

NepaliPay Data Retention and Disposal Policy

Version: 1.0

Effective Date: February 2026

Review Frequency: Annual (or upon material changes)

• 1. Purpose

This policy defines how NepaliPay retains and securely disposes of consumer data in compliance with applicable financial and privacy regulations.

• 2. Data Categories

NepaliPay may process:

- Account registration data
- Wallet and transaction records
- Identity verification (KYC) data and verification results
- Data received from bank-linking providers (e.g., Plaid), subject to user authorization
- Stablecoin/blockchain transaction metadata (where applicable)

• 3. Retention Principles

NepaliPay retains data:

- For the duration of an active account, as necessary to provide Services
- As required for legal, regulatory, and compliance obligations (e.g., AML)
- As necessary for fraud prevention, dispute resolution, and auditing

NepaliPay minimizes retention of sensitive data where feasible.

• 4. Consumer Data Deletion

Users may request account deletion.

Upon verified request:

- Account access is terminated
- Non-required personal data is deleted or anonymized where feasible
- Required financial/compliance records are retained only as required by law

• 5. Regulatory Retention

Financial and compliance-related records may be retained in accordance with applicable obligations, which may include:

- Anti-money laundering (AML) and counter-terrorism financing requirements
- Financial reporting obligations
- Fraud prevention and chargeback/dispute requirements

• 6. Secure Disposal

When retention periods expire:

- Data is securely deleted from production systems where feasible
- Cloud provider secure deletion mechanisms are used where supported
- Backups follow provider retention cycles and deletion processes

• 7. Policy Review

This policy is reviewed annually.