

Privacy Policy

Data protection, confidentiality and user verification policy

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Issuer	Trnznd SA, a sociedad anonima incorporated under the laws of the Republic of Panama
Website	www.trnznd.io

Trnznd SA ("Trnznd", "we", "us", or "our") is committed to protecting the privacy, confidentiality, and security of personal information entrusted to us by our users. This Privacy Policy explains how Trnznd collects, uses, stores, protects, and, where strictly necessary, discloses personal information in connection with the use of the Trnznd platform, ZEND, and related services.

Privacy Principles

- Information is used only for its intended purpose.
- Information is never provided to third parties for marketing.
- Access is restricted to duly authorised and appropriately qualified Trnznd personnel.
- Personal information is retained for no longer than seven years after the relationship ends, unless a longer period is legally required.

1. Introduction

Trnznd believes that personal information should only be collected for legitimate business and compliance purposes, used only for its intended purpose, and protected to the highest standards reasonably available.

This Privacy Policy applies to information collected from users, prospective users, authorised representatives, beneficial owners, controllers, and other persons whose information is supplied to Trnznd in connection with onboarding, verification, platform access, transaction verification, compliance, or related services.

2. Information We Collect

Trnznd may collect personal, corporate, financial, and verification information that is necessary to validate users of the Trnznd system and to support onboarding and ongoing transaction verification.

- Full name and contact information.
- Date of birth and residential address.

- Government-issued identification documents.
- Corporate registration, beneficial ownership, and control information.
- Proof of address documentation.
- Source of funds or source of wealth information where required.
- Wallet addresses and transaction-related information.
- Communications submitted to Trnznd.

Trnznd will only collect information that is reasonably necessary for the purposes described in this Privacy Policy.

3. How We Use Information

All information supplied to Trnznd is used solely for its intended purpose. The primary purposes for which information is collected and processed are user validation, onboarding, ongoing transaction verification, risk management, platform security, and compliance with applicable legal obligations.

- User identification and verification.
- Know Your Customer (KYC) procedures.
- Anti-Money Laundering (AML) and sanctions screening requirements.
- Ongoing customer due diligence.
- Transaction monitoring and verification.
- Fraud prevention and platform security.
- Administration of the relationship between Trnznd and the User.

Trnznd does not collect personal information for advertising purposes and does not use personal information to create marketing profiles.

4. Disclosure of Information

Trnznd maintains a strict policy of confidentiality. Trnznd does not sell, rent, licence, trade, share, or otherwise disclose personal information to third parties except in the limited circumstances set out below.

4.1 Service Fulfilment

Information may be disclosed only where strictly necessary to fulfil Trnznd's obligations to a User, including the provision, operation, security, administration, or compliance support of the platform and related services. Any such disclosure shall be limited to the minimum information required for the specific purpose.

4.2 Legal Requirement

Information may be disclosed where required pursuant to a court order, a legally binding request from a competent governmental authority, applicable law or regulation, legal proceedings, or enforcement actions. Unless prohibited by law, Trnznd may seek to limit the scope of any disclosure to the minimum information legally required.

4.3 No Marketing Disclosure

Under no circumstances will user information be provided to third parties for marketing, advertising, promotional, data brokerage, or similar commercial purposes.

5. Data Access Controls

Access to user information is strictly controlled. Personal information may only be accessed by duly authorised and appropriately qualified personnel within Trnznd who require access for the performance of their responsibilities.

Such access is limited to the purposes for which the information was originally collected, including user onboarding, identity verification, compliance reviews, transaction verification, risk management, and security activities. All personnel with authorised access are subject to confidentiality obligations and internal security controls.

6. Data Security

Trnznd maintains technical, organisational, and administrative safeguards designed to protect personal information against unauthorised access, disclosure, alteration, misuse, loss, theft, or destruction.

While no electronic storage or transmission system can be guaranteed to be completely secure, Trnznd employs reasonable measures appropriate to the nature and sensitivity of the information it holds.

7. Data Retention

Trnznd retains personal information only for as long as necessary to fulfil the purposes for which it was collected and to comply with legal, regulatory, operational, and contractual obligations.

Unless a longer retention period is required by applicable law, court order, regulatory requirement, or legal process, personal information will be retained for no longer than seven (7) years following the termination of the relationship between Trnznd and the User.

Following the expiry of the applicable retention period, information will be securely deleted, anonymised, or otherwise disposed of in accordance with Trnznd's data management procedures.

8. User Rights

Subject to applicable law, users may request confirmation of whether Trnznd holds their personal information, access to personal information held by Trnznd, correction of inaccurate information, updating of outdated information, deletion of information where legally permissible, or withdrawal of consent where processing is based upon consent.

Trnznd may decline requests where retention or processing is required by law, regulation, legal process, fraud prevention requirements, compliance obligations, or legitimate operational requirements.

9. International Transfers

Where operationally necessary, information may be processed and stored in jurisdictions other than the user's country of residence. In all cases, Trnznd will seek to ensure that personal information receives an appropriate level of protection consistent with the principles set out in this Privacy Policy.

10. Changes to this Policy

Trnznd may amend this Privacy Policy from time to time to reflect changes in legal requirements, operational practices, security standards, or business activities. The most current version will be published through Trnznd's official channels and will become effective upon publication unless otherwise stated.

11. Contact

Questions regarding this Privacy Policy or the handling of personal information may be directed to:

Entity	Trnznd SA
Email	legal@trnznd.io
Website	www.trnznd.io

By using the Trnznd platform, users acknowledge that they have read and understood this Privacy Policy.