

Privacy Policy

Effective Date: 11th November 2025

Company: DMSX Token LLC

Registered Address: 8 The Green, STE B, 19901 Dover, Delaware, USA

Website: <https://www.domus-x.io>

1. Introduction and Scope

DMSX Token LLC (“**DomusX**,” “**Company**,” “**we**,” “**our**,” or “**us**”) respects your privacy and is committed to protecting personal information entrusted to us.

This Privacy Policy explains how we collect, use, disclose, and safeguard personal information when you interact with **domus-x.io**, participate in the **DMSX Security Token** offering, or engage with us through any other channel.

This Policy applies to:

- visitors of our Website;
- verified investors and subscribers to the DMSX Token;
- representatives of institutional investors, service providers, and partners; and
- any person whose personal data we process in connection with our regulated tokenisation platform.

This Privacy Policy forms part of our **Terms and Conditions** and must be read together with our **AML Policy** and **Cookies Notice** (where applicable).

2. Definitions

For clarity:

“**Personal Information**” means any data that identifies or can reasonably be linked to an individual, including names, identification numbers, addresses, email addresses, IP data, or wallet identifiers.

“**Processing**” means any operation performed on Personal Information, such as collection, recording, storage, use, disclosure, or deletion.

“**Sensitive Personal Information**” includes government IDs, financial-account data, or biometric identifiers used in KYC.

“**Controller**” means DMSX Token LLC, which determines the purposes and means of processing.

“**Processor**” refers to third-party service providers that process data on our behalf (e.g., KYC, cloud, analytics).

“**Applicable Law**” includes the U.S. Bank Secrecy Act, FinCEN rules, SEC regulations, OFAC sanctions, and state privacy statutes such as the California Consumer Privacy Act (as amended by the CPRA), Virginia CDPA, Colorado CPA, Connecticut CTDPA, and Utah UCPA.

“**Reg S Investor**” and “**Reg D Investor**” mean persons participating under those respective SEC exemptions.

3. Categories of Personal Information Collected

We collect and process the following categories of data:

Identity Data — full name, date of birth, nationality, government-issued identification, selfies or biometric verification used for KYC.

Contact Data — home and mailing addresses, phone numbers, and email addresses.

Financial and KYC Data — source of funds, wallet addresses, subscription amounts, accreditation status, and payment details.

Technical Data — IP addresses, device identifiers, operating system, browser type, geolocation, cookies, and activity logs.

Regulatory Data — sanctions-screening results, PEP (Politically Exposed Person) status, and risk scoring results.

Communication Data — correspondence, investor support requests, and interaction records with our representatives.

4. Sources of Personal Information

We obtain Personal Information from:

(a) **Direct interactions** — information you provide when creating an account, submitting KYC documents, or subscribing for tokens.

(b) **Third-party verification partners** — KYC/AML vendors, accreditation verifiers, custodians, and payment processors.

(c) **Automated technologies** — cookies, analytics, smart-contract interactions, and on-chain metadata.

(d) **Regulatory and public sources** — government databases, sanctions lists, and credit bureaus.

(e) **Affiliates and service providers** — data received in the course of compliance, audit, or reporting.

5. Purposes of Processing

We process Personal Information to:

1. verify identity, accreditation, and eligibility under Reg D and Reg S;
2. perform AML/KYC screening and sanctions checks;
3. administer subscriptions, token issuance, and investor communications;
4. comply with our legal obligations to regulators, tax authorities, and law-enforcement agencies;
5. detect and prevent fraud, cyberattacks, and misuse of the Website;
6. maintain internal records, audits, and financial reporting;
7. improve user experience, site functionality, and analytics;
8. send legally required notices, statements, or policy updates.

We do **not** use Personal Information for general marketing without prior consent.

6. Legal Bases for Processing

Depending on the jurisdiction and processing activity, our legal bases include:

- **Legal Obligation:** compliance with AML, securities, tax, and sanctions laws (primary basis).
- **Contractual Necessity:** to perform Subscription Agreements and provide investor services.
- **Legitimate Interests:** maintaining platform security, preventing fraud, and protecting our investors.
- **Consent:** for optional cookies, newsletters, or cross-border data transfers.
- **Public Interest:** detecting and reporting suspicious transactions or illegal activities.

Where required by law, we will obtain explicit consent before processing sensitive information.

7. Use of Cookies and Tracking Technologies

7.1 The Website uses cookies and similar technologies to enable functionality, secure user sessions, and collect aggregate analytics.

7.2 Types of cookies:

- **Essential Cookies:** required for login, form submission, and transaction processing.
- **Analytics Cookies:** help us understand traffic and performance (e.g., Google Analytics).
- **Preference Cookies:** store user settings such as language or region.
- **Marketing Cookies:** used only with explicit consent; not active by default.

7.3 Users may adjust browser settings to block or delete cookies. However, disabling essential cookies may impair Website performance.

7.4 We provide a **cookie banner** and preference center in compliance with CPRA and GDPR standards.

8. Disclosure of Personal Information

8.1 We disclose Personal Information only as necessary for lawful business and compliance purposes:

- (a) to our affiliates and professional advisers bound by confidentiality;
- (b) to third-party processors providing KYC, AML, accreditation, hosting, analytics, or custodial services;
- (c) to banks, payment partners, or blockchain custodians processing investor funds;
- (d) to auditors, legal counsel, and regulators (SEC, FinCEN, OFAC, IRS) when required by law; and
- (e) to law-enforcement or governmental bodies under subpoena, court order, or other legal mandate.

8.2 We do **not** sell, rent, or trade Personal Information. Data sharing is limited to service delivery and compliance functions under written contracts requiring equivalent security standards.

9. International Data Transfers

9.1 As a Delaware-based entity, DMSX Token LLC stores and processes data primarily in the United States. Investors located outside the U.S. acknowledge that their information may be transferred to the U.S. for processing.

9.2 Where required, we rely on lawful transfer mechanisms such as **Standard Contractual Clauses (SCCs)** or other adequacy safeguards approved under GDPR or UK GDPR.

9.3 Because blockchain ledgers are distributed globally, certain transactional data (wallet addresses, hash references) may be publicly viewable and technically impossible to alter or restrict by jurisdiction.

9.4 By interacting with the Website or completing onboarding, you consent to such cross-border transfers and acknowledge associated privacy implications.

10. Retention of Personal Information

10.1 We retain Personal Information only for as long as necessary to fulfil the purposes described herein or as required by law.

10.2 Regulatory retention minimums:

- KYC/AML records – 5 years after relationship termination;
- transaction and investor files – 7 years (SEC/FinCEN rules);
- tax-related documents – 7 years;

- communications – minimum 3 years.

10.3 After expiry, data are securely deleted or anonymised unless preservation is required for litigation, audits, or enforcement inquiries.

11. Protection and Security Measures

11.1 We implement industry-standard safeguards, including:

- encryption of data in transit (TLS 1.3) and at rest (AES-256);
- multi-factor authentication for internal systems;
- segregation of databases from public networks;
- periodic penetration testing and security audits;
- restricted personnel access on a need-to-know basis.

11.2 While we use robust security, no electronic system is infallible. Investors accept inherent risks of internet-based communications and blockchain transparency.

12. Data Subject / Consumer Rights

Depending on residency, you may exercise the following rights:

- (a) **Access** – obtain a copy of your Personal Information.
- (b) **Correction** – request rectification of inaccurate or incomplete data.
- (c) **Deletion** – request erasure where retention is no longer required by law.
- (d) **Portability** – receive certain data in a structured, machine-readable format.
- (e) **Restriction or Objection** – limit processing under legitimate-interest grounds.
- (f) **Opt-out** – decline targeted advertising or the sharing of data for cross-context behavioural purposes (where applicable).
- (g) **Withdraw Consent** – for processing based on consent, such as marketing emails or cookies.

We will not discriminate against any person for exercising these rights.

13. Verification of Requests and Authentication

13.1 To protect investors, we verify all rights-based requests through secure procedures that may include ID checks, wallet confirmation, or signed attestations.

13.2 We respond within 45 days (extendable once for complexity). If we cannot comply for legal reasons, we will explain the basis for refusal.

13.3 Requests relating to AML/KYC or regulatory data may be declined where deletion or restriction would conflict with statutory obligations.

14. Third-Party Links and Integrations

14.1 Our Website may contain links to external sites or embedded tools provided by third parties (e.g., KYC vendors, custodians, analytics).

14.2 We are not responsible for the privacy practices or security standards of those third parties. Users should review their respective privacy policies before engaging with such sites or services.

15. Children's Privacy

15.1 The Website and token offerings are **not intended for persons under 18 years of age**.

15.2 We do not knowingly collect or maintain Personal Information from minors. Any data inadvertently collected will be promptly deleted upon discovery.

16. AML, Sanctions, and Compliance Disclosures

16.1 Certain processing activities occur without consent where mandated by law, including AML screening, sanctions monitoring, and suspicious-activity reporting.

16.2 These obligations override individual privacy requests to delete, restrict, or object to processing.

16.3 Data shared with regulatory bodies under these programs is handled confidentially but may become part of permanent compliance records.

17. Recordkeeping and Audit Trails

17.1 DomusX maintains electronic records of consents, disclosures, and processing actions to demonstrate compliance.

17.2 Audit logs may include timestamps, IP addresses, and signature metadata. Such logs are encrypted and retained per regulatory retention schedules.

17.3 Access to audit data is strictly controlled and monitored.

18. Automated Decision-Making and Profiling

18.1 We may employ automated systems for AML risk scoring, sanctions screening, and fraud detection.

18.2 These systems evaluate transaction patterns and risk indicators but **do not make investment or eligibility decisions without human oversight**.

18.3 Where required by law, investors may request human review of automated determinations.

19. Updates to this Privacy Policy

19.1 We may update this Policy periodically to reflect regulatory, operational, or technological changes.

19.2 Updated versions will be posted on the Website with a revised effective date.

19.3 Material changes will be communicated by email to registered investors. Continued use of the Website after such notice constitutes acceptance of the updated Policy.

20. Contact Information and Data Protection Officer

Questions or concerns about this Policy or our data-handling practices may be directed to:

Privacy Officer – DMSX Token LLC
8 The Green, STE B, 19901 Dover, Delaware, USA
Email: legal@domus-x.io

For EEA or UK investors, DMSX Token LLC will designate a local representative where required.

You may also lodge a complaint with the **Federal Trade Commission (FTC)**, relevant state Attorney General, or your local supervisory authority.