

Privacy Policy

TuCambio platform, U.S. users and access to services provided by regulated partners

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1. Controller and contact

TCX TECH GROUP, S.L., NIF ESB26910901, with registered address at PS/DE LA CASTELLANA 194, 28046 MADRID, Spain, is the controller of personal data processed for the TuCambio Platform activities described in this Policy. Privacy and data-protection requests may be sent to compliance@tucambio.app. General support may be contacted at contact@tucambio.app.

TCX is established in Spain and processes personal data under the EU General Data Protection Regulation, Spanish data-protection law and applicable U.S. federal and state privacy laws. The exact legal basis and rights may vary according to the User, data, purpose and jurisdiction.

2. Scope and separate privacy roles

This Policy applies to visitors, applicants, individual and business users, representatives, beneficial owners, contacts, payers, recipients and other persons whose information is processed through the Platform.

Regulated Partners may act as independent controllers, financial institutions or service providers for their own products. Before TCX sends data for product activation, the Platform will identify the applicable provider and make its privacy notice available. That notice governs the provider's independent processing.

3. Personal data we may collect

- identifiers and contact data: name, email, telephone number, postal address, username and account identifiers;
- government and tax identifiers: passport, driver's license, national identity document, Social Security number, employer identification number or other taxpayer identifier;
- demographic and eligibility data: date of birth, nationality, residency, immigration or tax residency information and legally required classification information;
- business and professional data: company name, formation documents, address, industry, role, authority, ownership, beneficial owners, directors and employees;
- financial and transaction data: bank details, card-related data where permitted, wallet addresses, balances shown by a partner, transaction amounts, currencies, recipients, payers, references, invoices, source and destination of funds and purpose;
- compliance and risk data: identity-verification results, politically exposed person status, sanctions and watchlist results, fraud indicators, adverse information, source of wealth and supporting records;
- biometric and verification data: selfie, facial image, liveness result, document image and technical templates used to prevent impersonation, when permitted and separately disclosed;
- device and online data: IP address, device identifiers, browser, operating system, approximate location, login records, cookies, tags, event logs and security signals;
- communications: emails, chat, support tickets, call recordings where lawfully recorded, complaints, surveys and documents submitted;
- inferences and analytics: risk indicators, product preferences, engagement, likely fraud, account health and aggregated statistics.

4. Sources of personal data

- directly from you or the business you represent;
- from payers, recipients, authorized representatives, beneficial owners or other participants in a Transaction;
- from Affiliates and Regulated Partners involved in the Platform or a selected product;
- from financial institutions, payment networks, wallet providers and transaction participants;
- from identity, biometric, fraud-prevention, sanctions, compliance and cybersecurity providers;
- from public records and lawfully available databases;
- from cookies, devices and use of the Website or Platform.

5. Purposes of processing

- create, authenticate, secure and administer a TuCambio Platform account;
- verify identity, authority, business ownership and product eligibility;
- present products, obtain quotations and transmit applications or instructions to the applicable Regulated Partner;
- display transaction status, balances, statements, receipts or reconciliation information received from a partner;
- provide support, handle complaints, investigate errors and recover or return funds when coordinated with a provider;
- prevent fraud, identity theft, money laundering, terrorist financing, sanctions violations and cybersecurity incidents;
- comply with legal, regulatory, tax, accounting, audit, recordkeeping and law-enforcement obligations;
- operate, test, troubleshoot, protect and improve the Platform;
- communicate operational, security and legal information;
- conduct analytics and, with required consent or opt-out rights, marketing and targeted advertising;
- establish, exercise or defend legal claims and enforce agreements.

6. Legal bases under European law

Depending on the purpose, TCX relies on one or more of the following legal bases: performance of a contract or pre-contractual steps; compliance with legal obligations; legitimate interests such as security, fraud prevention, support and product improvement; consent for activities that require it, including certain cookies, biometrics or marketing; and establishment, exercise or defense of legal claims.

Where information is required to create an account, verify identity or access a product, failure to provide it may prevent TCX or a Regulated Partner from proceeding.

7. Disclosures to Regulated Partners

TCX may disclose application, identity, compliance, transaction and technical data to a Regulated Partner when necessary to evaluate eligibility, open or administer the partner account, execute Transactions, satisfy legal obligations, prevent fraud, provide support or resolve complaints.

The provider's legal name, role, privacy notice and material data-use disclosures will be shown before activation. A Regulated Partner may request additional data directly and may retain records under financial-services, anti-money-laundering, tax, sanctions or payment-network rules.

8. Other categories of recipients

- Affiliates and group companies providing technology, support, compliance, finance, administration or customer service in Spain, Chile, Peru and other jurisdictions;
- cloud hosting, communications, CRM, customer-support, identity, biometric, analytics, cybersecurity and fraud-prevention vendors;
- banks, payment networks, card networks, digital-asset networks and other transaction participants;
- professional advisers, auditors, insurers and prospective or actual corporate transaction counterparties;
- courts, regulators, tax authorities, law enforcement and public bodies where disclosure is required or lawful;
- advertising and analytics providers, subject to consent and opt-out rights described below.

TCX requires service providers acting on its behalf to process data under appropriate contractual, confidentiality and security obligations.

9. International data transfers

Personal data may be processed in Spain, the United States, Chile, Peru and other countries where TCX, its Affiliates, vendors or Regulated Partners operate. These countries may have different privacy laws.

For transfers subject to the GDPR, TCX uses an adequacy decision where available, the European Commission's Standard Contractual Clauses, supplementary safeguards or another lawful transfer mechanism. Users may request information about applicable safeguards, subject to confidentiality and legal restrictions.

10. U.S. state privacy notice

10.1. Categories collected and business purposes

During the preceding twelve months, TCX may have collected the categories described in Section 3, including identifiers, customer-record information, commercial information, internet or electronic network activity, approximate geolocation, audio or visual information, professional information, inferences and sensitive personal information. TCX uses these categories for the purposes described in Section 5 and retains them as described in Section 14.

10.2. Sale, sharing and targeted advertising

TCX does not sell personal information for monetary consideration. Depending on the Website tools enabled, disclosure of cookies, online identifiers or activity data to advertising or analytics providers may be treated as a "sale," "sharing" or targeted advertising under certain U.S. state laws. Where applicable, Users may opt out through the cookie preference center, a "Do Not Sell or Share My Personal Information" link or a recognized opt-out preference signal such as Global Privacy Control.

TCX does not knowingly sell or share the personal information of persons under eighteen. Sensitive personal information used for identity, security, compliance or financial-service access is not used for cross-context behavioral advertising.

10.3. Rights available under applicable state law

Subject to legal exceptions and state-specific eligibility, a U.S. resident may have the right to:

- confirm whether TCX processes personal data and access or obtain a portable copy;
- correct inaccurate personal data;
- delete personal data;
- obtain information about categories, purposes, sources and recipients;

- opt out of sale, sharing, targeted advertising or certain profiling;
- limit certain uses of sensitive personal information;
- appeal a denied privacy request;
- receive equal service and not be discriminated against for exercising privacy rights.

Rights differ by state and may not apply to data exempt under financial, employment, business-to-business, fraud-prevention or other laws. TCX will respond according to the law applicable to the verified requester.

10.4. California-specific information

California residents may request the categories and specific pieces of personal information collected, correction, deletion, portability, and information regarding disclosure, sale or sharing. They may use an authorized agent, subject to verification. TCX will honor Global Privacy Control where legally required and technically recognized. California residents may also request information about certain direct-marketing disclosures where applicable.

11. GDPR

A person whose data is subject to the GDPR may request access, rectification, erasure, restriction, portability, objection and withdrawal of consent. The person may also object to direct marketing and, where applicable, request review of a decision based solely on automated processing that produces legal or similarly significant effects.

Withdrawal of consent does not affect prior lawful processing. Some data cannot be deleted while required for compliance, fraud prevention, accounting, legal claims or product administration.

12. Sensitive data and biometrics

Government identifiers, financial account details, precise location, biometric data and certain compliance information may be considered sensitive. TCX uses such data only when necessary for identity verification, security, legal compliance, product access, fraud prevention or another disclosed purpose. Biometric processing will be subject to additional notice or consent where required.

13. Automated review and profiling

TCX and Regulated Partners may use automated tools to detect fraud, assess identity consistency, screen sanctions, prioritize reviews, set security controls or determine product eligibility. These tools may result in additional verification, delayed processing, restriction or referral to a human reviewer. Where applicable law provides a right to opt out or obtain review of a significant automated decision, TCX will provide a method to exercise that right.

14. Retention

TCX retains data only as long as reasonably necessary for the purposes described, including the life of the account, completion of Transactions, customer support, security, audit, legal claims and statutory retention. Identity, compliance, transaction and acceptance records may be retained for extended periods required by financial-services, anti-money-laundering, tax, limitation or regulatory rules, even after account closure.

Retention periods depend on data type, sensitivity, legal obligations, partner requirements and risk. Data is deleted, anonymized or restricted when no longer required.

15. Security

TCX uses administrative, technical and organizational measures designed to protect data, including access controls, encryption in transit where appropriate, logging, vendor review, incident procedures and staff confidentiality. No system is completely secure, and Users must protect credentials and promptly report suspected compromise.

16. Children

The Platform is not directed to persons under eighteen and TCX does not knowingly create accounts for minors. If TCX learns that a minor provided personal data without lawful authorization, it will take appropriate steps to delete or restrict it, subject to legal duties.

17. Cookies, advertising choices and privacy signals

Cookies and similar technologies are described in the Cookie Policy. Non-essential cookies are controlled through the consent and preference tools. TCX will honor legally recognized opt-out preference signals where required. A browser's general "Do Not Track" setting may not have a uniform legal meaning, but Global Privacy Control may be treated as an opt-out request under applicable law.

18. Exercising privacy rights

Submit a request to compliance@tucambio.app and state the right and jurisdiction involved. TCX may request information necessary to verify identity, authority or residency. Authorized agents may be required to provide signed permission and the requester may be asked to verify directly.

TCX generally does not charge for reasonable requests, but may decline or charge as permitted for excessive, repetitive, unfounded or technically disproportionate requests. Appeals of denied U.S. state requests may be sent to the same address with the subject "Privacy Appeal."

19. Complaints

A person may complain to TCX through the compliance contact. Persons protected by the GDPR may also lodge a complaint with the Spanish Data Protection Agency or another competent European supervisory authority. U.S. residents may contact the state attorney general or privacy regulator with jurisdiction over their complaint.

Complaints concerning a Regulated Partner's independent processing should also be directed to that provider using the channels in its privacy notice.

20. Changes to this Policy

TCX may update this Policy to reflect changes in law, technology, products, recipients or processing. The updated date will appear above. Material changes may be communicated through email, Platform notice or renewed consent where required.

21. Contact

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