#### Legal & Compliance

## 1. General Information

Jenzy Ltd ("Jenzy") is a financial technology company that provides treasury management and cross-border payment solutions for businesses. Jenzy is **not a bank**, a money transmitter, or a licensed financial institution. All regulated financial services, including fiat on/off-ramping and stablecoin-related transactions, are facilitated through our licensed partners.

Jenzy operates as a technology layer, enabling businesses to access efficient, low-cost, and compliant financial services through its integrations with **Delos Financial Ltd** ("Delos") for fiat banking infrastructure and **Fireblocks** for stablecoin custody and transfers.

## 2. Regulatory & Partner Compliance

#### Fiat Banking & Payment Processing

- All fiat transactions, including currency conversions, cross-border payments, and multi-currency treasury services, are provided through **Delos Financial Ltd**.
- Delos Financial Ltd is a registered Money Services Business (MSB) with FinCEN
  (Registration No. 31000282297513) in the United States and is licensed to
  provide foreign exchange, money transmission, and other financial services
  across multiple states.
- In Canada, Delos is registered with FINTRAC under MSB registration number M23425816 for Foreign Exchange Dealing, Money Transferring, Dealing in Virtual Currencies, and Payment Services.
- In the UK, Delos Financial Ltd is registered under company number 15208885 but does not hold an Electronic Money Institution (EMI) licence. All regulated services are provided through its licensed banking partners.

## Stablecoin & Digital Asset Transfers

- Jenzy facilitates stablecoin transactions via **Fireblocks**, a globally trusted **crypto custody and transfer infrastructure provider**.
- Fireblocks ensures institutional-grade security and compliance with regulatory frameworks for digital asset transactions, including KYC, AML, and transaction monitoring.

- Fireblocks provides insurance coverage of up to \$5 million for stablecoin transactions, offering an additional layer of protection for users.
- Jenzy does not hold, issue, or provide exchange services for stablecoins. All stablecoin transactions occur through **regulated third parties**.

## 3. Data Protection & Compliance

- Jenzy is committed to data privacy and security. We adhere to GDPR (General Data Protection Regulation) standards for users in the UK/EU.
- All customer funds and transaction data are stored and processed securely through our regulated partners.
- We employ industry-standard encryption and cybersecurity measures to ensure the protection of sensitive information.

#### 4. Risk Disclosures

## Foreign Exchange & Liquidity Risks

- Exchange rates for fiat and stablecoin conversions may fluctuate due to market conditions. Jenzy does not guarantee fixed conversion rates.
- Cross-border payments are subject to banking regulations and compliance checks, which may affect processing times.

#### Stablecoin & Crypto-Asset Risks

- Stablecoin transactions are dependent on the liquidity and regulatory status of the issuing entity (e.g., **USDC** by Circle).
- Jenzy is not responsible for delays, freezes, or regulatory actions affecting stablecoin transactions.
- Fireblocks provides insurance coverage of up to \$5 million for stablecoin transactions, reducing counterparty risk for users.

# 5. Limitation of Liability

• Jenzy does not hold customer funds. All transactions are processed by **Delos**Financial Ltd and Fireblocks under their respective regulatory frameworks.

- Jenzy is **not responsible for any losses** incurred due to issues related to **partner** banks, custodians, or stablecoin providers.
- Users acknowledge that financial transactions carry inherent risks and agree to use Jenzy's services at their own discretion.

## 6. AML & KYC Compliance

All Jenzy transactions comply with **global Anti-Money Laundering (AML) and Know Your Customer (KYC) regulations** through our regulated partners. This includes:

- **Identity Verification:** Every business using Jenzy undergoes KYC checks conducted by Delos Financial and Fireblocks.
- Transaction Monitoring: Our partners implement real-time fraud detection and AML screening for all transactions.
- Sanctions Screening: Payments are screened against global sanctions lists (OFAC, EU, UK FCA, and FATF guidelines) to prevent illicit financial activity.

## 7. Risk & Liability Disclosure

Jenzy does not custody or control user funds. **Customer assets are directly held with our regulated banking and custodial partners**, and all transactions are subject to their terms and conditions.

#### **Counterparty Risk Mitigation**

To ensure financial stability and security:

- Delos Financial's MSB status ensures regulatory oversight of all fiat transactions.
- Fireblocks' insured custody model mitigates stablecoin risk, ensuring up to \$5M in coverage per transaction.
- In the event of regulatory changes or disruptions, Jenzy will seamlessly transition to alternative licensed providers to maintain compliance and operational continuity.

By relying on **established**, **licensed financial partners**, Jenzy ensures that all transactions meet the highest compliance standards while delivering **faster**, **more cost-effective cross-border treasury solutions** for businesses.

# 8. Terms of Use & Acceptance

- By accessing or using Jenzy's services, you acknowledge and agree to these terms.
- If you do not agree with any part of this legal notice, please refrain from using our platform.

For further inquiries, please contact eni@jenzy.xyz