
STRIGA PLATFORM RESTRICTIONS AND LIMITATIONS (END USERS)

Last updated: 16 February 2024

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 Striga Technology OÜ, a company registered in the Republic of Estonia (Member State of the European Union), registry code: 16298772, address: Sepapaja 6, Lasnamäe linnaosa, 11415 Tallinn (“**Striga**”, “**we**”, “**us**”, or “**our**”).

1. ELIGIBLE CUSTOMERS

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.

2. KYC REQUIREMENTS AND THRESHOLDS

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

In the **non-tiered** KYC flow, an eligible End User is, by default, required to provide their Proof of Identity (POI), selfie, and Proof of Address (POA). *Support for the non-tiered KYC flow shall be gradually terminated and is expected to be fully replaced by the tiered KYC flow (see below) by 30 June 2024.*

In the **tiered** KYC flow, the primary requirements are as follows:

- For account creation (**tier 1**), the eligible End User is required to provide their Proof of Identity (POI) and make a selfie. In the case of non-EEA citizens residing in the EEA, a second Proof of Identity will be requested (POI2), which must be a valid residence permit issued by an EEA Contracting State. In some cases, we may also require a Proof of Address document in tier 1 to approve KYC.
- Once the value of an End User’s inbound transactions reaches EUR 15,000 in Virtual Assets or EUR 25,000 overall (**tier 2**), the End User is required to provide their Proof of Address document (if not provided in tier 1). An additional check on source of funds is also performed. These 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.
- End Users who have completed tier 2 and wish to increase their outbound transaction limits (see section 3 below) are required to complete a live video call (**tier 3**).

In both flows (tiered and non-tiered), the primary Proof of Identity (POI) must be a document that is valid for travel within the EEA (for EEA citizens – national identity card or passport; for non-EEA citizens – passport).

In both flows, the Proof of Address (POA) must be 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.

3. TRANSACTION LIMITS/THRESHOLDS

The following transaction limits/thresholds apply.

| Tier | Inbound transactions | Outbound transactions |
|------------|---|--|
| Non-tiered | N/A | All outbound transactions ¹ : <ul style="list-style-type: none"> • €15,000 per month Card payments ² : <ul style="list-style-type: none"> • €15,000 per month • €10,000 per day ATM withdrawals ³ : <ul style="list-style-type: none"> • €3,000 per month • €350 per day |
| Tier 1 | Virtual Asset deposits: <ul style="list-style-type: none"> • less than €15,000 in total All deposits: <ul style="list-style-type: none"> • less than €25,000 in total | All outbound transactions: <ul style="list-style-type: none"> • €7,500 per month Card payments: <ul style="list-style-type: none"> • €7,500 per month • €7,500 per day ATM withdrawals: <ul style="list-style-type: none"> • €3,000 per month • €350 per day |
| Tier 2 | N/A | All outbound transactions: <ul style="list-style-type: none"> • €15,000 per month Card payments: <ul style="list-style-type: none"> • €15,000 per month • €10,000 per day ATM withdrawals: <ul style="list-style-type: none"> • €3,000 per month • €350 per day |
| Tier 3 | N/A | Increased limits (more information upon request) |

The value of any outbound transaction for the purposes of interacting with “dAPPs” may be up to EUR 5,000 per transaction.

4. PROHIBITED JURISDICTIONS

Currently, we are unable to provide or make Services available to citizens or residents of the following jurisdictions: Afghanistan, Albania, Algeria, Armenia, Azerbaijan, Barbados, Belarus, Botswana, Burkina Faso, Burundi, Cambodia, Cameroon, Cayman Islands, Central African Republic, Chad, Cuba, Democratic Republic of Congo, Democratic People’s Republic of Korea (North Korea), Egypt, Equatorial Guinea, Ghana, Guinea, Guinea Bissau, Haiti, Iran, Iraq, Jamaica, Japan, Jordan, Kazakhstan, Kenya, Kyrgyzstan, Lebanon, Libya, Mali, Mauritius, Moldova, Morocco, Mozambique, Myanmar, Nicaragua, Niger, Nigeria, Pakistan, Palestinian Authority, Panama, Philippines, Russia,

¹ Outbound transactions include Virtual Asset and fiat currency withdrawals, Virtual Asset transfers, Card transactions.

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

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

Saudi Arabia, Senegal, Somalia, South Sudan, Sri Lanka, Sudan, Syria, Tajikistan, Tanzania, Trinidad and Tobago, Tunisia, Turkmenistan, Türkiye, Uganda, Ukraine, United Arab Emirates, United States of America, Uzbekistan, Vanuatu, Venezuela, Yemen, Zimbabwe.

The Services are not accessible from the countries, territories, regions, and jurisdictions provided above.

We also do not open accounts for residents of the United Kingdom of Great Britain and Northern Ireland.

5. EXCLUDED PAYMENT CARD USE AREA

Using the Payment Card is not possible within the following countries, territories, regions, or jurisdictions: Afghanistan, Albania, Algeria, Bahamas, Barbados, Belarus, Botswana, Burkina Faso, Burundi, Cambodia, Cayman Islands, Congo, Cuba, Democratic Republic of Congo, Democratic People's Republic of Korea (North Korea), Egypt, Equatorial Guinea, Ghana, Guinea Bissau, Haiti, Iran, Iraq, Jamaica, Jordan, Lebanon, Libya, Mali, Mauritius, Morocco, Mozambique, Myanmar, Nicaragua, Niger, Nigeria, Pakistan, Palestinian Authority, Panama, Russia, Saudi Arabia, Senegal, Somalia, South Sudan, Sudan, Syria, Trinidad and Tobago, Tunisia, Turkmenistan, Türkiye, Uganda, Ukraine, United Arab Emirates, Uzbekistan, Vanuatu, Venezuela, Yemen, Zimbabwe.
