



Customer Identification Program Notice

Effective Date: April 13, 2026

This Customer Identification Program Notice ("CIP Notice") explains why Baldivicio collects identity-related information, the types of information we may request, how we may verify that information, and what may happen if we are unable to verify your identity.

This Customer Identification Program Notice should be read together with Baldivicio's Terms of Service, Privacy Policy, Acceptable Use Policy, Deposit Insurance Disclosure, Reserve and Transparency Attestation, and other applicable notices made available through the Baldivicio mobile application.

1. Purpose of Identity Verification

To help protect users, maintain the integrity of the service, and comply with applicable legal and regulatory obligations, Baldivicio may require identity verification before or during your use of the service.

Baldivicio uses identity, fraud, security, and compliance controls designed to support lawful onboarding and ongoing account use. These controls may include automated checks, manual review, and requests for additional information where appropriate.

2. Scope of the Service

Baldivicio is a digital financial services platform made available through its mobile application.

Baldivicio currently supports USDC-only activity on Ethereum Mainnet through a custodial model. Baldivicio holds and manages private keys on behalf of users. Certain fiat-to-digital-asset and digital-asset-to-fiat conversion services connected to the Baldivicio experience may be provided by third-party providers, including Banxa.

As a result, some onboarding, funding, payout, or access-related outcomes may depend in part on third-party provider requirements and processes where applicable.

3. Information We May Request

When you apply for an account or when additional verification is required, Baldivicio may request information reasonably necessary to verify your identity, assess eligibility, support compliance review, and protect the service.

This information may include:

3.1 Personal Identification Information

We may request identifying information such as:

- your full legal name;
- date of birth;
- residential address;
- email address;
- phone number; and
- nationality or similar identifying information where required by law or reasonably necessary for compliance purposes.

3.2 Government-Issued Identification

We may request a valid, unexpired government-issued identification document, such as a passport, together with information derived from that document.

3.3 Compliance-Related Information

Where appropriate, Baldivicio may also request information relevant to compliance or risk review, including:

- source of funds or source of wealth information;
- employment or occupation information;
- expected account activity;
- politically exposed person (PEP) or sanctions-related declarations; and
- any other information reasonably necessary to verify identity, assess risk, or comply with legal obligations.

3.4 Additional Supporting Information

If initial verification is incomplete, inconsistent, or requires further review, Baldivicio may request supplemental materials such as proof of address, additional identification materials, or other supporting documents.

4. How We May Verify Information

Baldivicio may use a combination of automated systems and human review to verify information submitted during onboarding or later account review.

Verification methods may include:

- confirming that submitted information is complete and internally consistent;
- reviewing identification documents for validity and consistency;
- comparing information you provide against compliance, sanctions, fraud, or security controls;
- evaluating account access, device, session, or location-related risk signals; and
- requesting additional documentation or clarification where needed.

Baldivicio may also use service providers or compliance partners to support portions of the verification process, where permitted by law and consistent with our privacy and security practices.

5. Ongoing Review and Monitoring

Identity verification may not be limited to the moment you first apply for an account.

Baldivicio may conduct ongoing or repeat review where reasonably necessary to:

- comply with legal or regulatory obligations;

- respond to changes in account activity or risk profile;
- investigate suspected fraud, security concerns, or suspicious activity;
- address sanctions or watchlist-related developments; or
- maintain the safety and integrity of the service.

You may be required to update, confirm, or re-submit information if your account is flagged for further review or if previously provided information is no longer sufficient.

6. What Happens If We Cannot Verify Your Identity

If Baldivicio cannot form a reasonable basis to verify your identity, assess your eligibility, or complete required compliance review, we may take action as appropriate, including:

- refusing to open an account;
- delaying or limiting account access or functionality;
- placing the account under review;
- requesting additional documentation or information;
- suspending or closing the account; or
- restricting certain transactions or services as permitted by law and our policies.

If funding, payout, or conversion activity involves a third-party provider such as Banxa, resolution timing and available outcomes may also depend in part on that provider's legal, compliance, and operational processes.

7. User Responsibilities

You are responsible for providing accurate, current, and complete information during onboarding and at any time Baldivicio requests updated information.

You must not:

- provide false, misleading, or incomplete information;
- submit forged, altered, or invalid documents;
- attempt to open or use an account on behalf of another person without authorization; or
- take steps to evade Baldivicio's identity, fraud, compliance, or security controls.

Failure to cooperate with reasonable verification requests may result in delayed service, limited functionality, suspension, or account closure.

8. Data Use, Retention, and Protection

Baldivicio may collect, use, store, and retain identity and verification-related information for purposes including account administration, fraud prevention, compliance, legal obligations, dispute resolution, and service security, to the extent permitted by law.

Baldivicio applies security and access controls intended to protect this information, but no system can guarantee absolute security.

For more information about how Baldivicio handles personal data, please refer to the Privacy Policy.

9. No Guarantee of Immediate Approval or Continued Access

Submission of information or documents does not guarantee account approval, account activation, transaction access, or continued availability of the service.

Verification outcomes may depend on internal review, legal requirements, security checks, risk controls, and third-party provider processes where applicable.

10. Updates to This Notice

Baldivicio may update this CIP Notice from time to time to reflect changes in service design, legal obligations, onboarding practices, third-party arrangements, or the broader compliance environment.

If material changes are made, Baldivicio may provide notice through the mobile application, by email, or through other appropriate channels.

11. Final Acknowledgment

By applying for or using Baldivicio, you acknowledge and understand that:

- Baldivicio may require identity verification before or during your use of the service;
- Baldivicio may request personal, documentary, and compliance-related information reasonably necessary to verify identity and assess risk;
- Baldivicio may use automated systems, manual review, and third-party support in the verification process;
- certain funding, payout, or related service outcomes may depend in part on Banxa or other third-party provider processes; and
- Baldivicio may delay, limit, suspend, or refuse access where identity verification or compliance review cannot be satisfactorily completed.

If you do not understand or accept these requirements, you should not use the service until you obtain additional clarification.