# Privacy Policy

How personal data is collected, used and protected.

| VERSION | LAST UPDATED | STATUS |
| --- | --- | --- |
| 0.1 | November 17, 2026 | Draft |

## 1. Who we are

[Issuer legal entity name] ("we") is responsible for personal data processed in connection with USD Neo (USDN) and neosmartchain.com. Contact for privacy matters: [privacy contact email].

## 2. Data we collect

| Category | Examples | When |
| --- | --- | --- |
| Onboarding data | Name, date of birth, address, government ID, business documents | When a participant applies to mint or redeem |
| Transaction data | Wallet addresses, amounts, transaction hashes, bank details | When minting, redeeming or contacting support |
| Website data | IP address, device and browser information, pages visited | When you visit this website |
| Communications | Messages you send to us | When you contact us |

Public blockchain data, such as balances and transfers between addresses, is visible to everyone and cannot be erased by us.

## 3. How we use data

- To verify identity and meet anti-money-laundering and sanctions obligations.
- To process minting, redemption and support requests.
- To secure the website and detect fraud or abuse.

- To understand how the website is used and improve it.
- To comply with legal obligations and respond to authorities.

## 4. Sharing

We share data only with service providers acting for us, such as identity verification providers, custodians, banks, auditors, analytics and hosting providers, and with authorities where the law requires. We do not sell personal data.

## 5. Retention and security

We keep personal data only as long as needed for the purposes above and for the period required by law, which for identity and transaction records is usually [confirm: retention period, for example five years] after the relationship ends. We use encryption, access controls and monitoring to protect data, but no system is completely secure.

## 6. Your rights

Depending on where you live, you may have the right to access, correct, delete or export your personal data, to object to or restrict certain processing, and to complain to your data protection authority. Contact us to exercise these rights. Some data must be kept to meet legal obligations.

## 7. International transfers and updates

Data may be processed in countries other than your own. Where required, we use safeguards such as standard contractual clauses. We will publish changes to this policy on this page with an updated version and date.

This document is for information only and is not financial, legal or tax advice. Highlighted items in square brackets are still to be confirmed by the issuer. The latest version is always available at neosmartchain.com/tokens/usdn/docs/privacy