

SableAssent Coin Corporation

Privacy Policy

sac1gov.com | ourfrontdeskai.com | sableassent.com
Effective Date: June 2026 | Version 1.0

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This Privacy Policy satisfies GDPR Art. 13/14, CCPA §1798.100, and FATF R.10 customer transparency obligations. It applies to all SableAssent platforms and services including SAC1 governance memberships, remittance services, and FrontDesk AI.

1. Data Controller & Contact Information

SableAssent Coin Corporation (Wyoming LLC) and its subsidiary SableAssent Treasury Reserve SPV LLC are the joint data controllers for all personal data processed through our platforms.

Entity	Details
Company	SableAssent Coin Corporation
Address	Wyoming, United States
Email	privacy@sableassent.net
Phone	1.855.SAC1Token
Websites	sac1gov.com sableassent.com ourfrontdeskai.com
Data Protection Contact	compliance@sableassent.net

2. Personal Data We Collect

2.1 Identity & KYC Data

- Full legal name, date of birth, nationality
- Government-issued photo ID (passport, national ID, driver's license)
- Address proof (utility bill, bank statement)
- Selfie / biometric photo for identity verification
- Tax identification number (where applicable)

2.2 Financial Data

- Bank account details for remittance transactions
- Payment card information (processed by Stripe — we do not store raw card data)
- Transaction history, SAC1 token balances, governance tier
- Source of funds declarations
- Remittance recipient information (name, account, country)

2.3 Blockchain & Wallet Data

- Polygon wallet address (public — stored and visible on-chain)
- SAC1 token holdings and transaction history
- Wallet addresses linked to your account for AML screening purposes

Note: On-chain data (wallet addresses and transaction hashes) is public and immutable. We store associated KYC data off-chain in encrypted databases only.

2.4 Technical & Usage Data

- IP address, browser type, device identifiers
- Login timestamps, session data, page views
- Email address, phone number (for authentication)
- Social login data from Google, Twitter (name, email, profile image)

3. Legal Basis for Processing (GDPR Art. 6)

Processing Activity	Legal Basis	Regulation
KYC / AML identity verification	Legal obligation (Art. 6(1)(c))	FinCEN BSA, FATF R.10, MiCA
Processing SAC1 purchases	Contract performance (Art. 6(1)(b))	Membership Terms
Remittance processing	Contract performance (Art. 6(1)(b))	Remittance agreement
Marketing communications	Consent (Art. 6(1)(a))	GDPR, CAN-SPAM
Fraud & AML monitoring	Legitimate interest (Art. 6(1)(f))	FinCEN, FATF
Regulatory reporting	Legal obligation (Art. 6(1)(c))	FinCEN, SEC, VARA

4. Data Retention Schedule



FATF R.11 requires AML transaction records be retained for a minimum of 5 years. GDPR requires stated retention periods per data category. The schedule below is binding on all SableAssent platforms.

Data Category	Retention Period	Legal Basis
KYC identity documents	5 years after relationship ends	FinCEN BSA, FATF R.11
AML transaction records	5 years minimum	FinCEN 31 CFR 1022.320
SAR / CTR filings	5 years from filing date	31 CFR 1010.430
Financial transaction history	5–10 years	MiCA Art. 75, FinCEN
SAC1 governance membership	Duration of membership + 5 years	Contract, FinCEN
Marketing / consent records	Until consent withdrawn + 3 years	GDPR Art. 7(1)
Technical logs (IP, session)	12 months	GDPR legitimate interest
Payment card data	Not stored (Stripe PCI-DSS)	PCI-DSS

Social login data	Until account deletion	GDPR Art. 17
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5. Third-Party Data Processors & Sharing

We share personal data only with the following categories of third parties, each bound by a Data Processing Agreement (DPA):

Category	Provider Examples	Purpose
Payment Processor	Stripe, PayPal	Payment processing — PCI-DSS certified
KYC / Identity	Persona, Sumsub	Identity verification, liveness checks
Blockchain Analytics	AMLBot, Chainalysis	AML wallet screening, OFAC checks
Cloud Infrastructure	AWS, Google Cloud	Data hosting, key management (KMS)
Blockchain RPC	Alchemy	Polygon transaction broadcasting
Travel Rule	TRISA Envoy	FATF Travel Rule data exchange
Email / Comms	MailerLite	Transaction emails, compliance notices

We do not sell your personal data to third parties. We do not use your data for advertising profiling.

6. International Data Transfers

SableAssent operates in the United States and processes data on behalf of users globally including EU, UK, and African diaspora communities. Where personal data is transferred outside the EEA or UK:

- AWS and Google Cloud transfers to the U.S. are covered by Standard Contractual Clauses (SCCs) executed under GDPR Art. 46
- EU customer data is processed in EU-region data centers where possible
- Transfers to African jurisdictions (Ghana, Nigeria, Liberia) comply with applicable data protection laws including the NDPR (Nigeria), Data Protection Act (Ghana), and equivalent frameworks

7. Your Data Rights

7.1 Under GDPR (EU/UK Users)

- Right to access (Art. 15) — Request a copy of your personal data
- Right to rectification (Art. 16) — Correct inaccurate data
- Right to erasure (Art. 17) — Delete your data (subject to regulatory retention obligations)
- Right to portability (Art. 20) — Receive your data in machine-readable format

- Right to object (Art. 21) — Object to processing based on legitimate interests
- Right to restrict processing (Art. 18) — Limit how we use your data

7.2 Under CCPA (California Users)

- Right to know what personal information is collected and how it is used
- Right to delete personal information (§1798.105)
- Right to opt out of sale of personal information (we do not sell data)

7.3 How to Exercise Your Rights

Submit requests to: privacy@sableassent.net

We will respond within 30 days (GDPR) or 45 days (CCPA). Note: we may be unable to delete data subject to regulatory retention requirements (AML records, FinCEN filings).

8. Security Measures

- AES-256-GCM encryption for all personal data at rest
- TLS 1.3 for all data in transit
- Dual-cloud key management: Google Cloud KMS + AWS KMS (FIPS 140-2 Level 3 HSMs)
- Role-based access control — staff access personal data only on a need-to-know basis
- 2-of-3 multi-signature approval for access to encrypted key material
- Annual penetration testing and smart contract audits
- 72-hour breach notification to data protection authorities per GDPR Art. 33

9. Cookies & Tracking

We use cookies and similar technologies as detailed in our Cookie Policy (Section 10 of this document and the on-site Cookie Consent banner). You may withdraw cookie consent at any time via the cookie settings in your browser or our cookie preferences panel.

10. Complaints & Data Protection Authority

If you believe your data rights have been violated, you have the right to lodge a complaint with your national data protection authority:

- EU: Your national DPA (e.g., CNIL for France, BfDI for Germany, ICO for UK)
- UK: Information Commissioner's Office (ico.org.uk)
- Nigeria: National Information Technology Development Agency (NITDA)
- Ghana: Data Protection Commission (dataprotection.org.gh)

Contact our Data Protection Officer first: compliance@sableassent.net

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