



# AURION TRUST HOLDINGS

## PRIVACY POLICY

Your Data. Our Responsibility.

Effective Date: April 4, 2026 | Last Updated: April 4, 2026

Filing ID: 2026-001941325 | Global Aurion Holdings LLC, Wyoming, USA

[aurion-trust-holdings.com](http://aurion-trust-holdings.com) | [info@aurion-trust-holdings.com](mailto:info@aurion-trust-holdings.com)

CONFIDENTIAL DOCUMENT

**GDPR**

Compliant

**CCPA**

Compliant

**AES-256**

Encrypted

**0**

Data Sold

**YOUR PRIVACY IS OUR HIGHEST PRIORITY**

At Aurion Trust Holdings, we believe that trust is the foundation of every financial relationship. Your personal data is never sold, rented, or shared for commercial purposes — ever. We use bank-grade encryption, strict access controls, and full regulatory compliance to ensure your information remains safe, private, and secure at all times.

**SECTION 1 — INTRODUCTION**

Global Aurion Holdings LLC, operating under the trading name **Aurion Trust Holdings** ('we', 'us', 'our'), is deeply committed to protecting your privacy and handling your personal data with the utmost care and transparency. This Privacy Policy describes how we collect, use, process, store, share, and protect your personal information when you use our Platform at [aurion-trust-holdings.com](https://aurion-trust-holdings.com) (the 'Platform').

We comply with the General Data Protection Regulation (GDPR), UK GDPR, California Consumer Privacy Act (CCPA), and all other applicable data protection laws. This policy is written in plain English to ensure you fully understand your rights and how we handle your data.

**SECTION 2 — INFORMATION WE COLLECT****2.1 Personal Identification Information**

- Full legal name and date of birth
- Email address and phone number
- Government-issued photo identification (passport, driver's license, or national ID)
- Country of residence and nationality
- Tax identification number (where required by law)
- Live selfie photograph taken during KYC verification process

**2.2 Financial and Transaction Information**

- Cryptocurrency wallet addresses assigned to your account
- Transaction history including deposits, withdrawals, and trades
- Portfolio balances, asset holdings, and performance data
- Price alert configurations and investment preferences
- Deposit and withdrawal reference numbers and method details

**2.3 Technical and Usage Information**

- IP address and approximate geographic location
- Device type, operating system, and browser information
- Platform usage patterns and feature interactions
- Session timestamps, login history, and access logs

- Cookies and similar tracking technologies

## 2.4 Communications

- Records of all communications with our support team
- Feedback, survey responses, and questionnaire answers
- Support ticket history and resolution records
- Email communications including transaction confirmations and security alerts

## SECTION 3 — HOW WE USE YOUR INFORMATION

<b>Account Management</b>	Creating, maintaining, and managing your Platform account, wallet, and portfolio
<b>Identity Verification</b>	Completing KYC and AML verification as required by applicable law
<b>Service Delivery</b>	Providing all Platform features including Markets, Real Estate, Private Market, Trust & Estate, Advisory, and Instant Top Up
<b>Trading Bot</b>	Customizing Trading Bot signals and recommendations based on your portfolio and preferences
<b>Price Alerts</b>	Sending price alert notifications to your registered email address and in-app
<b>Transaction Security</b>	Sending email verification codes for withdrawals and password changes
<b>Security &amp; Fraud</b>	Detecting, preventing, and investigating fraud, unauthorized access, and suspicious activity
<b>Legal Compliance</b>	Complying with applicable laws, regulations, court orders, and regulatory requirements
<b>Customer Support</b>	Responding to inquiries, resolving disputes, and providing technical assistance
<b>Platform Improvement</b>	Analyzing anonymized usage patterns to improve features and user experience
<b>Communications</b>	Sending account notifications, security alerts, transaction receipts, and service updates
<b>Portfolio Reports</b>	Generating and delivering scheduled portfolio performance reports to your registered email

## SECTION 4 — LEGAL BASIS FOR PROCESSING

**Contract Performance:** Processing necessary to provide the Platform services you have requested and agreed to

**Legal Obligation:** Processing required to comply with applicable laws, regulations, and regulatory requirements

**Legitimate Interests:** Processing necessary for fraud prevention, Platform security, and improving our services

**Consent:** Where you have explicitly consented to specific processing activities, such as marketing communications

## SECTION 5 — SHARING YOUR INFORMATION

**We do NOT sell, rent, or trade your personal information to third parties for commercial purposes. Ever.**

We share your information only in the following strictly limited and necessary circumstances:

**Transak:** Our payment partner receives the minimum necessary information to process Instant Top Up cryptocurrency purchases. Transak’s own Privacy Policy governs their use of your data.

**Identity Verification Providers:** Third-party KYC/AML service providers who assist in verifying your identity as required by law. These providers operate under strict confidentiality agreements.

**Law Enforcement & Regulators:** Government authorities and regulators when required by applicable law, valid court order, or regulatory requirement. We notify you where legally permitted.

**Legal Advisors:** Our legal counsel when strictly necessary to protect our legal rights or comply with legal obligations.

**Technology Service Providers:** Trusted infrastructure providers under strict confidentiality and data processing agreements, including: Supabase (database hosting), Resend (transactional email), and Vercel/Cloudflare (platform hosting and CDN).

**Business Transfers:** In the event of a merger, acquisition, or sale of assets, your information may be transferred subject to equivalent or stronger privacy protections.

**SECTION 6 — DATA SECURITY**

**OUR SECURITY INFRASTRUCTURE**

We implement comprehensive, multi-layered security measures designed to protect your personal information against unauthorized access, disclosure, alteration, and destruction. Our security framework meets and exceeds industry standards for financial services platforms.

<b>Encryption at Rest</b>	AES-256 military-grade encryption for all stored data
<b>Encryption in Transit</b>	TLS 1.3 encryption for all data transmitted between your device and our servers
<b>Session Security</b>	Iron Session encrypted session management with secure, HttpOnly cookies
<b>Database Security</b>	Supabase enterprise database with row-level security policies and restricted access
<b>Authentication</b>	Two-factor authentication (2FA) via email verification codes
<b>Access Controls</b>	Strict role-based access controls — only authorized personnel can access client data
<b>Verification Codes</b>	Email-based verification codes required for withdrawals and password changes
<b>Audit Logging</b>	Complete audit trail of all platform actions, admin activities, and data access
<b>Fraud Monitoring</b>	Real-time transaction monitoring and suspicious activity detection
<b>Security Testing</b>	Regular security audits, penetration testing, and vulnerability assessments

While we implement industry-leading security, no system is completely impenetrable. We strongly encourage you to use a strong, unique password and enable two-factor authentication to maximize the protection of your account.

## SECTION 7 — DATA RETENTION

We retain your personal information for as long as necessary to provide our services and comply with legal obligations:

<b>Account Data</b>	Duration of account + 7 years after closure for legal and regulatory compliance
<b>Transaction Records</b>	Minimum 5 years as required by Anti-Money Laundering (AML) regulations
<b>KYC / Identity Docs</b>	Duration required by applicable law — typically 5 to 7 years in most jurisdictions
<b>Technical Logs</b>	Up to 12 months for security monitoring and fraud prevention purposes
<b>Support Communications</b>	Up to 3 years or as required by applicable law
<b>Marketing Data</b>	Until you withdraw consent or request deletion

## SECTION 8 — YOUR PRIVACY RIGHTS

Depending on your jurisdiction, you have the following rights regarding your personal data. We are committed to honoring these rights promptly and transparently:

**Right of Access:** Request a complete copy of all personal data we hold about you, free of charge

**Right to Rectification:** Request immediate correction of any inaccurate or incomplete personal data

**Right to Erasure:** Request deletion of your personal data, subject to our legal retention obligations

**Right to Restriction:** Request that we temporarily or permanently stop processing your personal data

**Right to Data Portability:** Receive your personal data in a structured, machine-readable, portable format

**Right to Object:** Object to processing of your personal data based on legitimate interests

**Right to Withdraw Consent:** Withdraw consent at any time where processing is based on your consent

**Right to Complain:** Lodge a complaint with your local data protection authority at any time

**To exercise any of these rights, contact our Data Protection team at [support@aurion-trust-holdings.com](mailto:support@aurion-trust-holdings.com). We will acknowledge your request within 48 hours and respond fully within 30 days.**

## SECTION 9 — COOKIES AND TRACKING

Our Platform uses cookies and similar tracking technologies to provide a secure, personalized experience:

- Essential cookies — required for basic Platform functionality, login sessions, and security
- Analytics cookies — anonymized data to understand how users interact with our Platform and improve features
- Preference cookies — to remember your settings, language preferences, and display options
- Security cookies — to detect fraudulent activity and protect your account from unauthorized access

You can control cookie settings through your browser at any time. Note that disabling essential cookies will affect your ability to log in and use the Platform.

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## SECTION 10 — INTERNATIONAL DATA TRANSFERS

As a global platform, your personal information may be transferred to and processed in countries other than your country of residence, including the United States where our servers are primarily hosted. When transferring data internationally, we ensure appropriate safeguards are in place, including standard contractual clauses approved by relevant data protection authorities, to ensure your data receives an equivalent level of protection regardless of where it is processed.

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## SECTION 11 — JURISDICTION-SPECIFIC PROVISIONS

### 11.1 European Union / EEA Users (GDPR)

We process your data in full compliance with the General Data Protection Regulation (GDPR). You have the right to lodge a complaint with your national data protection authority (DPA) at any time. Our legal bases for processing are: contract performance, legal obligation, legitimate interests, and consent. We maintain a Data Protection Officer responsible for GDPR compliance.

### 11.2 United Kingdom Users (UK GDPR)

We comply fully with the UK GDPR and Data Protection Act 2018. Cryptocurrency assets are unregulated in the UK and are not covered by the Financial Services Compensation Scheme (FSCS). Our Trading Bot does not provide FCA-regulated financial advice. Cryptocurrency profits may be subject to UK Capital Gains Tax.

### 11.3 California Users (CCPA)

California residents have additional rights under the California Consumer Privacy Act (CCPA), including: the right to know what personal information is collected; the right to delete personal information; and the right to opt out of the sale of personal information. **We do not sell your personal information to any third parties.**

### 11.4 Other Jurisdictions

Users in other jurisdictions may have additional rights under applicable local laws. Please contact our Data Protection team to understand your specific rights based on your location.

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## SECTION 12 — CHILDREN'S PRIVACY

Our Platform is not intended for individuals under the age of 18. We do not knowingly collect personal information from anyone under 18 years of age. If we become aware that we have inadvertently collected personal information from a minor, we will immediately delete such information from our records.

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## SECTION 13 — CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy periodically to reflect changes in our practices, technology, legal requirements, or other factors. We will notify you of material changes by: (a) posting the updated policy on the Platform with a new effective date; (b) sending an email notification to your registered email address; and (c) displaying a prominent notice on the Platform for 30 days following any material update.

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## SECTION 14 — CONTACT OUR DATA PROTECTION TEAM

For all privacy-related inquiries, requests to exercise your rights, or concerns about our data practices, please contact our dedicated Data Protection team. We are committed to responding promptly and transparently.

<b>Data Protection Officer</b>	Aurion Trust Holdings (Global Aurion Holdings LLC)
<b>Postal Address</b>	30 N Gould St Ste R, Sheridan, Wyoming 82801, USA
<b>Company Filing ID</b>	2026-001941325   Wyoming, USA — Active
<b>Privacy Inquiries</b>	support@aurion-trust-holdings.com
<b>Security Concerns</b>	info@aurion-trust-holdings.com
<b>Platform</b>	aurion-trust-holdings.com
<b>Response Commitment</b>	Acknowledgement within 48 hours   Full response within 30 days

**By using the Aurion Trust Holdings Platform, you confirm that you have read, understood, and consent to the collection and use of your personal information as described in this Privacy Policy. Your privacy and trust are our greatest responsibility.**