coinmotion

TRANSFER SERVICE NOTIFICATION

Coinmotion provides a crypto-asset transfer service to its clients in accordance with each relevant terms of service. Currently the transfer service is provided in our Standard crypto-asset service and in our (Manual) Staking service (must be agreed separately), which both utilize the procedures described in this notification.

FOR THE AVOIDANCE OF DOUBT, AND AS EXPRESSLY STATED IN THE TERMS OF SERVICE, YOU REMAIN SOLELY RESPONSIBLE FOR ALL ACTIONS TAKEN THROUGH YOUR ACCOUNT, INCLUDING ANY TRANSFER ORDERS PLACED VIA THE SERVICE. THIS RESPONSIBILITY INCLUDES, BUT IS NOT LIMITED TO, ENSURING THAT THE INFORMATION PROVIDED FOR THE RECIPIENT OF A TRANSFER IS ACCURATE AND IN THE CORRECT FORMAT, AND THAT THE RECIPIENT IS IN FACT THE PERSON OR ENTITY TO WHOM YOU INTEND TO MAKE THE TRANSFER (E.G., NOT A FRAUDULENT OR SCAMMING PARTY).

With this notification, Coinmotion provides the clients with the following information relating to its transfer service:

Topic	Explanation
1. Description of the following: (i) how a client can initiate and withdraw a transfer of crypto-assets, (ii) the information the client must provide to initiate the transfer service, and (iii) how a client is identified before the transfer service can be initiated	Coinmotion safeguards the client's crypto-assets held in the custody service by restricting the transfer service, including requiring separate confirmation for each order. This confirmation is provided via a confirmation code sent by email or text message, or retrieved from a separate authenticator application. The client can configure their user account settings to select their preferred confirmation code method: email, text message, authenticator application, or a combination of the authenticator application with either email or text message. In accordance with the Terms of Service, the client is responsible for ensuring that only they have access to the confirmation codes delivered via email or other technical means.
2. The conditions under which an instruction to carry out a transfer of crypto-assets can be rejected	Coinmotion may impose time restrictions on the execution of transfer orders if the client has recently logged in from a new IP address or mobile device. Additionally, Coinmotion conducts both automated and manual reviews of transfer orders before execution to ensure their legality (see the Terms of Service, specifically Section 4.3 of the B-terms) and to prevent cybercrime, such as various types of fraud, to the best of its

	ability. Reviews are typically conducted in one to two days, but may take longer, especially if further information is needed from the client.
3. Description of the moment a command to use the transfer service is considered received, including applicable cut-off times	The transfer is considered received once the transfer is initiated as described in section 1.
4. Description of the maximum duration for executing the transfer service.	BTC and LTC transfers: - A transfer that is valid for execution is included in the next transfer batch (technically a sendmany), which include all transfers valid for execution since the previous transfer batch was executed. The transfer batches are currently run at intervals of 10 minutes on average. This means addition of at most the configured batching period to the execution time under normal conditions. The batching interval can be operationally adjusted to better suit different blockchain fee environments; usually when network transfer fees are high, the batch interval may be increased to save on transfer costs through increased batching, with the expense of longer maximum execution times; conversely during low fee environments the batching interval may be decreased to gain the benefit of shorter maximum execution times with trivial cost impact. - Each transfer batch transaction is broadcast to Bitcoin/Litecoin mempool with a transfer fee that is estimated to trigger the very likely inclusion of the transaction in the next mined block and also be economical under the current network fee conditions. The fee estimate is calculated at the sendmany transaction creation time based on the current mempool transaction data. In almost all cases the transfer batch transaction is mined within the next block or the immediately following block, but rarely (e.g. when blockchain fees have rapidly increased just when the transaction was being broadcast) it can take longer for the transaction to get the first blockchain confirmation. Transfers of other Crypto-assets: - Under normal operating conditions, transfers valid for execution are broadcast usually within one minute with no batching after they become valid for execution.

	- Similarly to BTC/LTC transfers, current blockchain information is used to estimate transfer fees most likely to trigger the initial transfer confirmation in the next block or validation round while also being economical under current network conditions. The maximum execution time from a transfer becoming valid for execution is the sum of the batching time (if applicable), time to broadcast and the blockchain confirmation time. However a transfer considered by Coinmotion as final may not be considered as such by the recipient, if their required confirmation counts are different. For the different Crypto-assets the maximum execution time for a transfer valid for execution can be estimated to be: - BTC: Up to 10 minutes initial batching period and on average 30 minutes for 3 blockchain confirmations: Total maximum 40 minutes, assuming the current configuration for batching is 10 minutes. - LTC: Up to 10 minutes initial batching period and on average 12.5 minutes for 5 blockchain confirmations: total maximum 22.5 minutes, assuming the current configuration for batching is 10 minutes. - ETH & ERC-20 tokens: Up to 1 minute for the next transfer process run and on average 180 seconds for 12 confirmations. - XRP and XLM: Up to 1 minute for the next transfer process run and on average 60 seconds for 12 confirmations. - ADA: Up to 1 minute for the next transfer process run and on average 12 minutes for 12 confirmations. In all of the used networks it's assumed above that new blocks are generated with the average block time for each crypto-asset (e.g. 10 minutes for Bitcoin), but in practice this may vary considerably which is completely outside Coinmotion's influence. Transfers between Coinmotion customers are executed immediately in the internal ledger. The same applies to transfers related to the Company's staking service(s). Incoming transfers are observed by the transfers background process usually within a minute of becoming visible in a mempool or receiving the initial confirmation, and are considered final when they have the number of confirmations defined above.

	However, the execution time of incoming transfers is outside Coinmotion's influence.
5. Methods used for communication, including the technical requirements for the client's equipment and software	You can contact us via email, sending a message within the platform or by phone. Please see more information from here.
6. Information on how and how frequently clients are informed about their use of crypto-asset transfer services.	Coinmotion provides the clients, at the request of the client concerned, with a statement of position of the crypto-assets recorded in the name of those clients. The statement of position is generated from the Coinmotion platform Reporting section based on the current information. Transaction statement consists of a full transaction history of the client, including transfers. Also the transaction statement includes exchange rate information and fees paid. Clients can download statements whenever from the app, and it is generated for any date the client selects and shows the closing balance of that day.
7. Description of the secure procedures through which the client is notified of suspected or actual fraud or cybersecurity threats.	Coinmotion notifies the customer of suspected or actual fraud, or any cybersecurity threats, primarily through our platform messaging system. This approach ensures that sensitive information is communicated safely and directly. When we identify potential fraud related to a customer's account—especially if we consider that no further transfers should be processed to a specific receiver—we immediately alert the customer to reassess the situation. While we cannot monitor all possible scenarios, we make every effort to contact the customer whenever we notice anything suspicious in their accounts. By providing information through our secure channel, we empower our clients to make informed decisions, underscoring our commitment to the security and integrity of their accounts.
8. Description of the methods and time frame within which the client must notify Coinmotion of unauthorized or incorrectly initiated or executed crypto-asset transfers, as well as Coinmotion's liability for such	The client must immediately notify Coinmotion of the unauthorized or incorrectly initiated or executed crypto-asset transfers using the platform messaging service, or via email to the following email address: info@coinmotion.com. Please see more information of liabilities from the relevant terms of service.

unauthorized or incorrectly initiated or executed transfers, including the maximum compensation.	