lightspark payments Europe

RESTRICTIONS AND LIMITATIONS (END USERS)

Last updated: **7 October 2026**

This document outlines the general restrictions and limitations that apply to the "**Services**" or "**Third-Party Services**" provided or made available to "**End Users**" by Lightspark Payments Europe AS, a company registered in the Republic of Estonia, registry code: 16298772, address: Pärnu mnt 110, Kesklinna linnaosa, 11313 Tallinn, Estonia ("**LSP EU**", "**we**", "**us**", or "**our**").

1. ELIGIBLE CUSTOMERS

1.1. Natural Persons

We currently provide Services and make Third-Party Services available to End Users who are natural persons with citizenship or residency in an EEA Contracting State or Switzerland. However, **"Payment Cards**" are only available for EEA residents.

1.2. Legal Entities

We support Services for End Users that are legal entities registered in an EEA Contracting State, incorporated as limited liability companies.

We do not currently onboard trusts or other legal arrangements without legal personality, foundations, associations, non-profit organizations or charities, or holding companies for private individuals. Eligibility of other legal forms is assessed on a case-by-case basis.

Regardless of jurisdiction and legal form, we are unable to provide Services to legal entities operating in, or deriving revenue from, the following business activities: adult entertainment industry; gambling and betting services; fortune-telling and occult services; unregulated financial schemes and multi-level marketing; fraud, Ponzi or pyramid schemes; unlicensed or unregulated financial services; illegal or synthetic drugs, or drugs without valid prescription; arms, ammunition and related components; counterfeit goods and other illegal trade.

The below additional information applies to natural person End Users only.

2. KYC REQUIREMENTS AND THRESHOLDS

An End User account is created for eligible individuals who have completed the KYC.

The primary requirements are as follows:

- For account creation (**Tier 1**), the eligible End User is required to provide the following:
    - **Proof of Identity (POI)**: a document valid for travel within the EEA (for EEA and Swiss citizens – national identity card or passport; for citizens of other jurisdictions – passport).
    - **Selfie**.
    - In the case of third-country citizens residing in the EEA or Switzerland, a **second Proof of Identity (POI2)**: a valid residence permit issued by an EEA Contracting State or

Switzerland. In certain limited cases, we can accept an identity card issued by an EEA Contracting State as POI2.

- In some cases, we may also require a **Proof of Address (POA)** document in Tier 1 to approve KYC.

- Once the value of an End User's inbound transactions reaches EUR 15,000 in Crypto Assets or EUR 25,000 overall (**Tier 2**), the End User is required to provide the following;
  - **Proof of Address (POA)** document (if not provided in Tier 1): either a utility bill (such as for electricity, gas, water, or landline) or an account statement (such as from a payment institution or a bank). Mobile bills are not accepted. The document must be in the End User's name and match the address provided by the End User. The document must not be older than three (3) months.
  - **Source of funds** information and document(s).

Tier 2 thresholds are subject to change without prior notification and may be applied differently in a specific case. The End User has a 30-day period to complete their Tier 2 verification, during which full account functionalities remain accessible.

3. TRANSACTION LIMITS/THRESHOLDS

The following transaction limits/thresholds apply for individual customers.

Tier	Inbound transactions	Outbound transactions
Tier 1	Crypto Asset pay-ins: • less than €15,000 in total All pay-ins: • less than €25,000 in total	All outbound transactions[1]: • €10,000 per month Card payments[2]: • €10,000 per month • €10,000 per day ATM withdrawals[3]: • €3,000 per month • €350 per day
Tier 2	N/A	No limits for outbound transactions, except for the following. Card payments: • €15,000 per month • €10,000 per day ATM withdrawals: • €3,000 per month • €350 per day

Users onboarded under the legacy non-tiered KYC flow have Tier 1 outbound transaction limits by default but may be eligible for Tier 2 limits or can apply for them via support.

[1] Crypto Asset and fiat currency withdrawals, Crypto Asset transfers, and Card transactions are counted towards the overall outbound transaction limit.

[2] Card payments are further subject to the total monthly outbound limit.

[3] ATM withdrawals are further subject to the total monthly outbound limit.

4. RESTRICTED JURISDICTIONS

Currently, we are unable to provide or make Services available to **residents** of the following jurisdictions: Afghanistan, Algeria, American Samoa, Angola, Anguilla, Azerbaijan, Bangladesh, Belarus, Bolivia, Bosnia & Herzegovina, Burkina Faso, Burundi, Cambodia, Cameroon, Cayman Islands, Central African Republic, Chad, China, Comoros, Congo, Côte d'Ivoire (Ivory Coast), Cuba, Democratic People's Republic of Korea (North Korea), Democratic Republic of Congo, Egypt, Equatorial Guinea, Eritrea, Eswatini, Ethiopia, Fiji, Gabon, Guam, Guatemala, Guinea, Guinea-Bissau, Haiti, Honduras, Hong-Kong, Iran, Iraq, Jordan, Kenya, Kyrgyzstan, Laos, Lebanon, Liberia, Libya, Madagascar, Mali, Mexico, Moldova, Monaco, Montenegro, Morocco, Mozambique, Myanmar, Namibia, Nepal, Nicaragua, Niger, Nigeria, Pakistan, Palau, Palestinian Authority, Panama, Paraguay, Russia, Samoa, Saudi Arabia, Serbia, Somalia, South Africa, South Sudan, Sudan and Darfur, Syria, Tajikistan, Tanzania, Trinidad and Tobago, Tunisia, Türkiye, Turkmenistan, Uganda, Ukraine, United Kingdom of Great Britain and Northern Ireland, United States of America, US Virgin Islands, Uzbekistan, Vanuatu, Venezuela, Vietnam, Virgin Islands (UK), Yemen, Zimbabwe.

Access to Services may be restricted in the countries, territories, regions, and jurisdictions provided above.

Due to regulatory reasons, we are currently unable to offer Services to **citizens** of the Russian Federation, regardless of their residency. However, citizens of the Russian Federation who also hold EU/EEA or Swiss citizenship are eligible for our Services.

5. EXCLUDED PAYMENT CARD USE AREA

Using the Payment Card is not possible within the following countries, territories, regions, or jurisdictions: Afghanistan, Algeria, Belarus, Burkina Faso, Cameroon, Cuba, Democratic Republic of Congo, Egypt, Guinea Bissau, Haiti, Iran, Iraq, Jordan, Kyrgyzstan, Lebanon, Libya, Mali, Morocco, Mozambique, Myanmar, Nicaragua, Niger, Nigeria, North Korea, Pakistan, Palestinian Authority, Russia, Saudi Arabia, Somalia, South Sudan, Sudan, Syria, Tajikistan, Tunisia, Turkmenistan, Türkiye, Ukraine*, United Arab Emirates, Uzbekistan, Venezuela, Yemen, Zimbabwe.

* *Card transactions in Ukraine may be available in certain applications. However, they are not possible in areas of Ukraine that are not under government control.*

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