

Liberty Privacy Policy

Last Updated: July 19, 2026

This Privacy Policy explains how Liberty ("we," "us," or "our") collects, uses, discloses, and safeguards your personal information when you visit our website at [insert website URL] (the "Site"), access our platform, or interact with us in any other way.

By using the Site, creating an account, or providing personal information to us, you agree to the practices described in this policy.

1. Information We Collect

We collect personal information that you voluntarily provide to us, including:

Personal Identification Information:

- Name, email address, phone number, and residential address
- Government-issued identification (for KYC/AML compliance)
- Date of birth and citizenship information

Wallet & Blockchain Information:

- Cryptocurrency wallet addresses connected to Liberty
- Transaction history and investment activity across supported chains
- Portfolio holdings and basket allocations

Payment Information:

- Payment methods used to deposit or withdraw funds
- Bank account details (for fiat on/off-ramps)
- Transaction records and payment history

Investment Information:

- Investment preferences and basket selections
- Risk tolerance assessments
- Trading activity and order history
- Performance data and returns

Technical Information:

- IP address, browser type, device information, and operating system
- Pages visited, time spent on site, and browsing patterns
- Cookies and similar tracking technologies
- API access logs (if using Liberty API)

KYC/AML Information:

- Proof of identity and address verification
 - Source of funds documentation
 - Beneficial ownership information (if applicable)
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2. How We Use Your Information

We use your personal information for the following purposes:

Account Management:

- Creating and managing your Liberty account
- Verifying your identity and conducting KYC/AML compliance
- Processing deposits, withdrawals, and investment transactions

Investment Services:

- Executing basket strategies and rebalancing positions
- Calculating returns and performance metrics
- Providing investment recommendations and analytics
- Managing orders across integrated blockchain networks

Risk Management & Security:

- Monitoring accounts for fraudulent activity
- Detecting and preventing market manipulation
- Enforcing investment limits and risk parameters
- Protecting against unauthorized access

Customer Service:

- Responding to inquiries and providing technical support
- Resolving account issues and disputes
- Notifying you of important updates or changes

Compliance & Legal:

- Meeting regulatory obligations (KYC, AML, CTF)

- Reporting to relevant financial authorities as required
- Maintaining audit trails for regulatory inspection
- Complying with law enforcement requests

Platform Improvement:

- Analyzing user behavior to improve platform functionality
- Testing new features and basket strategies
- Optimizing performance across blockchain networks
- Researching investment trends

Communications:

- Sending educational content about crypto investing
 - Notifying you of market conditions affecting your baskets
 - Providing updates on new baskets or platform features
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3. Disclosure of Your Information

We do not sell your personal information to third parties. However, we may share your information in these circumstances:

Service Providers:

- Blockchain nodes and validators (for transaction settlement)
- KYC/AML verification providers
- Payment processors and custodians
- Cloud hosting and analytics providers
- These parties are contractually bound to protect your information

Regulatory Authorities:

- Financial regulators and government agencies
- Law enforcement officials (with legal process)
- Tax authorities (as required by applicable law)

Business Transfers:

- In the event of a merger, acquisition, or sale of Liberty, your information may be transferred to the acquiring party

User Consent:

- We will not share information beyond these categories without your explicit consent

4. Blockchain & Non-Custodial Nature

Important: Liberty is a non-custodial platform. This means:

- **You maintain control of your assets.** We do not hold your cryptocurrency; it remains in your connected wallet
- **Your wallet address is publicly visible** on blockchain networks (this is inherent to blockchain technology)
- **Transaction history is immutable** and permanently recorded on-chain
- **We cannot reverse transactions** once they are confirmed on the blockchain
- **You are responsible for wallet security.** We recommend using hardware wallets and secure recovery phrases

We do not have access to your private keys, and we cannot recover your assets if your wallet is compromised.

5. Cookies & Tracking Technologies

We use cookies and similar technologies to:

- Remember your preferences and login status
- Collect analytics on how you interact with the platform
- Enhance security and detect fraudulent activity
- Personalize your investment experience
- Track performance of our marketing efforts

Types of Cookies:

- **Essential Cookies:** Required for platform functionality
- **Performance Cookies:** Measure site usage and performance
- **Functionality Cookies:** Remember your preferences
- **Analytics Cookies:** Understand user behavior
- **Targeting Cookies:** Deliver relevant content

You can control cookies through your browser settings, but disabling them may impair platform functionality.

6. Your Rights & Choices

You have the following rights regarding your personal information:

Access: Request a copy of the personal information we hold about you

Correction: Ask us to correct inaccurate or incomplete information

Deletion: Request deletion of your information, subject to legal retention requirements

Opt-Out: Unsubscribe from marketing communications by clicking the "unsubscribe" link in emails

Data Portability: Request your data in a portable format

Withdrawal of Consent: Withdraw consent for specific uses of your data

To exercise these rights, contact us at **contact@liberty.co**

Note: Some information may need to be retained for regulatory compliance or to maintain accurate investment records.

7. Security of Your Information

We implement industry-standard security measures including:

- End-to-end encryption for sensitive data
- Multi-factor authentication (MFA) for account access
- Regular security audits and penetration testing
- Secure API authentication and rate limiting
- Monitoring for unauthorized access attempts

However, no system is 100% secure. We cannot guarantee absolute protection against all security breaches. We recommend:

- Using strong, unique passwords
- Enabling multi-factor authentication
- Never sharing your seed phrase or private keys
- Keeping your devices and software updated

8. Retention of Your Information

We retain your personal information:

- **Account data:** For the duration of your account and as long as legally required
- **Transaction records:** Minimum 5-7 years (regulatory requirement)
- **KYC/AML information:** As required by applicable regulations
- **Analytics data:** Aggregated and anonymized after 12-24 months

Upon account deletion, we will remove your information except where legally required to retain it.

9. International Data Transfers

Liberty operates globally and may transfer your information across borders. We ensure that:

- Transfers comply with applicable data protection laws
- Recipient countries have adequate data protection standards
- Appropriate safeguards are in place (contractual commitments, adequacy decisions)

By using Liberty, you consent to international data transfers.

10. Cryptocurrency-Specific Considerations

Regulatory Uncertainty: Cryptocurrency regulation is evolving. We may update our practices as regulations change, which could affect:

- How we handle your information
- Your ability to use certain baskets or features
- Reporting and compliance requirements

Blockchain Immutability: Once transactions are recorded on-chain, they cannot be deleted or modified. Your transaction history is permanent and publicly visible.

Tax Obligations: You are responsible for reporting your crypto investment income and gains to relevant tax authorities. Liberty may provide data to assist, but you should consult a tax professional.

11. Changes to This Policy

We may update this Privacy Policy periodically. Significant changes will be communicated via:

- Email notice to your registered address
- Prominent notice on the Site
- Requirement for explicit consent (if legally required)

Continued use of Liberty after updates constitutes acceptance of the revised policy.

12. Contact Us

For questions or concerns about this Privacy Policy or our data practices:

Email: contact@liberty.co

We will respond to requests within 30 days.

By using Liberty, you acknowledge that you have read and understood this Privacy Policy.