Privacy Policy

Mexmio LLC
Updated: 2025

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1. Introduction

Mexmio LLC (“Company”, “we”, “us”) is committed to protecting your privacy and ensuring the lawful processing of your personal data. This Privacy Policy explains how we collect, use, store, and protect your information when you use our website **https://mexm.io** and our crypto-fiat exchange services.

By using our website, you agree to this Privacy Policy.

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2. Data Controller

Mexmio LLC
Identification Number: 402350790
Registered Address: Tbilisi, Georgia, Chugureti District, Lochini St. N3-5
Email for privacy inquiries: **privacy@mexm.io**

We process data in accordance with:

- GDPR (General Data Protection Regulation);
- Georgian AML/CTF Law;
- FATF recommendations;
- Requirements of the Financial Monitoring Service of Georgia (FMS).

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3. Data We Collect

We collect only the data necessary to provide our services and comply with AML/CTF obligations.

3.1. Identification Data (KYC)

Collected during identity verification:

- Full name
- Date of birth
- Nationality
- Identity document (passport/ID card)
- Document photo + selfie

- Facial recognition / liveness check
- Residential address
- Proof of address (if required)
- Source of funds (if required)

3.2. Technical and Log Data

Collected automatically:

- IP address
- Device type and browser
- Operating system
- Geolocation (approximate, based on IP)
- Login records
- Transaction logs
- Security and access logs (Cloudflare, AWS)

3.3. Transaction Data

- Wallet addresses
- Exchange amounts
- Transaction timestamps
- Monitoring results from AMLBot (risk score, sanctions check)

3.4. Communication Data

- Emails
- Support messages
- Internal compliance records

We **do not** store card numbers, bank passwords, or custodial crypto wallets.

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4. How We Use Your Data

We process personal data for the following purposes:

4.1. Service Provision

- Account creation
- Identity verification

- Processing crypto-fiat transactions
- Ensuring service security

4.2. Legal and Compliance Obligations

Required by AML/CTF legislation:

- customer identification (KYC)
- transaction monitoring
- detection of suspicious activity
- reporting to FMS (if necessary)

4.3. Security & Fraud Prevention

- Protection from unauthorized access
- Fraud detection
- Abuse prevention
- System monitoring

4.4. Business Operations

- Service analytics
- UI/UX optimization
- Customer support

We **never sell**, lease, or commercially transfer your personal data to third parties.

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5. Legal Basis for Processing (GDPR)

We process data under the following lawful bases:

- **Contract performance** – providing exchange services
- **Legal obligation** – AML/KYC duties
- **Legitimate interest** – fraud prevention, service security
- **User consent** – when required (cookies or optional features)

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6. Data Sharing

We share your data only with:

6.1. KYC/AML Provider

Third-party verification provider:

- **AMLBot (Safe3 UAB, Lithuania)**
  Used for identity verification, sanctions checks, PEP screening.

6.2. Cloud & Security Providers

- **AWS Ireland (data hosting)**
- **Cloudflare (security, DDoS protection)**

6.3. Regulators

Only in cases required by law:

- Financial Monitoring Service of Georgia
- National Bank of Georgia
- Law enforcement upon legal order

We **do not** share data with marketing companies or external advertisers.

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7. Data Storage & Security

Your information is stored securely in **AWS Ireland (EU)** using:

- AES-256 encryption for stored data
- TLS 1.3 encrypted channels
- MFA-protected administrative access
- VPN-enforced internal access
- Immutable audit logs (CloudTrail)
- Daily encrypted backups (cross-region)

No data is stored in Georgia or in any non-GDPR jurisdiction.

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8. Data Retention

Under AML/CTF law, we must retain client data for:

Minimum: 5 years

after the termination of the business relationship.

After the retention period expires, data is permanently deleted or anonymized.

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9. User Rights (GDPR)

You have the right to:

- **Access** your personal data
- **Correct** incorrect data
- **Request deletion** (where legally allowed)
- **Restrict processing**
- **Object to processing** in certain cases
- **Withdraw consent** for non-essential data
- **File a complaint** with a data protection authority

Some rights may be limited due to AML/CTF legislation (e.g., deletion cannot be granted within 5-year retention period).

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10. Cookies

We use only essential and security-related cookies:

- session cookies
- Cloudflare security cookies
- basic analytics cookies (no advertising)

A full Cookie Policy can be provided on request.

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11. Children's Privacy

Our service is strictly **18+**.
We do not knowingly collect data from minors.

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12. Changes to This Policy

We may update this Privacy Policy to reflect:

- regulatory changes,
- business process updates,
- security improvements.

The latest version is always available on **mexm.io/legal/privacy-policy**.

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13. Contact Information

For privacy-related requests:
privacy@mexm.io
For AML-related requests:
compliance@mexm.io

Mexmio LLC
Tbilisi, Georgia