

ANNEX A

Information on the crypto-asset transfer service

This information notice is made available to clients in accordance with the regulatory obligations set out in Regulation (EU) 2023/1114 (“MiCAR”) and the ESMA Guidelines on procedures and policies, including client rights, in the context of crypto-asset transfer services (ESMA35-1872330276-2032), and sets out how Cryptosmart S.p.A. (“Cryptosmart” or the “Company”), with its registered office at Via Bruno Simonucci, 18, 06135 – Perugia (PG), VAT No. and Tax Code 03775010543, registered in the Perugia Register of Companies under number PG-350225, enables clients to use crypto-asset transfer services.

For any enquiries, you can contact us by email at: cryptosmart@pec.it , assistenza@cryptosmart.it , or via our website: www.cryptosmart.it.

Which competent authority supervises Cryptosmart?

The competent national authorities responsible for supervising Cryptosmart are the National Commission for Companies and the Stock Exchange (“CONSOB”) and the Bank of Italy, in accordance with the division of responsibilities.

What is the transfer service?

The transfer service offered by Cryptosmart allows users to carry out crypto-asset transfers via integration with the platform managed by the Company itself. Crypto-asset transfers are managed through the user interface available both on *the website* and via the *mobile* app, ensuring a transparent experience that complies with current legislation on crypto-assets.

How do I access the service?

You can access the transfer service via your profile on the Cryptosmart platform, available both via the *website* (www.cryptosmart.it) and via the *mobile* app. Once logged in, you will be able to view all information regarding transactions and details of transfers made.

The minimum technical requirements for access are: an up-to-date web browser (Chrome, Firefox, Safari, Edge) for accessing the website, or iOS 14.0 or Android 10.0 (or later) for the mobile app.

How do I arrange a transfer and what information do I need to provide?

To arrange a crypto-asset transfer, you will need to log in to the Platform and provide the following essential information: (i) the destination wallet address; (ii) the amount and type of crypto-asset to be transferred. The transfer is authorised via a three-factor authentication system comprising: (a) logging in with your personal username and password; (b) a confirmation code sent by email; and (c) a One-Time Password (OTP) generated via a secure authentication system (e.g. Google Authenticator).

Can I revoke a transfer instruction?

Yes, you can revoke a transfer instruction at any time before it has been broadcast to the blockchain network. On the transaction confirmation screen, before giving your final authorisation, you have the option to cancel the transfer. Once the transfer has been broadcast to the blockchain, it becomes irreversible and cannot be cancelled.

What information is provided to me regarding individual transfer transactions?

Each transfer will be recorded and you will be able to view the details in a dedicated section, including the amounts transferred, the crypto-assets involved, the recipients and the status of the transaction. In the event of any issues or regulatory changes, you will be promptly updated via a written notification sent to *the email address* specified in your profile.

What fees apply to the service?

The fees for executing a transfer are determined based on the crypto-asset involved and may vary depending on network congestion or the time at which the order is executed. Detailed information regarding fees is set out in the relevant information notice provided on the Cryptosmart platform.

In any case, before proceeding with the transfer, you will be asked to accept the applicable fees on a case-by-case basis.

What are the deadlines for receiving transfer instructions?

Transfer instructions received after 17:00 (Central European Time – CET) on a working day will be treated as having been received on the following working day for the purposes of execution.

Which blockchains are supported for transfers?

For each crypto-asset, Cryptosmart supports the following blockchain networks: Bitcoin (Bitcoin blockchain), Ethereum (Ethereum blockchain), Cardano (Cardano blockchain), Litecoin (Litecoin blockchain), Polkadot (Polkadot blockchain), Dogecoin (Dogecoin blockchain), BNB (BNB Chain blockchain), Solana (Solana blockchain), as well as ERC-20 tokens on the Ethereum blockchain (e.g. USDC, LINK, POL, etc.) and tokens on the BNB Chain blockchain (e.g. MAMI) and on the TRON blockchain (e.g. TRX).

What are the processing times for the service?

The transfer will be transmitted to the *blockchain* network within a maximum of twenty-four (24) hours of the order being approved, in accordance with Cryptosmart's internal procedures, including those relating to anti-money laundering.

When does a transfer become irreversible?

The time or number of block confirmations required for a transfer to be considered irreversible varies depending on the *blockchain* network used. As a guide: Bitcoin (3 confirmations, approximately 30 minutes); Ethereum and ERC-20 tokens (30 confirmations, approximately 10 minutes); Cardano (15 confirmations, approximately 10 minutes); Litecoin (12 confirmations, approximately 30 minutes); Polkadot (25 confirmations, approximately 2 minutes); Dogecoin (40 confirmations, approximately 40 minutes); Solana (20 confirmations, approximately 1 minute); BNB Chain (30 confirmations, approximately 10 minutes).

In what circumstances may Cryptosmart refuse to provide the service or carry out the transaction?

Cryptosmart may refuse to execute a transfer instruction in the following cases:

- the instruction is incomplete or lacks essential information (for example, an invalid *wallet* address);
- insufficient balance in your *wallet*;
- security reasons, including the suspicion that the instruction did not originate from you;
- force majeure events or system maintenance that temporarily prevent execution;
- the existence of obligations arising from applicable legislation.

With regard solely to crypto-assets qualifying as electronic money *tokens* (i.e., UDSC) under MiCAR, Cryptosmart does not permit the execution of transfers to or from other *wallets* (non-custodial and *self-*

custodial) wallets, given that such services constitute a payment service within the meaning of the PSD2 implementing legislation – and, therefore, may only be provided by the Company following the conclusion of a partnership agreement with a payment service provider authorised under the aforementioned legislation.

For other crypto-assets (so-called ‘tokens other than’), Cryptosmart allows transfers to third parties outside the Platform, in compliance with the verification procedures and obligations arising from the applicable legislation.

Can transfer orders be reversed?

Once the transfer has been executed on *the blockchain*, it becomes irreversible. The transaction details, such as the *timestamp* and unique identifier, are recorded and cannot be altered.

What do I receive following the transfer?

Upon completion of the transfer, you will be provided with a confirmation containing the following information:

- the identity of the payer and the payee;
- the address used for the transfer;
- the unique transaction identifier (*hash*);
- details of the amount transferred and the fees charged.

How often will I receive information about transfers?

Information on completed transfers is available at any time in the ‘transactions’ section of the Platform. If this information is provided no more than once a month, it is free of charge. Any additional requests for reporting outside the standard frequency may incur charges.

In which language are communications drafted?

The contractual agreement and communications throughout the relationship are in Italian.

How will I be notified in the event of fraud or security threats?

In the event of suspected or actual fraud, or security threats relating to the transfer service, Cryptosmart will notify you promptly by email to the address specified in your profile. This notification will also include an estimate of the geographical location of the access based on the IP address.

How can I report an unauthorised or incorrectly executed transfer?

If you believe that an unauthorised or incorrectly executed transfer has taken place, you must notify Cryptosmart no later than 30 days from the date of the transaction by sending a report to the *email* addressassistenza@cryptosmart.it. The report must include: your personal details, a description of the disputed transaction, the date and amount of the transaction, and the reasons for the dispute.

What is Cryptosmart’s liability for unauthorised or incorrect transfers?

Cryptosmart is liable to you for any damage or loss caused by unauthorised or incorrectly executed transfers attributable to the Company’s own shortcomings or negligence. Liability for unauthorised or erroneous transfers attributable to Cryptosmart may extend to the full amount of the unauthorised/erroneous transaction and the fees charged on it.

Cryptosmart is not liable for events beyond its control, such as errors made solely by the customer when entering the wallet address, malfunctions inherent in *blockchain* technology, *hard forks*, attacks on the network or network congestion.

Will I be provided with a summary of the transfer transactions carried out?

Once you have created your profile on the Cryptosmart platform, you will be able to access your transaction history – via both the *website* and the *mobile* app – and download statements in electronic format.

Do I need to consent to the terms set out in this policy?

Before proceeding with the transfer service, you must read this policy and confirm that you have received and understood it.

Can I withdraw from the transfer service agreement?

Yes, you have the right to terminate the agreement for the crypto-asset transfer service at any time. You may exercise this right by sending written notice to the email addressassistenza@cryptosmart.it . There is no charge for termination. Upon receipt of your notice of termination, Cryptosmart will close the service and deactivate your access within a reasonable period of time.

Can I view the contract at any time?

Yes, at any time during the contractual relationship, you may view or, upon request, receive the agreement and this policy in electronic format by accessing your personal account on the Platform or by requesting it via email atassistenza@cryptosmart.it .

Any changes to this privacy notice will be communicated to you promptly at the *email* address provided when you created your profile, with adequate notice before they come into effect. In the event of significant changes, you will be invited to consult the updated privacy notice.