



1. ABOUT THIS NOTICE

This Privacy Notice ("Notice") applies to all personal information collected by Atlantic Xchange LLC through our website at www.atlanticxchange.com, our mobile application, and any other Atlantic Xchange-owned platform or service that links to this Notice. It explains what information we collect, why we collect it, how we use and protect it, who we share it with, and what rights you have over your data.

This Notice should be read together with our Customer Service Agreement and E-Sign Agreement, which are incorporated by reference. Capitalized terms not defined here carry the same meaning as in our Customer Service Agreement.

If you have questions about this Notice, please contact us at:

Atlantic Xchange LLC

Attn: Privacy and Compliance

5846 Schaefer Rd, Dearborn, MI 48126

Email: customerservice@atlanticxchange.com

Phone: 1-888-444-3962

2. WHO WE ARE

Atlantic Xchange LLC is a limited liability company headquartered in Michigan and registered as a Money Services Business (MSB) with the Financial Crimes Enforcement Network (FinCEN). We hold money transmitter licenses in the states of Florida, Georgia, Illinois, Maryland, Michigan, New Jersey, New York, North Carolina, Texas, and Virginia.

Atlantic Xchange LLC is the sole controller of all personal information collected through our services. We do not have parent companies, subsidiaries, or affiliated entities that share in the control of your data. All data collected through our platform is held and managed by Atlantic Xchange LLC in the United States.

3. WHAT PERSONAL INFORMATION DO WE COLLECT?

The personal information we collect depends on how you interact with our services. We collect only what is necessary to provide our services and comply with our legal obligations. The categories of personal information we may collect include:

3.1 Identity and Contact Information

Your full legal name, residential address, date of birth, email address, phone number, occupation, and employer name and address. This information is required to open and maintain your account.

3.2 Government-Issued Identification

A copy of your government-issued photo ID such as a driver's license, state ID card, or passport. We may also collect your Social Security Number (SSN) or Individual Taxpayer Identification Number (ITIN), proof of address documents such as a utility bill or bank statement, and documentation of your source of funds where required by law.

3.3 Payment Information

Your bank account details or debit and credit card information used to fund your transfers. We do not store full card numbers payment data is tokenized and handled by our PCI-compliant payment processors.

3.4 Transaction Information

Details of every transfer you initiate or receive, including the transfer amount, destination country, recipient information, stated purpose of transfer, transaction reference number, and timestamps. This information is retained as required by federal and state law.

3.5 Recipient Information

The full name, phone number, and financial account details of the individuals you send money to. We collect this information to complete your transfer and to comply with our AML and sanctions screening obligations.

3.6 Communications and Support Information

Records of any communications between you and our customer service team, including emails, phone call logs, and chat transcripts. Calls may be recorded for quality assurance and compliance purposes.

3.7 Technical and Device Information

Information about the device and software you use to access our services, including your IP address, device type, operating system, browser type, unique device identifiers, and general location data derived from your IP address. We also collect information about how you interact with our website and app, such as pages visited, features used, and session duration.

3.8 Survey and Feedback Information

If you choose to participate in a survey, leave a review, or provide feedback, we collect the information you submit, including your name, email address, and responses.

4. HOW DO WE COLLECT YOUR INFORMATION?

We collect personal information through the following means:

4.1 Directly From You

When you register for an account, initiate a transfer, contact our customer service team, respond to a survey, or otherwise interact with our services, you provide us with personal information directly.

4.2 Automatically Through Technology

When you visit our website or use our mobile app, we automatically collect certain technical and usage information through cookies, web beacons, pixels, and similar tracking technologies.

4.3 From Third Parties

We may receive information about you from trusted third-party sources, including identity verification providers, fraud prevention services, credit reporting agencies, and government databases. We use this information to verify your identity, screen against sanctions lists, and comply with our AML obligations. We do not purchase marketing data about you from data brokers.

5. HOW DO WE USE YOUR INFORMATION?

Atlantic Xchange uses your personal information for the following purposes:

5.1 To Provide Our Services

We use your information to open and manage your account, process your money transfers, verify your identity, communicate with you about your transactions, and deliver customer support.

5.2 To Comply With Legal and Regulatory Obligations

As a licensed money services business, we are required by federal and state law to collect, verify, and retain certain personal information. This includes compliance with the Bank Secrecy Act (BSA), anti-money laundering (AML) regulations, OFAC sanctions screening, FinCEN reporting requirements, and state money transmitter licensing obligations. We cannot process your transfers without collecting this information.

5.3 To Detect and Prevent Fraud

We use your information to identify, investigate, and prevent fraudulent, suspicious, or unlawful activity. This includes automated transaction monitoring, identity verification, and sanctions screening on every transfer.

5.4 To Communicate With You

We use your contact information to send you transaction receipts and confirmations, account notifications, error resolution updates, and legally required disclosures. We may also send you information about our services and promotions where you have not opted out.

5.5 To Improve Our Services

We use technical and usage information to understand how our customers use our platform, identify areas for improvement, and develop new features. This analysis is conducted on an aggregated or de-identified basis where possible.

5.6 To Fulfill Reporting Obligations

Where required by law, we use your information to file Currency Transaction Reports (CTRs) with FinCEN for qualifying cash transactions, Suspicious Activity Reports (SARs) where suspicious activity is identified, and other regulatory reports as required by applicable law or our licensing obligations.

6. AUTOMATED DECISION-MAKING

Atlantic Xchange uses automated processes to screen transactions and customer accounts. These processes may result in an automated decision to place a transfer on hold, decline a transaction, flag an account for review, or restrict access to our services. Automated decisions are made based on factors including sanctions list matches, fraud indicators, AML risk scoring, and transaction pattern analysis.

If you believe an automated decision has incorrectly affected your account or a specific transaction, you may contact our compliance team at compliance@atlanticxchange.com to request a manual review. We will investigate and respond within 10 business days.

7. WHO DO WE SHARE YOUR INFORMATION WITH?

Atlantic Xchange does not sell your personal information to third parties. We share your information only as described below:

7.1 Service Providers

We share your information with third-party service providers who assist us in delivering our services. These include identity verification providers, payment processors, payout partners and correspondent banks, fraud detection and AML screening vendors, cloud hosting and data storage providers, customer communication platforms, and IT security and compliance tools. All service providers are contractually required to use your information only for the purpose of performing services on our behalf and to maintain appropriate data security standards.

7.2 Regulatory and Law Enforcement Authorities

We share information with FinCEN, OFAC, state banking regulators, and law enforcement agencies as required by applicable law. This includes mandatory reporting obligations such as CTR and SAR filings. We may not be able to notify you when such disclosures are made, as doing so may be prohibited by law.

7.3 Payout Partners

To complete your transfer, we share recipient and transaction information with our network of correspondent banks and payout agents in destination countries. These partners are required to handle your information in accordance with applicable financial regulations.

7.4 Legal Proceedings

We may disclose your information in response to a subpoena, court order, government investigation, or other lawful legal process. We will make reasonable efforts to notify you of such requests where permitted by law.

7.5 Business Transfers

In the event that Atlantic Xchange LLC is involved in a merger, acquisition, sale of assets, or other business transactions, your personal information may be transferred to the acquiring entity. We will notify you of any such transfer and the privacy practices that will apply to your information going forward.

8. SENSITIVE PERSONAL INFORMATION

Certain categories of information we collect are considered sensitive under applicable law, including your Social Security Number, government-issued ID numbers, and biometric data used for identity verification.

Where we use a third-party identity verification provider to confirm your identity through facial recognition or document scanning, that provider processes biometric data on our behalf under a separate agreement that restricts their use of your data. We will seek your explicit consent before any biometric processing takes place, where required by law.

We use sensitive personal information only for the purposes of verifying your identity, complying with legal obligations, and preventing fraud. We do not use sensitive personal information for marketing purposes.

9. HOW DO WE PROTECT YOUR INFORMATION?

Atlantic Xchange applies industry-standard technical and organizational security measures to protect your personal information from unauthorized access, disclosure, alteration, or destruction. Our security measures include:

- Encryption of sensitive data in transit using TLS (Transport Layer Security) and at rest using AES-256 encryption;
- Role-based access controls ensuring that only authorized employees with a specific business need can access your personal information;
- Multi-factor authentication for access to internal systems containing personal data;
- Regular security assessments and vulnerability scanning of our platforms;
- Employee training on data privacy and security practices; and
- Incident response procedures to detect, contain, and report data breaches in accordance with applicable law.

While we take these precautions seriously, no method of data transmission or storage is completely secure. You are responsible for maintaining the confidentiality of your account credentials and for notifying us immediately if you suspect unauthorized access to your account.

10. HOW LONG DO WE RETAIN YOUR INFORMATION?

We retain your personal information for as long as necessary to provide our services and fulfill the purposes described in this Notice, including satisfying our legal, regulatory, accounting, and reporting obligations.

As a federally regulated financial institution, we are required by law to retain certain records for a minimum of five (5) years following the end of your relationship with us, and in some cases longer. Specifically:

- Transaction records and supporting documentation are retained for a minimum of 5 years under the Bank Secrecy Act;
- Identity verification records are retained for the duration of your account plus 5 years after closure;
- SAR and CTR filings are retained for a minimum of 5 years from the date of filing; and
- Customer communications and support records are retained for 3 years after your last interaction with our support team.

When retention periods expire and no legal obligation requires continued storage, we securely delete or anonymize your personal information. You may request deletion of your information at any time, subject to our legal retention obligations described above.

11. YOUR PRIVACY RIGHTS

Depending on the state in which you reside, you may have certain rights over your personal information. Atlantic Xchange respects and honors these rights to the extent required by applicable law.

11.1 Right to Know and Access

You have the right to request a copy of the personal information we hold about you, including the categories of information collected, the sources from which it was obtained, the purposes for which it is used, and the third parties with whom it is shared.

11.2 Right to Correct

You have the right to request correction of inaccurate or incomplete personal information we hold about you. You can update certain account information directly by logging into your account at www.atlanticxchange.com. For other corrections, please contact us at customerservice@atlanticxchange.com.

11.3 Right to Delete

You may request deletion of your personal information. Please note that we may be unable to fulfill deletion requests in full where we are required by law to retain certain records, including transaction records and identity verification documentation as described in Section 10.

11.4 Right to Opt Out of Marketing

You may opt out of receiving marketing communications from us at any time by clicking the unsubscribe link in any promotional email, replying STOP to any marketing SMS, or contacting us at customerservice@atlanticxchange.com. Opting out of marketing does not affect your receipt of transaction-related or legally required communications.

11.5 Right to Limit Use of Sensitive Information

You have the right to request that we limit our use of your sensitive personal information to only what is necessary to provide our services and comply with our legal obligations.

11.6 Right Against Automated Decision-Making

Where an automated process has made a decision that significantly affects your account or a transaction, you have the right to request a manual review of that decision. Please see Section 6 for details on how to submit such a request.

11.7 Right to Non-Discrimination

Atlantic Xchange will not discriminate against you for exercising any of your privacy rights. Exercising your rights will not result in denial of services, different pricing, or reduced quality of service, except where the limitation directly results from our inability to verify your identity or comply with applicable law without the requested information.

12. STATE-SPECIFIC PRIVACY RIGHTS

In addition to the rights described in Section 11, residents of certain states in which Atlantic Xchange is licensed have additional rights under applicable state privacy laws.

Virginia Residents

Under the Virginia Consumer Data Protection Act (VCDPA), Virginia residents have the right to access, correct, delete, and obtain a copy of their personal information, and to opt out of targeted advertising. To submit a request or appeal a denied request, contact us at customerservice@atlanticxchange.com.

Texas Residents

Under the Texas Data Privacy and Security Act (TDPSA), Texas residents have rights to access, correct, delete, and obtain a copy of their personal information, and to opt out of targeted advertising. To submit a request, contact us at customerservice@atlanticxchange.com.

Maryland Residents

Maryland residents have the right to know what personal information we collect and share, to opt out of certain sharing, and to request deletion of their information. If your account has a Maryland

mailing address, we will not share your information with nonaffiliated third parties except as permitted by law.

New Jersey Residents

New Jersey residents have rights to access, correct, and delete their personal information, and to opt out of the sale or sharing of personal information and targeted advertising, in accordance with New Jersey data privacy law.

New York, North Carolina, Illinois, Florida, Georgia, and Michigan Residents

Residents of these states have rights consistent with applicable state privacy and financial services laws, including the right to access and correct personal information and to opt out of marketing. Contact us at customerservice@atlanticxchange.com to exercise these rights.

To exercise any of the rights described in this Section, please submit a request by emailing customerservice@atlanticxchange.com or calling 1-888-444-3962. We will verify your identity before processing your request and will respond within the timeframe required by applicable law. We do not charge a fee for exercising your privacy rights unless a request is excessive or manifestly unfounded.

13. U.S. CONSUMER PRIVACY NOTICE

The following summary applies to all U.S. residents who use Atlantic Xchange services for personal, family, or household purposes, as required under applicable federal financial privacy law.

WHY?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully.

WHAT?

The types of personal information we collect and share include your Social Security Number, account and transaction information, identity verification documents, and payment details.

HOW?

All financial companies need to share customers' personal information to run their everyday business. The table below explains the reasons Atlantic Xchange may share your information and whether you can limit that sharing.

Reason We May Share Your Information	Do We Share?	Can You Limit This?
For everyday business purposes processing your transfers, maintaining	Yes	No

your account, complying with court orders or legal investigations		
For our own marketing purposes to tell you about our services and promotions	Yes	No, we are required to send service-related communications
For joint marketing with other financial companies	No	We do not share
For our affiliates' everyday business purposes information about your transactions and account activity	Limited	Only as required to operate our services or comply with law
For nonaffiliated third parties to market to you	No	We do not share

To limit our sharing or to opt out of marketing communications, contact us at customerservice@atlanticxchange.com or call 1-888-444-3962.

14. CHILDREN

Our services are intended for adults aged 18 and over. Our system is designed to prevent individuals under the age of 18 from creating an account date of birth is collected during registration and any applicant who does not meet the minimum age requirement is automatically blocked from completing the onboarding process.

15. THIRD-PARTY WEBSITES AND LINKS

Our website and mobile app may contain links to third-party websites, tools, or services. This Notice does not apply to those third-party platforms and we are not responsible for their privacy practices. We encourage you to review the privacy policies of any third-party website or service you visit or use before providing any personal information.

Any interactions you have with third-party services including social media platforms, payment networks, or identity verification providers are governed by their own privacy policies and terms of service, not by this Notice.

16. INTERNATIONAL DATA TRANSFERS

Atlantic Xchange is a U.S.-based company and all personal information we collect is stored and processed in the United States. In order to complete international money transfers, we share limited transaction and recipient information with our payout partners in destination countries. This sharing is limited strictly to what is necessary to execute your transfer and comply with applicable financial regulations.

We require all international payout partners to handle recipient and transaction data in accordance with applicable financial services regulations in their respective jurisdictions. We do not transfer

your personal account data outside the United States beyond what is necessary to complete your transfers.

17. CHANGES TO THIS NOTICE

We may update this Privacy Notice from time to time as our services evolve, as applicable law changes, or as our data practices are updated. When we make material changes, we will post the updated Notice on our website and mobile app with a revised "Last Updated" date and, where required by law, notify you directly by email or through your account.

We encourage you to review this Notice periodically. Your continued use of our services after the effective date of any update constitutes your acknowledgment of the revised Notice. If you disagree with any material change, you may close your account by contacting us at customerservice@atlanticxchange.com.

18. LANGUAGE

This Privacy Notice is written in English, which is the controlling language for all purposes. If we provide translations of this Notice in other languages, the English version will prevail in the event of any inconsistency or dispute.

19. CONTACT AND COMPLAINTS

If you have questions, concerns, or complaints about this Privacy Notice or our data practices, please contact us:

Atlantic Xchange LLC - Privacy and Compliance Team

5846 Schaefer Rd, Dearborn, MI 48126

Email: customerservice@atlanticxchange.com

Phone: 1-888-444-3962

Website: www.atlanticxchange.com/privacy