

# PRIVACY POLICY

**FIN.CLUB**

**Date: 20 February 2026**

*This Privacy Policy explains how Fin.Club collects, uses, shares, and protects personal data when you use the Fin.Club platform and ecosystem services.*

Version Control

Version 1      Creation      Date: 20 012 2026      Ownership: Board of Directors

## Table of Contents

Welcome.....	3
1. Data controller.....	3
2. Personal data we collect.....	3
2.1 Information you provide.....	3
2.2 Information we collect from your use of the Platform.....	3
2.3 Information we receive from third parties.....	4
3. How we use your data (and legal basis).....	4
3.1 Service delivery (contract necessity).....	4
3.2 Compliance (legal obligation).....	4
3.3 Security and risk management (legitimate interests).....	4
3.4 Communications.....	4
4. How we share your data.....	4
4.1 Within the Fin.Club ecosystem.....	4
4.2 With service providers and partners.....	5
4.3 With authorities.....	5
4.4 Counterparties and transparency.....	5
5. International transfers.....	5
6. Cookies.....	5
7. Data retention.....	5
8. How we protect your data.....	5
9. Your rights.....	6
10. Changes to this notice.....	6
11. Contact.....	6
Annexure- Data Sharing Consent Form.....	7

# Welcome

Fin.Club is an international financial ecosystem operating as a platform-based marketplace that brings together specialized financial institutions into a single coordinated infrastructure. The Platform provides access to international payment solutions, crypto transactions infrastructure, investment solutions, FX operations, and related services delivered by ecosystem members.

This notice applies to personal data processed when you access or use Fin.Club and Partners of FunClub published on its website, whether you are an individual user, a corporate client, or an authorized representative.

## 1. Data controller

In this notice, “Fin.Club”, “we”, “our” or “us” refers to the Fin.Club group entity (and/or relevant ecosystem member) providing you with a product or service and responsible for handling your personal data (the “data controller”).

Privacy contact details:

- Email: [compliance.group@fin.club](mailto:compliance.group@fin.club)
- Data protection contact: [compliance.group@fin.club](mailto:compliance.group@fin.club)
- Registered office: 80 Broad Street, Monrovia, Liberia

Where ecosystem services are integrated (for example, single login and internal transfers between products), more than one ecosystem entity may act as a controller or joint controller for the processing necessary to deliver that integration.

## 2. Personal data we collect

We collect the minimum personal data necessary to operate secure, compliant financial services. The data collection is legal due to the right of the contract. The Partners of Fin.Club are obliged to collect certain personal data due to their regulatory obligations.

### 2.1 Information you provide

- Profile and contact details (name, email, phone, address).
- Identification and verification data (date of birth, nationality, ID document details).
- Corporate and authority data (company details, signatories, beneficial ownership information).
- Source of funds / source of wealth information where required for compliance.

## **2.2 Information we collect from your use of the Platform**

- Transaction data (payments, transfers, beneficiary details, and related records).
- Wallet and digital asset transaction information where you use crypto services.
- Device and technical data (IP address, device identifiers, authentication logs, cookies).
- Usage data (how you interact with the Platform, for security and service improvement).

## **2.3 Information we receive from third parties**

- Identity verification, sanctions screening, and AML monitoring providers.
- Banks, payment networks, and regulated partners supporting transaction execution.
- Public and proprietary sources used for enhanced due diligence where required.

## **3. How we use your data (and legal basis)**

We process your personal data only where the law allows. Our main legal bases are: contract necessity, legal obligation, legitimate interests, and consent (where required).

### **3.1 Service delivery (contract necessity)**

- Create and manage accounts; authenticate users (including single login where available).
- Process international payments, transfers, and related instructions.
- Enable ecosystem functionality, including internal transfers between products where available.

### **3.2 Compliance (legal obligation)**

- KYC/AML onboarding and ongoing monitoring; sanctions and PEP screening.
- Travel Rule-related information processing for eligible crypto transactions.
- Regulatory reporting and recordkeeping.

### **3.3 Security and risk management (legitimate interests)**

- Fraud prevention, cybersecurity monitoring, and access control.
- Risk assessment to keep the Platform safe and resilient.

### **3.4 Communications**

- Service messages and support communications.
- Marketing only where permitted and, where required, based on your consent.

## **4. How we share your data**

We do not sell personal data. We share data only as necessary to provide services, meet legal obligations, and maintain security.

### **4.1 Within the Fin.Club ecosystem**

- To deliver integrated Platform services (e.g., single login, consolidated service experience).

- To execute internal transfers between ecosystem products where you request them.

#### **4.2 With service providers and partners**

- Payment processors, banks, and regulated financial partners that support transaction execution.
- Compliance, verification, and screening providers.
- IT, hosting, analytics (security-focused), and professional advisors where needed.

#### **4.3 With authorities**

- Regulators, law enforcement, courts, and competent authorities where disclosure is required by law or lawful request.

#### **4.4 Counterparties and transparency**

To support transaction transparency and audit expectations, limited identifying information may be shared with relevant transaction counterparties, banks, or service providers involved in executing your transaction, where necessary.

### **5. International transfers**

Fin.Club operates across multiple regions and may transfer personal data internationally. Where required, transfers are protected by appropriate safeguards such as contractual protections and data processing agreements.

### **6. Cookies**

We use cookies and similar technologies to keep the Platform secure, enable core functionality, and improve performance.

- Essential cookies: required for authentication and security.
- Functional cookies: remember preferences (where enabled).
- Analytics cookies: limited, security/performance-focused measurement (where enabled and required by law, based on consent).

### **7. Data retention**

We retain personal data for the duration of the relationship and then for regulatory retention periods (typically 7 years for financial and AML records), after which it is securely deleted or anonymized unless further retention is legally required.

### **8. How we protect your data**

We implement technical and organizational measures appropriate for financial services, including:

- Encryption in transit and at rest (where applicable).
- Multi-factor authentication and strong access controls.
- Monitoring, logging, and incident response procedures.
- Periodic audits and certification processes.

## 9. Your rights

Subject to applicable law (including GDPR where applicable), you may request:

- Access to your personal data.
- Correction of inaccurate or incomplete data.
- Erasure where legally permitted (noting regulatory retention requirements).
- Restriction or objection to processing in certain circumstances.
- Portability of data where applicable.
- Withdrawal of consent where processing is based on consent.

*To exercise your rights, contact [compliance.group@fin.club](mailto:compliance.group@fin.club). We may verify your identity before fulfilling a request.*

## 10. Changes to this notice

We may update this notice to reflect operational, legal, or regulatory changes. We will publish the updated notice with a revised “**Last Updated date**”. Continued use of the Platform constitutes acceptance of the updated notice.

## 11. Contact

- a) Fin.Club Privacy Team: [compliance.group@fin.club](mailto:compliance.group@fin.club)
- b) Data protection contact: [compliance.group@fin.club](mailto:compliance.group@fin.club)
- c) Registered office: 80 Broad Street, Monrovia, Liberia

## **Annexure - Data Sharing Consent Form**

### **Information Sharing Consent Form**

#### **Introduction**

This form grants consent to **FinClub** to collect and process personal data from you or your organisation (including data of directors, shareholders, and beneficial owners, if applicable, officers, counterparties, (jointly Data Subjects)), financial information, transactional information, and to share such data with the Partners of FunClub published on its website, for the purpose of providing financial services and fulfilling regulatory obligations.

#### **Personal Data Collected**

FinClub may collect identification data, contact information, financial transaction details, and compliance-related documents necessary for Know-Your-Customer (KYC), Anti-Money Laundering (AML) checks, and service execution.

#### **Purpose and Legal Basis**

Your data will be processed to:

- Provide services you have requested;
- Comply with legal obligations (e.g., AML/CFT laws);
- Facilitate operational and regulatory reporting. Processing is based on your consent, legal obligations, and FinClub's legitimate interest in providing its services.

#### **Sharing and Transfers**

FinClub will share your data with the Partners solely for the purposes listed above. Data may be stored or processed outside the UK or EU but with best practice appropriate safeguards.

#### **Statement of Consent:**

- We understand what personal information is held about us, what our rights as Data Subjects are, what the legitimate purpose of record keeping is, and why the sharing of information is done between the Partners of Fun.Club.
- We have secured the written data processing consents from our Data Subjects.
- We have had the opportunity to discuss the implications of sharing or not sharing information about us and the opportunity to receive independent legal advice on the matter.
- **We agree that personal information about us may be shared and gathered from/to the above Partners.**

**Your Rights**

You have the right to access, correct, or request deletion of your personal data, and to withdraw consent at any time by contacting FinClub.

**Declaration and Consent**

By signing below, you confirm that you understand and agree to the terms above, and you provide your explicit consent to FinClub for the collection, processing, and sharing of your data as described. You further confirm that you have legal authority to effect and sign this Consent.

Should you have any questions about this process, or wish to withdraw your consent please contact [compliance.group@fin.club](mailto:compliance.group@fin.club)