

Privacy Policy

Last updated: June 15, 2026

Account Guidelines

Our Commitment. Your Protection.

01

ACCOUNT MATURITY - ACTIVITY PERIOD

Spinthrift Trust users are required to stay active for **5 months** for account maturity before any withdrawal transactions.

02

MINIMUM BALANCE REQUIREMENT

Spinthrift Trust users are required to have more than **\$50,000** for account maturity with the space of **5 months**.

03

WITHDRAWAL GUIDELINES

Spinthrift Trust users are required to make withdrawal to **non suspicious** address or account number.

04

ACCOUNT STRUCTURE & SAFETY

Spinthrift Trust users are required to structure their account properly to ensure **safety accounts**.

05

STRUCTURING FEE

Spinthrift Trust users are required to pay the **structuring fee** before approval.

These policies are in place to promote a secure, trusted, and transparent experience for all Spinthrift Trust users.

1. Introduction

Spinthrift Trust ("we," "us," or "our") respects your privacy and is committed to protecting the personal information you share with us. This Privacy Policy describes how we collect, use, disclose, and safeguard your information when you use our website and trust management services. By accessing or using our services, you consent to the practices described in this policy.

2. Scope and Applicability

This Privacy Policy applies to all information collected through our website, trust management platform, digital asset services, and any related services, communications, or interactions. This includes information collected during account registration, trust creation and administration, digital asset management, customer support interactions, and marketing communications. Where a separate agreement between you and Spinthrift Trust conflicts with this Privacy Policy, the terms of that separate agreement shall prevail to the extent of the conflict.

3. Information We Collect

We collect the following categories of personal information:

Account Information: When you create an account, we collect your name, email address, password, and other registration details necessary to establish and maintain your account.

Trust Application Data: During the trust creation process, we collect detailed information including the trust type, trust name, purpose, and initial funding amount. We also collect grantor details (name, email, phone number, and physical address), beneficiary information (names, relationships, dates of birth, contact details, and addresses), and guarantor details (name, phone number) where applicable.

Identity Verification: We may collect signature images, photographs, and other forms of identification provided during the onboarding process for trust verification purposes.

Financial Information: We collect information related to your trust funding, digital asset holdings, deposit and withdrawal activity, and transaction history within our platform.

Automatically Collected Information: When you access our services, we automatically collect certain technical information including your IP address, browser type and version, operating system, referring URLs, pages visited, time and date of visits, and other usage data. This information is collected through cookies, log files, and similar tracking technologies.

Communications: We retain records of correspondence when you contact us for support, submit feedback, or communicate with us through any channel.

4. How We Use Your Information

We use the information we collect for the following purposes:

- To create, maintain, and administer your account and trust arrangements
- To process trust applications, including review and approval or rejection
- To generate trust documents and legal declarations
- To manage digital asset portfolios and process transactions including deposits, withdrawals, and swaps
- To verify your identity and prevent fraud, money laundering, and other illegal activities
- To send you notifications regarding your account status, trust status changes, and transaction confirmations
- To respond to your inquiries and provide customer support
- To improve, personalize, and optimize our services and user experience

- To comply with legal obligations, regulatory requirements, and law enforcement requests
- To enforce our Terms of Service and protect our rights, property, and safety
- To send you service updates and, where permitted, promotional communications about our services

5. How We Share Your Information

We do not sell, rent, or trade your personal information to third parties for their marketing purposes. We may share your information in the following limited circumstances:

Service Providers: We may share information with trusted third-party service providers who assist us in operating our platform, processing transactions, or providing services to you. These providers are contractually obligated to use your information only for the purposes we specify and to maintain appropriate security measures.

Legal Requirements: We may disclose your information when required by law, subpoena, court order, or other legal process, or when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

Business Transfers: In the event of a merger, acquisition, reorganization, bankruptcy, or sale of all or a portion of our assets, your information may be transferred as part of that transaction. We will notify you via email or prominent notice on our website of any change in ownership or uses of your personal information.

With Your Consent: We may share your information with third parties when you have given us explicit consent to do so.

Aggregated or De-Identified Data: We may share aggregated or de-identified information that cannot reasonably be used to identify you for research, analytics, or other purposes.

6. Data Security

We implement reasonable and appropriate administrative, technical, and physical safeguards designed to protect your personal information from unauthorized access, use, alteration, and destruction. These measures include encryption of data in transit using TLS/SSL protocols, encryption of sensitive data at rest, secure access controls and authentication mechanisms, regular security assessments and monitoring, and restricted employee access to personal information on a need-to-know basis. While we strive to protect your personal information, no method of transmission over the Internet or method of electronic storage is completely secure. We cannot guarantee the absolute security of your information, and you acknowledge that you provide your information at your own risk.

7. Cookies and Tracking Technologies

We use cookies and similar tracking technologies to enhance your experience on our platform. The types of cookies we use include essential cookies (necessary for the website to function), functional cookies (preference and personalization), and analytics cookies (understanding visitor behavior). You can manage cookie preferences through your browser settings.

8. Data Retention

We retain your personal information for as long as your account remains active or as needed to provide you with our services. We may also retain and use your information as necessary to comply with our legal obligations, resolve disputes, enforce our agreements, and for legitimate business purposes. Trust-related documents and records may be retained for extended periods in accordance with applicable legal and regulatory requirements governing trust administration and financial record-keeping.

9. Your Rights and Choices

Depending on your jurisdiction, you may have rights regarding your personal information, including access, correction, deletion, data portability, opt-out of marketing, and withdrawal of consent. To exercise any of these rights, please contact us. We will respond to your request within a reasonable timeframe and in accordance with applicable law.

10. International Data Transfers

Your personal information may be stored and processed in the United States or any other country in which we or our service providers maintain facilities. By using our services, you consent to the transfer of your information to countries outside your country of residence, which may have different data protection rules than those of your country.

11. Children's Privacy

Our services are not intended for individuals under the age of 18. We do not knowingly collect personal information from children under 18. If we become aware that we have inadvertently collected personal information from a child under 18, we will take steps to delete such information as soon as possible. Please note that beneficiary information for minors is collected from the grantor or legal guardian, not from the minor directly.

12. Third-Party Services and Links

Our website may contain links to third-party websites, applications, or services that are not operated by us. We are not responsible for the privacy practices of these third parties. We encourage you to review the privacy policies of any third-party services before providing them with your personal information.

13. Digital Asset and Blockchain Data

When you use our digital asset management services, please be aware that blockchain transactions are recorded on public distributed ledgers. While we do not publish your personal identity on any blockchain, transaction data such as wallet addresses, transaction amounts, and timestamps are publicly visible and immutable once confirmed on the blockchain. We cannot delete or modify information that has been recorded on a public blockchain.

14. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technologies, legal requirements, or other factors. We will notify you of any material changes by posting the updated policy on this page and updating the "Last updated" date at the top.

15. Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us. We will make every effort to respond to your inquiry in a timely manner.