

# ABXWALLET.COM

## PRIVACY POLICY

*Version 1 — Last updated: 23 October 2026*

This privacy policy explains how **HAYAT GORDEEV HOLDINGS EUROPE LTD** ("**ABX**", "**we**", "**us**" or "**our**") collects and uses personal data when you visit [www.abxwallet.com](http://www.abxwallet.com) or use ABX Wallet (the "**Service**"). It applies whether you run an account, are a member of a team, pay or receive an invoice through ABX, or simply visit our website.

### Who we are and how to contact us

- **Company:** HAYAT GORDEEV HOLDINGS EUROPE LTD, a company registered in England and Wales with company number 17229457. Registered office: 35 Ballards Lane, London N3 1XW, United Kingdom. We operate ABX Wallet at [www.abxwallet.com](http://www.abxwallet.com).
- **Privacy contact:** [aziz@abacustechnologies.co](mailto:aziz@abacustechnologies.co). Please use this address for any question or request about this policy or your personal data.
- **ICO registration:** we are registered with the Information Commissioner's Office, reference ZC174004.
- **Law:** this policy is governed by the laws of England and Wales, and we follow the UK GDPR and the Data Protection Act 2018.

### The short version

- ABX Wallet is a service for businesses. We never hold your private keys, recovery phrases or funds: every payment is signed in your own wallet.
- We use personal data to run the Service, keep it secure and meet our legal duties, including sanctions screening.
- We do not sell personal data and we do not use it for advertising.
- The invoices our business customers put into ABX belong to them. For the people named in those invoices, we act on our customer's instructions (section 3).
- Wallet addresses and transactions on a public blockchain are visible to anyone and cannot be deleted (section 5).
- You have rights over your personal data, and you can complain to us or to the ICO (section 11).

## 1. WHAT WE COLLECT

The personal data we hold depends on how you use ABX. Words such as "Admin", "Payer" and "Payment Page" have the meanings given in our Terms of Service.

### 1.1 Account details

- Your email address, full name, password (stored only as a one-way hash, never in readable form), sign-up date, last sign-in and account status.
- Which version of our Terms of Service and Data Processing Agreement you accepted, which version of this policy you acknowledged, and when.
- Details of your business: its name, billing settings, account status (including whether the account is on hold following sanctions screening) and, if it closes its account, the closure date.

- Sign-in security data: verified email addresses, two-factor authentication settings and recovery codes, and your sign-in sessions.

## **1.2 Your team**

- Which businesses you belong to and your role (Admin, Manager or Bookkeeper).
- Invitations: the email address and role of the person invited, the invitation link and its expiry, and when the invitation was accepted or withdrawn.

## **1.3 Invoices you upload or enter**

- The details read from each invoice: invoice number, issue and due dates, the issuer's name and address, the bill-to name and address, a short summary, the payment address, network and coin.
- Both amounts where an invoice states them: the total in the invoice's own currency (for example, SGD 5,835.86) and the amount the supplier asks to be paid in a stablecoin (for example, 4,132.55 USDT). We show both and do not convert between them.
- The raw output of the reading service (with confidence scores and page references), the original values, your corrections and sign-offs, and an edit history showing which field changed, from what, to what, by whom and when.
- The file name, size and a digital fingerprint (hash) of each file. The PDF itself is held in Abacus Docs, our document-reading service. If you enter an invoice manually, we keep the PDF ourselves.

## **1.4 Invoices you send**

- Your sender profile: business name, address, email, registration number, payment terms and logo.
- Each invoice you send: its number and dates, your name and your customer's name, addresses and email addresses, line items, notes, total (in US dollars), the wallet and address to be paid, the PDF and the link to its Payment Page.
- Payments made on those invoices: the amount, the wallet addresses, the transaction hash and status and, where the payer is another ABX customer, which business paid.
- "Bill me via ABX" requests: the supplier's email address, the status of the request, its link and the relevant dates.

## **1.5 Wallets and payments**

- Your linked wallet addresses: the network, the address, its label, the wallet app, who added it and when it was verified.
- Your approved suppliers (names and notes) and the wallet addresses approved for them: who approved each address, when, and from which invoice. If you dismiss a look-alike address warning, we record the reason you give.
- Each payment: the amount, coin and network, the sending and receiving addresses, the transaction hash, status and confirmations, any ABX fee details, what our payee check found and whether you confirmed a warning, and when the receipt email was sent.

## **1.6 Compliance records**

- The sanctions lists we download (the UK, UN, EU and US OFAC lists), which contain names, aliases, countries, identifiers and wallet addresses.
- Screening results: who or what was checked, the outcome, and which lists and list versions matched; review cases and the decisions of our reviewers; and screening settings, including the email addresses that receive alerts.

### 1.7 Activity records

- An activity log for each business: what was done, by whom, to what, with a short description.
- When a member of our staff opens a customer record, we log it and show it to the customer as "ABX staff".

### 1.8 Technical data and the address checker

- Your IP address, browser and device information, and our server logs.
- If you use our public address checker, the Tron address you enter. We read that address's public history to give you a result. We do not store the address or the result, but the blockchain data provider we use may keep them in its own logs.

### 1.9 Demo uploads

- If you try the demo on our website without an account, the invoice PDF you upload and what we read from it. Demo uploads are not linked to any account and are deleted after about 60 minutes.

### 1.10 Cashier and promotions (when these features are live)

- **Cashier:** to decide which buy and sell providers to show you, we work out your country from your IP address on each visit. We do not store the country, and we do not keep a record of which provider you choose. Your IP address may appear in our technical logs (section 8).
- **Free TRX promotions:** if we send free TRX to your business's wallet to help pay network fees (called "Promotional Credit" in our Terms), we keep a log of which wallet received how much, and when.

### 1.11 Messages to us

- If you email us or ask for support, your contact details and what you tell us.

### 1.12 People without an ABX account

- **Payers** who open a Payment Page: their email address (as given on the invoice), the wallet address they pay from and the transaction details.
- **Suppliers** who receive a "bill me via ABX" request: their email address.
- **People named in invoices**, such as suppliers, customers and their staff: the details on the invoice. Section 3 explains our role for this information.

### What we do not collect

We never hold private keys, recovery phrases or customer funds. Apart from manually entered invoices, invoice PDFs are not stored in our own database; they are held in Abacus Docs.

## 2. WHY WE USE IT, AND OUR LEGAL BASIS

We may only use personal data where the law gives us a reason (a "legal basis"). The table shows what we use your data for and the legal basis we rely on.

| What we use it for                                                                                                                                                               | Data used                                                                | Legal basis                                                                                                                                                              |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Providing ABX Wallet: creating and running accounts, sign-in and two-factor authentication, teams and roles, reading invoices, preparing payments, sending invoices and receipts | Account, team, invoice, wallet and payment data; security data           | Contract, where you are our customer. Where you use ABX for the business you work for, our legitimate interest in providing the Service that business has signed up for. |
| Billing our customers for their subscription                                                                                                                                     | Business and billing details; account email addresses                    | Contract; legitimate interests                                                                                                                                           |
| Keeping the Service secure, preventing fraud and abuse, and investigating incidents                                                                                              | Technical data, activity records, staff access logs                      | Legitimate interests                                                                                                                                                     |
| Sanctions screening and related reviews (section 6)                                                                                                                              | Names and wallet addresses; screening results                            | Legal obligation (UK sanctions law); legitimate interests (screening against the UN, EU and US lists and frozen-address lists, and protecting ABX and its customers)     |
| Keeping records we must keep, and dealing with authorities                                                                                                                       | Payment and screening records                                            | Legal obligation; legitimate interests                                                                                                                                   |
| The public address checker and the demo                                                                                                                                          | Addresses entered; demo uploads; technical data                          | Legitimate interests (letting visitors try our checks)                                                                                                                   |
| Promotions, including deciding who is eligible, screening the receiving wallet and preventing abuse                                                                              | Wallet address; promotion log; account details                           | Legitimate interests                                                                                                                                                     |
| The Cashier: deciding which providers to show, and passing your wallet address, coin and amount to the provider you choose                                                       | Country worked out from your IP address; wallet address; coin and amount | Legitimate interests; contract, where you are our customer                                                                                                               |
| Answering your messages                                                                                                                                                          | Contact details and messages                                             | Legitimate interests                                                                                                                                                     |
| Establishing, exercising or defending legal claims                                                                                                                               | Any relevant data                                                        | Legitimate interests; legal obligation                                                                                                                                   |

Where we rely on legitimate interests, we have balanced our interests against yours, and you can object (section 11). If we ever need your consent for something, we will ask for it clearly and you can withdraw it at any time.

**We do not sell personal data, and we do not use it for advertising.**

**Emails about free TRX.** If we send your business free TRX under a promotion, we will email you to say so. That email is a service notice about your account, not a marketing message.

## 3. OTHER PEOPLE'S DATA IN YOUR INVOICES

Invoices contain information about people: suppliers and their staff, our customer's own customers and Payers, and their staff. When a business customer uploads, enters or sends invoices through ABX, that business is the **controller** of this information, and we are its **processor**. This means:

- we use the information only to provide the Service to that business, on its instructions, under our Data Processing Agreement with it (the "DPA"), published at [www.abxwallet.com/dpa](http://www.abxwallet.com/dpa);

- the business is responsible for having a lawful reason to use the information and for telling the people concerned; and
- when we email an invoice, receipt or "bill me via ABX" request on a customer's behalf, it comes from our email address and shows the customer's name followed by "via ABX Wallet".

We act as a controller, not a processor, when we screen names and wallet addresses against sanctions lists, and for technical data such as the IP address of a device that opens a Payment Page. If you are named in someone else's invoice, section 11 explains how to contact us.

#### 4. WHO WE SHARE DATA WITH

Each customer's data is kept separate from every other customer's data. We share personal data only with the people and organisations below.

##### 4.1 Service providers that process data for us

| Provider                             | What it does                                                                                                                                          | Where                             |
|--------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|
| Google Cloud Platform (Google)       | Hosting and storage of the Service and all customer data, including for Abacus Docs; AI processing for reading invoices, using Google's Gemini models | United Kingdom or the Netherlands |
| Mailgun (Mailgun Technologies, Inc.) | Sending our emails: invoices, receipts, notifications, verification emails and invitations                                                            | European Union (EU region)        |

Abacus Docs, the service that reads uploaded invoices, is our own document-reading service and is operated by us. It runs on Google Cloud Platform in the United Kingdom or the Netherlands.

Google Cloud Platform and Mailgun act on our instructions. For invoice data, they are the sub-processors listed in the DPA.

##### 4.2 Blockchain data providers

To check payments, read balances, check Tether's list of frozen USDT addresses and look for look-alike addresses, we send wallet addresses and transaction identifiers to public blockchain nodes and data services: **TronGrid** (Tron), **PublicNode** (Ethereum) and the **Solana public RPC**. These are globally distributed services that we do not control. We send them only wallet addresses and transaction identifiers, which are public blockchain data. They act independently of us, and their own privacy terms apply.

##### 4.3 Sanctions screening

We download the UK, UN, EU and US OFAC sanctions lists; we do not send any personal data to the bodies that publish them. When it is switched on, we also send wallet addresses to **Chainalysis**, through its public sanctions service, to check whether an address is sanctioned. Chainalysis is a globally distributed service that we do not control. We send it only wallet addresses, which are public blockchain data. It acts independently of us, and its own privacy terms apply.

##### 4.4 Buy and sell providers (Cashier, when live)

If an Admin uses the Cashier, we send the provider they choose your business's linked Tron wallet address, the coin and any amount entered, in the link to the provider's own page. The provider then collects any other details it needs, such as identity and payment details, directly from you. Each

provider is an independent controller of the data it receives and collects, under its own privacy policy. The providers available in your country are shown in the Cashier.

#### **4.5 Other ABX customers**

If you pay an invoice issued by another ABX customer, or another ABX customer pays yours, a copy of the invoice appears in both accounts as an ABX digital invoice. A Payer who opens a Payment Page sees the invoice they have been sent.

#### **4.6 Google Fonts and wallet apps**

- Our website loads fonts from Google Fonts. Your browser connects to Google directly to do this, so Google receives your IP address.
- Wallet apps such as MetaMask, TronLink, Phantom, Coinbase Wallet and Trust Wallet run in your own browser or phone. They are not our service providers, and their own terms apply.

#### **4.7 Authorities, advisers and a buyer of our business**

- The police, regulators, courts and sanctions authorities, where the law requires or allows us to share data.
- Our professional advisers, insurers and auditors, who must keep it confidential.
- A buyer or successor, if our business is sold or reorganised.

### **5. BLOCKCHAINS ARE PUBLIC AND PERMANENT**

Payments made through ABX are recorded on public blockchains. Today ABX supports the Tron network; support for Ethereum and Solana is built but switched off. Anyone can see the wallet addresses, amounts and times of transactions on these networks, and the records are permanent. Neither we nor anyone else can change or delete them. We do not control any blockchain.

### **6. SANCTIONS SCREENING AND AUTOMATED DECISIONS**

We must not let ABX be used to deal with sanctioned people or addresses. We therefore screen names and wallet addresses against sanctions lists and lists of frozen addresses:

- at sign-up;
- when a wallet or payee is added or changed;
- when a payment is set up, and again when it is signed;
- every day after that; and
- before we send free TRX to a wallet under a promotion.

If a wallet address is on a sanctions list or a frozen-address list, ABX automatically blocks payments to it. Possible matches, such as a similar name, are always reviewed by a person before we decide what to do. As a result of screening we may hold a payment, invoice or registration, decline to send free TRX, or hold, suspend or close an account. We may also report matters to the authorities where the law requires or allows. The law sometimes prevents us from explaining why we have taken a decision.

If a decision based only on automated processing has a significant effect on you, you can ask us for information about it, give us your point of view, ask for a person to review it and challenge it. To

challenge any screening decision, email [aziz@abacustechnologies.co](mailto:aziz@abacustechnologies.co) with the details, and a person will review it.

## 7. INTERNATIONAL TRANSFERS

We are based in the United Kingdom. Our sub-processors process personal data only in these places:

| Provider              | Location                          |
|-----------------------|-----------------------------------|
| Google Cloud Platform | United Kingdom or the Netherlands |
| Mailgun               | European Union (EU region)        |

Transfers from the United Kingdom to the Netherlands and the rest of the European Union are covered by UK adequacy regulations, which recognise the EU's data protection standards. Abacus Docs, our own document-reading service, runs on Google Cloud Platform in the same places.

The blockchain data providers and Chainalysis described in sections 4.2 and 4.3 are globally distributed services that we do not control, and we do not control where they process data. We send them only wallet addresses and transaction identifiers, which are already public on the blockchain.

## 8. HOW LONG WE KEEP DATA

| Data                                                    | How long we keep it                                                                                                                                                                                                                                 |
|---------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Your account, invoices, wallets and other customer data | While the account is open. When the account closes or the Terms of Service end, we delete it or make it inaccessible, including from backups and archives, within 360 days, except records the law requires us to keep or that are described below. |
| Sanctions screening records and payment records         | At least five years.                                                                                                                                                                                                                                |
| Demo uploads                                            | Deleted after about 60 minutes.                                                                                                                                                                                                                     |
| Technical logs                                          | 365 days.                                                                                                                                                                                                                                           |
| Address checker                                         | We do not store the address you enter or the result. They may appear in the data provider's logs.                                                                                                                                                   |
| Free TRX promotion log                                  | 365 days.                                                                                                                                                                                                                                           |
| Cashier country detection                               | We do not store it.                                                                                                                                                                                                                                 |
| Messages to us (support messages and emails)            | 365 days.                                                                                                                                                                                                                                           |
| Blockchain data                                         | Cannot be deleted. It is public and permanent, and we do not control it.                                                                                                                                                                            |

If you delete an invoice, we delete the uploaded file and the copy held in Abacus Docs, unless a sent or paid payment is attached to it or we must keep it. Before closing its account, a business can ask us for an export of its records as a ZIP file. The export does not include our own sanctions screening records, password hashes or other customers' data.

## 9. COOKIES

We use only the cookies the Service needs to work: a sign-in session cookie and a security cookie that protects forms against misuse. Because these cookies are strictly necessary, we do not ask for

consent to use them. We do not use advertising or analytics cookies. Our website loads fonts from Google Fonts, so Google receives your IP address (section 4.6).

## **10. SECURITY**

We protect personal data with measures that include:

- two-factor authentication for every account, and passwords stored only as one-way hashes;
- encryption of customer data at rest;
- encrypted connections (HTTPS, with HSTS) and secure, HttpOnly and SameSite cookies;
- role-based access, and each business's data kept separate so that no customer can reach another's data;
- staff access to customer data only for specific reasons (a support request, a sanctions review, a security or fraud investigation, or a legal duty), limited to what is necessary, logged and shown to the customer as "ABX staff";
- an activity log of sensitive actions such as uploads, edits, payments, exports, team changes and closures;
- rate limits on public tools such as the demo and the address checker;
- never holding private keys: every payment is signed in the customer's own wallet;
- never using customer data to train AI models; and
- an incident response process, handled by Hayat Gordeev Holdings Europe Ltd.

If a personal data breach affects you, we will tell you within 72 hours of discovering it. Where the law requires it, we will also notify the ICO.

No system is completely secure, so please keep your password, two-factor device and recovery codes safe, and tell us at once at [aziz@abacustechnologies.co](mailto:aziz@abacustechnologies.co) if you suspect misuse.

## **11. YOUR RIGHTS**

Under UK data protection law you have the right to:

- ask for a copy of your personal data;
- ask us to correct data that is wrong or incomplete;
- ask us to delete your data;
- ask us to restrict how we use your data;
- object to our use of your data where we rely on legitimate interests;
- ask for your data in a portable format, where the law allows;
- ask for a person to review a decision based only on automated processing (section 6); and
- withdraw consent at any time, where we rely on it.

These rights have limits. For example, we may need to keep some records by law, such as payment and screening records. To use your rights, email [aziz@abacustechnologies.co](mailto:aziz@abacustechnologies.co). We may ask you to prove your identity. We normally reply within one month, and there is usually no charge.

### **If you are named in someone else's invoice**

If you are a supplier, customer or Payer of one of our business customers, or work for one, that business controls the data about you in its invoices (section 3). You can still contact us at

aziz@abacustechnologies.co. We will pass requests about invoice content to the business concerned and help it respond, and we will deal directly with anything we control, such as sanctions screening and technical data.

### **Complaints**

If you are unhappy with how we have used your personal data, please tell us first at aziz@abacustechnologies.co. We will acknowledge your complaint within 30 days and keep you informed until it is resolved. You also have the right to complain to the Information Commissioner's Office (ICO), the UK's data protection regulator: [ico.org.uk](https://ico.org.uk).

### **12. AGE**

ABX is a service for businesses. It is not for anyone under 18, and we do not knowingly collect personal data from anyone under 18.

### **13. CHANGES TO THIS POLICY**

The version number and the date of the last update are shown at the top of this policy, and we keep copies of earlier versions. If we make a material change, we will tell account holders before it takes effect, by email or through the Service. When you sign up, and when we ask you to accept new versions of our Terms of Service and DPA, we ask you to acknowledge that you have read this policy. This policy is a notice: it is not part of our contract with you.