

# Privacy Policy

## CXXR Payment Stablecoin

**Effective Date:** January 10, 2026

**Last Updated:** January 10, 2026

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## 1. Introduction

CXXR, Inc. ("we," "our," or "us") is committed to protecting your privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use our payment stablecoin services, including the CXXR Wallet, minting, redemption, and transfer services (collectively, the "Service").

CXXR, Inc. is a permitted payment stablecoin issuer operating under the Guiding and Establishing National Innovation for U.S. Stablecoins Act of 2025 ("GENIUS Act"). Pursuant to GENIUS Act Section 6(a)(1)(B), we are deemed a financial institution for purposes of the Gramm-Leach-Bliley Act and maintain privacy safeguards accordingly.

By using the Service, you consent to the practices described in this Privacy Policy.

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## 2. Information We Collect

### 2.1 Identity Verification Information (KYC)

To comply with the Bank Secrecy Act and anti-money laundering requirements, we collect:

- **Personal Identifiers:** Full legal name, date of birth, Social Security Number or Tax Identification Number
- **Contact Information:** Email address, phone number, residential address
- **Government-Issued ID:** Copies of passport, driver's license, or other government-issued identification
- **Verification Photos:** Selfie or video for identity verification purposes
- **Source of Funds Information:** Employment information, source of funds for large transactions

### 2.2 Transaction Information

We collect information about your use of the Service, including:

- **Wallet Activity:** CXXR balance, transaction history, wallet addresses
- **Minting Transactions:** Amount, date, time, linked bank account information
- **Redemption Transactions:** Amount, date, time, destination bank account
- **Transfer Transactions:** Sender and recipient wallet addresses, amounts, timestamps
- **Blockchain Data:** Transaction hashes, block confirmations, on-chain records

### 2.3 Device and Access Information

When you access the Service, we automatically collect:

- **IP Address:** Your internet protocol address and geolocation data
- **Device Information:** Browser type, operating system, device identifiers, device model
- **Access Logs:** Date, time, and duration of access; pages visited; actions taken
- **Security Data:** Login attempts, authentication events, security alerts

## 2.4 Bank Account Information

If you link a bank account for minting or redemption, we collect:

- **Account Details:** Bank name, account number, routing number
- **Account Holder Information:** Name on account, account type
- **Verification Data:** Information required to verify account ownership

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## 3. How We Use Your Information

We use the collected information to:

### 3.1 Provide and Operate the Service

- Process minting, redemption, and transfer transactions
- Maintain your CXXR Wallet and account
- Provide customer support and respond to inquiries

### 3.2 Comply with Legal and Regulatory Requirements

- Verify your identity pursuant to Bank Secrecy Act requirements
- Conduct anti-money laundering (AML) screening and monitoring
- Screen transactions and users against sanctions lists (OFAC, etc.)
- File Suspicious Activity Reports (SARs) and Currency Transaction Reports (CTRs)
- Respond to valid legal requests from law enforcement and regulators
- Comply with GENIUS Act reporting and examination requirements

### 3.3 Maintain Security and Prevent Fraud

- Detect, prevent, and investigate fraud and unauthorized access
- Monitor for suspicious activity and policy violations
- Protect the integrity and security of the Service
- Enforce our Terms of Use

### 3.4 Improve the Service

- Analyze usage patterns to improve functionality
- Develop new features and services
- Conduct research and analytics

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## 4. Information Sharing and Disclosure

We do not sell your personal information. We may share information in the following circumstances:

### 4.1 Regulatory Authorities

We share information with our primary payment stablecoin regulator and other regulatory authorities as required by law, including:

- Examination and audit requests
- Suspicious Activity Reports and Currency Transaction Reports
- Regulatory inquiries and investigations

### 4.2 Law Enforcement

We disclose information in response to:

- Subpoenas, court orders, and other valid legal process
- Requests from law enforcement agencies
- National security letters and other government requests

### **4.3 Service Providers**

We share information with third-party vendors who assist in operating the Service, including:

- Identity verification providers
- Banking and payment processors
- Cloud hosting and infrastructure providers
- Security and fraud prevention services
- Customer support platforms

All service providers are bound by confidentiality agreements and may only use your information to provide services to us.

### **4.4 Blockchain Networks**

Transaction information, including wallet addresses and transaction amounts, is recorded on blockchain networks and may be publicly visible. We do not control information once it is recorded on a public blockchain.

### **4.5 Business Transfers**

In connection with a merger, acquisition, bankruptcy, or sale of assets, your information may be transferred to the acquiring entity, subject to applicable privacy laws.

### **4.6 With Your Consent**

We may share information for other purposes with your explicit consent.

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## **5. Customer Protection and Asset Segregation**

### **5.1 Segregation of Customer Data**

Pursuant to GENIUS Act Section 8, we maintain appropriate safeguards to protect your information from unauthorized access and ensure your assets are segregated from our corporate assets.

### **5.2 No Commingling**

Your personal information and transaction records are separately maintained and are not commingled with our corporate records in a manner that would compromise your privacy or asset protection.

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## **6. Data Security**

We implement appropriate technical and organizational measures to protect your information, including:

- **Encryption:** Data encrypted in transit (TLS) and at rest (AES-256)
- **Access Controls:** Role-based access controls and multi-factor authentication
- **Monitoring:** 24/7 security monitoring and intrusion detection
- **Audits:** Regular security assessments and penetration testing
- **SOC 2 Type II:** Annual SOC 2 Type II audits of our security controls

However, no method of transmission over the internet or electronic storage is 100% secure, and we cannot guarantee absolute security.

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## 7. Data Retention

We retain your information for as long as necessary to:

- Maintain your account and provide the Service
- Comply with legal and regulatory requirements
- Resolve disputes and enforce our agreements

### 7.1 Regulatory Retention Requirements

Under the Bank Secrecy Act and related regulations, we are required to retain:

- Customer identification records for at least 5 years after account closure
- Transaction records for at least 5 years
- Suspicious Activity Reports and supporting documentation for at least 5 years

### 7.2 Blockchain Records

Transaction data recorded on blockchain networks is permanent and cannot be deleted.

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## 8. Your Rights

Depending on your jurisdiction, you may have the right to:

- **Access:** Request a copy of the personal information we hold about you
- **Correction:** Request correction of inaccurate or incomplete information
- **Deletion:** Request deletion of your information, subject to legal retention requirements
- **Portability:** Request transfer of your information to another service
- **Restriction:** Request that we limit processing of your information
- **Objection:** Object to certain types of processing

### 8.1 Limitations on Rights

Your rights may be limited where:

- We are required by law to retain information (e.g., Bank Secrecy Act requirements)
- Deletion would interfere with fraud prevention or security measures
- Information is recorded on public blockchain networks

### 8.2 How to Exercise Your Rights

To exercise your rights, please contact us at [privacy@cxxr.net](mailto:privacy@cxxr.net). We will respond within 30 days. We may require identity verification before processing your request.

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## 9. International Data Transfers

Your information may be transferred to and processed in the United States and other countries. We ensure appropriate safeguards are in place for such transfers in compliance with applicable data protection laws.

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## 10. Cookies and Tracking Technologies

### 10.1 Essential Cookies

We use essential cookies necessary for the operation of the Service, including:

- Session management and authentication
- Security features and fraud prevention
- Service functionality

### 10.2 Analytics

We may use analytics tools to understand how users interact with the Service. You may opt out of analytics tracking in your account settings.

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## 11. Children's Privacy

The Service is not intended for individuals under the age of 18. We do not knowingly collect personal information from children. If we learn we have collected information from a child under 18, we will delete it promptly.

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## 12. California Privacy Rights

If you are a California resident, you have additional rights under the California Consumer Privacy Act (CCPA), including:

- Right to know what personal information is collected, used, and disclosed
- Right to request deletion of personal information
- Right to opt out of sale of personal information (we do not sell personal information)
- Right to non-discrimination for exercising privacy rights

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## 13. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. Material changes will be posted on our website with at least 30 days' notice before taking effect. Your continued use of the Service after changes take effect constitutes acceptance of the revised policy.

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## 14. Contact Us

If you have questions about this Privacy Policy or our privacy practices, please contact us at:

### **CXXR, Inc.**

Email: [privacy@cxxr.net](mailto:privacy@cxxr.net)  
Website: [cxxr.net/privacy](http://cxxr.net/privacy)

For data protection inquiries:  
Data Protection Officer  
Email: [dpo@cxxr.net](mailto:dpo@cxxr.net)

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