

PRIVACY POLICY

TowerPoint Group, Ltd. | bearerCORE(tm) Platform

Version 1.0 | Effective: August 2026

1. WHO WE ARE

TowerPoint Group, Ltd. is a Delaware corporation (File No. 10619627, EIN 42-2533433) operating the bearerCORE(tm) sovereign CBDC infrastructure platform. Registered address: 131 Continental Dr, Suite 305, Newark, DE 19713, USA. Data Protection Officer: Adwoa K Faakye-McKeever (adwoa.mckeever@bearercore.com).

2. DATA WE COLLECT AND WHY

Category	Data Collected	Purpose	Legal Basis
Platform operators	Name, email, passport/ID, role	Identity verification, access control, AML/CFT CDD	Legal obligation; legitimate interest
Registry data	Serial numbers, timestamps, corridor/state metadata	Double-spend prevention, audit trail, forensic reporting	Legitimate interest; legal obligation
Contact / enquiry	Name, email, message content	Responding to enquiries	Legitimate interest
Website analytics	IP address, browser type, page visits (anonymized)	Platform performance monitoring	Legitimate interest

3. DATA WE DO NOT COLLECT

bearerCORE(tm)'s bearer instrument model minimizes personal data collection. The platform does not require end users to create accounts or disclose identity to hold or transfer CVIB instruments. TowerPoint does not sell, rent, or share personal data with third parties for marketing purposes.

4. DATA STORAGE AND SECURITY

- All registry and operator data stored on DigitalOcean (NYC3, New York City, United States).
- Data at rest protected by AES-256-GCM encryption.
- Access gated by role-based access control (RBAC).
- Periodic security reviews conducted.

5. DATA RETENTION

- Operator identity and CDD records: minimum 5 years after end of relationship.
- Registry/transaction records: minimum 7 years.
- Contact/enquiry records: 2 years or until resolved.
- Data securely deleted or anonymized at end of retention period.

6. YOUR RIGHTS

Depending on your jurisdiction, you may have rights to access, correct, delete, or restrict processing of your personal data, and to object to processing or request data portability. Contact: adwoa.mckeever@bearercore.com. We respond within 30 days. Some rights may be limited by AML/CFT

record-keeping obligations.

7. APPLICABLE LAW

- Nigeria Data Protection Act (NDPA) 2023 — Nigeria-resident data subjects.
- Ghana Data Protection Act, 2012 (Act 843) — Ghana-based operations.
- US state privacy law (Delaware) — TowerPoint's registered jurisdiction.
- FATF and CBN data requirements — AML/CFT record-keeping obligations.

8. CROSS-BORDER DATA TRANSFERS

Data may be transferred between Nigeria, Ghana, and the United States in the course of platform operations. TowerPoint implements appropriate safeguards for cross-border transfers. This is flagged as an open item for legal review during the CBN sandbox period.

9. CONTACT AND COMPLAINTS

DPO: Adwoa K Faakye-McKeever | adwoa.mckeever@bearercore.com | bearercore.com. If not satisfied, you may lodge a complaint with the Nigeria Data Protection Commission (NDPC) or the Ghana Data Protection Commission, as applicable.

10. POLICY REVIEW

Reviewed annually and updated as required. Material changes communicated to affected data subjects.

Adopted by:	TowerPoint Group, Ltd. Board of Directors
Effective Date:	August 13, 2026
DPO:	Adwoa K Faakye-McKeever adwoa.mckeever@bearercore.com