinCEN MSB Registration: BSA ID 31000326517984 | 30 N Gould St, Ste R, Sheridan, WY 82801

At TheCoinRamp, we take privacy and security seriously. This Privacy Policy explains how TheCoinRamp LLC processes information we collect about you through our websites, applications, and other online services, collectively the Services, and when you otherwise interact with us, including through our support channels.

A note on data minimization

We deliberately limit the sensitive information we receive. Where identity verification is performed through a hosted flow operated by a licensed provider or its verification vendor, information such as your Social Security number, identification document images, and any biometric data may pass directly from you to that provider without being received or stored by TheCoinRamp. Section 1.4 explains this.

1. Information We Collect

1.1 Information You Provide

- Identity Data, such as your name, date of birth, and other information appearing on government-issued identification.
- Contact Data, such as your email address, mailing address, and telephone number.
- Financial Data, such as bank account details, transaction history through the Services, and information relevant to source of funds inquiries.
- Profile Data, such as your username, security settings, preferences, feedback, and survey responses.
- Business Data, where you register a legal entity, such as business name, formation jurisdiction, taxpayer identification number, business activity, and beneficial ownership information.
- Support Data, such as information you provide through customer support, forms, or other correspondence.

1.2 Information We Collect Automatically

- Usage Information, including device identifiers such as IP address, pages and features used, and time and date of access.
- Transaction Information, including transaction amount, type, counterparty details you supply, and time and date.
- Location Data. We approximate your location from your IP address. Where you grant permission, a mobile application may collect device location. You can withdraw that permission at any time in your device settings.

- **Tracking Technologies.** We and our service providers use cookies and similar technologies to collect usage and device information, including IP address, browser type, platform and device type, operating system, timestamps, and unique device or account identifiers.

1.3 Information from Other Sources

- **Verification and Fraud Prevention Partners.** We receive verification outcomes, risk indicators, and fraud signals from identity verification and fraud prevention providers.
- **Regulated Service Providers.** We receive account status, verification status, transaction status, and settlement information from the licensed providers that support the Services.
- **Account Linking Providers.** Where you link an external bank account, we work with a bank account verification provider. Your use of that connection is subject to the provider's own terms and privacy policy, which are presented to you at the time you connect the account. We receive account ownership and status information sufficient to enable transfers.
- **Connected Services.** If you link or sign in using a third-party service, that service may send us profile information as authorized by your settings there.
- **Publicly Available Sources,** such as public records and publicly available web content, where used for verification or risk assessment.
- **Advertising Data,** relating to interactions with our marketing campaigns on other platforms.

1.4 Information We Deliberately Do Not Receive

Where identity verification is administered through a hosted flow operated by a licensed provider or its verification vendor, you submit information directly to that party. In that arrangement, TheCoinRamp does not receive or store:

- Your Social Security number or other taxpayer identification number.
- Images of your government-issued identification documents.
- Biometric data, including facial geometry derived from a verification selfie.

We receive only the verification outcome, the date, and an identifier linking that outcome to your account. The provider's handling of the underlying information is governed by that provider's privacy policy, which is presented to you before you submit it. Where a different verification method is used and we do receive such information directly, we handle it under this Policy and retain it only as long as required by law.

2. How We Use Information

- To provide, operate, and maintain the Services.
- To verify your identity and eligibility, and to satisfy our legal obligations under the Bank Secrecy Act, sanctions law, and applicable state law.
- To detect, investigate, and prevent fraud, money laundering, sanctions evasion, and other illicit activity.
- To process transactions and communicate with you about them.
- To provide customer support and respond to your inquiries.
- To maintain records required by law.
- To improve, personalize, and develop the Services.
- To send you service communications, and where permitted, marketing communications.
- To comply with lawful requests from regulators and law enforcement.

3. How We Share Information

3.1 Regulated Service Providers

We share information with the licensed providers that support the Services, as necessary for them to verify your identity, onboard you, process your transactions, hold your assets, and meet their own regulatory obligations. Where you enter into a separate agreement with such a provider, that provider's privacy policy governs its own use of your information.

3.2 Vendors and Service Providers

We share information with third parties that perform services for us, including identity verification, sanctions and watchlist screening, blockchain analytics, fraud prevention, cloud hosting, communications, analytics, and accounting. These parties are permitted to use the information only to perform services for us.

Where we use an identity verification provider to compare a photograph you submit against your government-issued identification, that provider may process biometric data. That processing is subject to the provider's terms, which are presented to you before you submit the information, and to applicable biometric privacy law.

3.3 Legal and Regulatory Purposes

We disclose information where we believe disclosure is required by or consistent with applicable law or legal process, including reports required under the Bank Secrecy Act, responses to subpoenas and regulatory examinations, and to protect the rights, interests, safety, and security of TheCoinRamp, our customers, or the public.

Confidential regulatory reporting

Certain reports we are required to file are confidential by law, and we are prohibited from disclosing their existence or content to you or to any unauthorized party. Where we are subject to such a restriction, we will not be able to explain the reason for an account action.

3.4 Corporate Transactions

We may share information in connection with a merger, acquisition, financing, reorganization, change of control, sale of assets, or insolvency proceeding.

3.5 With Your Consent

We share information for other purposes disclosed to you at the time we obtain your consent.

3.6 Aggregated and De-identified Information

We may share information in aggregated or de-identified form that does not reasonably identify you.

3.7 What We Do Not Do

- We do not sell your personal information.
- We do not share your information with securities issuers, and we do not hold securities positions for you.
- We do not share your information with unaffiliated third parties for their own marketing purposes.

4. Advertising and Analytics

We use third-party advertising and analytics services, including Google Analytics, to understand how the Services are used and to deliver advertising. These services collect information about your use of the Services and other sites over time through cookies, device identifiers, and similar technologies, including IP address, browser and device information, pages viewed, time spent, and links clicked.

For information about interest-based advertising and opt-out options, see www.aboutads.info/choices. You should also review your mobile device settings for controls over advertising identifiers.

We do not advertise or promote any specific investment, security, or digital asset. TheCoinRamp is not a broker-dealer or investment adviser and does not make recommendations.

5. Your Choices and Controls

5.1 Account Information

You may review and update certain profile information by signing in to your account. Some information, including verified identity information, cannot be changed without re-verification.

5.2 Device Permissions

You may withdraw a mobile application's access to device data, such as location or photo library, through your device settings.

5.3 Communications

You can stop receiving promotional email by using the unsubscribe link in those messages. We will continue to send service-related communications, including transaction confirmations, security notices, and account notifications, which are part of the Services.

5.4 Cookies

Most browsers accept cookies by default. You can set your browser to reject or delete them, though this may affect certain features. If you change devices or browsers, or clear cookies, you may need to set your preferences again.

5.5 Limits on Deletion

We are required by the Bank Secrecy Act and other law to retain certain records, generally for at least five years. We cannot delete information we are legally required to keep, even at your request. We will tell you when this applies to a request you make.

6. Data Retention

We retain personal information for as long as necessary to provide the Services and to satisfy our legal, regulatory, accounting, and reporting obligations. Records subject to Bank Secrecy Act retention requirements are held for a minimum of five years following the closure of your account or the date of the relevant transaction, whichever is later. Where we no longer have a legal or business reason to retain information, we delete or de-identify it.

7. Security

We maintain administrative, technical, and physical safeguards designed to protect your information, including encryption in transit and at rest, role-based access control, multi-factor authentication for administrative systems, and monitoring. No method of transmission or storage is completely secure, and we cannot guarantee absolute security. Notify us immediately at privacy@thecoinramp.com if you believe your account has been compromised.

8. Notice to California Residents

This section provides additional information for California residents under the California Consumer Privacy Act, as amended.

Much of the information we collect is nonpublic personal information subject to federal financial privacy law, which is exempt from the CCPA. The rights described below apply to information not otherwise exempt.

8.1 Categories Collected

In the preceding 12 months we collected the following categories: identifiers, such as name, email address, postal address, and IP address; financial information; internet and network activity information; geolocation data; and inferences drawn from the foregoing. Sources and purposes are described in Sections 1 through 3.

8.2 Your Rights

- The right to know the categories and specific pieces of personal information we have collected.
- The right to request deletion, subject to legal retention requirements described in Section 5.5.
- The right to correct inaccurate personal information.
- The right to opt out of any sale or sharing of personal information. We do not sell personal information.
- The right to limit use of sensitive personal information.
- The right not to be discriminated against for exercising these rights.

8.3 How to Exercise

Submit a request by signing in to your account and using the privacy controls, or by emailing privacy@thecoinramp.com. We will verify your request by asking for information that matches our records. You may designate an authorized agent, in which case we will require proof of authorization and may still verify your identity directly.

9. Other State Privacy Rights

Residents of states with comprehensive privacy laws may have similar rights of access, correction, deletion, and portability, and the right to opt out of targeted advertising. To exercise these rights, contact privacy@thecoinramp.com. As with California, information subject to federal financial privacy law or Bank Secrecy Act retention requirements may be exempt.

10. Children

The Services are not directed to and may not be used by anyone under 18. We do not knowingly collect information from anyone under 13. If we learn that we have collected personal information from a child under 13, we will take reasonable steps to delete it. If you believe we may hold information from a child under 13, contact privacy@thecoinramp.com.

11. Transfers of Information

The Services are designed for use only in the United States. If you access the Services from another jurisdiction, your information may be processed in the United States or other countries that may not provide levels of data protection equivalent to those of your home jurisdiction.

12. Changes to This Policy

We will update this Policy from time to time. When we do, we will revise the date below and post the updated Policy. Where changes are material, we will provide additional notice. We recommend reviewing this Policy periodically.

13. How to Contact Us

Purpose	Contact
Privacy questions and requests	privacy@thecoinramp.com
General support	support@thecoinramp.com
Mailing address	TheCoinRamp LLC, 30 N Gould St, Ste R, Sheridan, WY 82801

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