

Privacy & Data Protection Notice

PAA CAPITAL LLC

COMPANY	PAA CAPITAL LLC, a Montana limited liability company (Secretary of State file no. C1656946)
REGISTERED OFFICE	1001 S Main St, Ste 49, Kalispell, MT 59901, USA
STATUS	Money services business registered with the U.S. Financial Crimes Enforcement Network (FinCEN), MSB Registration No. 31000344044610
CONTACT	support@paacapital.com · compliance@paacapital.com · dpo@paacapital.com · +1 305 850 6564
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Who we are

Controller: PAA CAPITAL LLC, 1001 S Main St, Ste 49, Kalispell, MT 59901, USA (and, where indicated, its affiliates within PAA CAPITAL GROUP). PAA CAPITAL LLC is a money services business registered with FinCEN, MSB Registration No. 31000344044610. EU representative (Art. 27 GDPR): PAA CAPITAL SE, Ludwigsplatz 5, 67547 Worms, Germany (Amtsgericht Mainz, HRB 55019). Data Protection Officer: dpo@paacapital.com

1) Scope

This Notice explains how we collect, use, disclose, transfer and retain your personal data when you use our Services or interact with us. It applies to applicants, customers, authorized users and representatives. Additional notices may apply to specific features.

2) Data We Collect

- Identification: name, date of birth, passport or national ID, proof of address, tax numbers, photos and biometric data used for identity verification (selfie match), PEP and sanctions screening results.
- Contact & profile: email, phone, addresses, employer, role.
- Financial & transactional: account numbers, payment instructions, beneficiaries, balances, statements, foreign exchange, virtual-asset wallet addresses, device and IP data, approximate location, logs.
- Support & communications: messages, emails, recorded calls (where permitted), complaints.
- Device & usage: cookies, telemetry, diagnostics, fraud signals.

3) Why We Use Your Data

- To provide the Services and manage your account (performance of a contract).
- To comply with law, including identity verification, AML/CFT, sanctions screening, tax, audit and reporting obligations (legal obligation).
- For security and fraud prevention (our legitimate interests).
- To improve the Services, using aggregated or pseudonymized data where possible (our legitimate interests).
- For marketing, only with your opt-in consent.
- To protect vital interests in rare emergencies.



4) Automated Decisions

We use automated tools, such as fraud and AML risk scoring, that may affect your access to the Services. You may request human review, express your point of view and contest the decision, unless exceptions apply by law.

5) Sharing Your Data

We share personal data with:

- service providers and processors (cloud hosting, identity verification, payments, communications, analytics);
- banks, payment networks and counterparties to execute your orders;
- affiliates within PAA CAPITAL GROUP that support our operations, under appropriate safeguards;
- regulators, law enforcement and competent authorities, and other third parties where required by law.

We do not sell personal data, and we do not share your nonpublic personal information with non-affiliated third parties for their own marketing.

6) International Transfers

Your data may be processed in, or transferred to, countries other than your country of residence, including the United States. Where the GDPR applies, we use lawful transfer mechanisms, such as the EU Standard Contractual Clauses, and appropriate safeguards.

7) Retention

We keep data only as long as necessary for the purposes above, subject to legal retention duties. Identification and transaction records are kept for at least five (5) years, as required by the U.S. Bank Secrecy Act, and longer where other laws require it. After that, we securely delete or irreversibly anonymize the data.

8) Your Rights

Subject to legal limits, you can:

- access your data and obtain a copy;
- correct inaccurate or incomplete data;
- request erasure;
- restrict or object to processing;
- receive certain data in a machine-readable format (portability);
- withdraw consent (for example for marketing) at any time;
- complain to the data protection supervisory authority in your country (EU/EEA) or another competent authority.

Residents of U.S. states with consumer privacy laws may have additional rights under those laws. To exercise your rights, contact dpo@paacapital.com. We may need to verify your identity.

9) Children

Our Services are not directed to children, and we do not knowingly collect data of minors.

10) Security

We apply administrative, technical and physical safeguards appropriate to the risk, including encryption in transit and at rest where applicable, access controls, logging and two-factor authentication. No system is 100% secure; please notify us promptly of any suspected compromise.

11) Cookies & Similar Technologies

We use necessary cookies for functionality and security. Non-essential analytics or marketing cookies are used only with your consent and can be managed in the cookie banner or your browser settings. See our Cookie Policy for details.



12) How We Contact You

We send service messages in the platform, by email or by SMS. Marketing is sent only if you opt in, and you can opt out at any time.

13) Changes to this Notice

We may update this Notice. Material changes will be notified in the platform or by email. Continued use after the effective date means you acknowledge the changes.

14) Contact Us

Data protection queries: dpo@paacapital.com PAA CAPITAL LLC, 1001 S Main St, Ste 49, Kalispell, MT 59901, USA