

Conflict of Interests Disclosure

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1. INTRODUCTION

Datalink sp. z o.o. ("Trustyfi", "we", "us", or "our"), operating the platform at trustyfi.eu, is committed to maintaining the highest standards of integrity, transparency, and ethical conduct in all our operations as a Virtual Assets Service Provider.

This Conflicts of Interest Disclosure is designed to inform our clients and stakeholders about how we identify, manage, and disclose conflicts of interest that may arise in the course of providing our Services. Transparent management of conflicts is essential to maintaining trust with our clients, regulators, and the broader community.

2. WHAT IS A CONFLICT OF INTEREST

A conflict of interest occurs when our interests, or those of our employees, management, or related parties, may interfere or appear to interfere with our ability to act in the best interests of our clients. Conflicts can arise in various situations and may be:

- **Actual Conflicts:** Where our interests are directly opposed to those of our clients
- **Potential Conflicts:** Where circumstances may create an appearance of conflict, even if they do not actually influence our decision-making

3. POTENTIAL CONFLICTS IN VIRTUAL ASSETS SERVICES

The following situations may give rise to conflicts of interest in our business:

3.1 Personal Financial Interests

Employees or management holding personal investments in specific virtual assets may influence recommendations or prioritization of certain assets. We manage this through disclosure requirements and trading restrictions.

3.2 Gifts, Incentives, and Hospitality

Acceptance of gifts, entertainment, travel, or other incentives from clients, vendors, partners, or service providers could compromise impartiality in business decisions. We maintain strict policies limiting acceptance of such benefits.

3.3 Outside Business Interests

Employees serving in advisory roles, board positions, or maintaining employment with other virtual asset projects, service providers, or competing businesses may face conflicting loyalties or inadvertently share proprietary information.

3.4 Family and Personal Relationships

Hiring, supervising, or conducting business with family members or close personal relationships may lead to preferential treatment or biased decision-making regarding employment, promotions, or business arrangements.

3.5 Referral Arrangements

Receiving referral fees, commissions, or other compensation from third parties for directing clients to specific services or products could create incentives to prioritize those interests over clients' best interests.

3.6 Market Activities

Employees engaging in personal trading, providing market liquidity, or participating in market activities while holding decision-making positions within Trustyfi may create conflicts or opportunities for market manipulation.

3.7 Use of Non-Public Information

Employees accessing non-public information about virtual assets, market conditions, or client activities could potentially use such information for personal trading or benefit, breaching ethical standards and regulatory requirements.

3.8 Participation in Token Offerings

Employees involved in Initial Coin Offerings (ICOs), token generation events, or similar projects while employed by Trustyfi may face conflicts regarding promotion of their projects versus our clients' interests.

3.9 Vendor and Service Provider Relationships

Undisclosed personal or financial relationships with vendors, service providers, technology partners, or other business counterparties may influence procurement or partnership decisions.

3.10 Performance Incentives

Compensation structures based on short-term performance metrics or transaction volumes could incentivize employees to prioritize activities generating immediate revenue over clients' long-term interests.

4. HOW WE MANAGE CONFLICTS OF INTEREST

Trustyfi has implemented comprehensive procedures to identify, manage, and mitigate conflicts of interest:

4.1 Identification and Reporting

All employees and stakeholders are required to identify and promptly report potential or actual conflicts of interest to our Compliance Officer. We maintain a Conflict of Interest Register documenting all identified conflicts and actions taken.

4.2 Assessment and Resolution

Upon identification of a conflict, our Compliance Officer assesses its significance and implements appropriate resolution measures, which may include:

- Recusal from decision-making processes or discussions
- Disclosure to affected clients or parties
- Implementation of information barriers or Chinese walls
- Restriction or prohibition of personal trading activities
- Termination of conflicting relationships or arrangements
- Enhanced monitoring and supervision

4.3 Disclosure Requirements

Employees must submit annual disclosure forms and immediately report any changes in circumstances that may create new conflicts. Disclosures include personal investments, outside business interests, family relationships, and any other relevant matters.

4.4 Trading Restrictions

Employees are subject to restrictions on personal trading in virtual assets, including pre-approval requirements, blackout periods, and prohibitions on short-term trading or use of non-public information.

4.5 Organizational Structure

Where appropriate, we maintain organizational and informational separation between different business functions to prevent conflicts and protect confidential information.

5. DISCLOSURE TO CLIENTS

Trustyfi is committed to transparency with clients regarding conflicts of interest:

- When a material conflict of interest is identified that cannot be effectively mitigated, we will disclose the nature of the conflict to affected clients
- Disclosures will explain how the conflict may impact client interests and what measures have been implemented to address it
- In certain circumstances, we may seek explicit client consent before proceeding with activities subject to conflicts
- Where conflicts cannot be adequately resolved, we may decline to provide services or execute transactions

6. TRAINING AND AWARENESS

We conduct regular training for all employees on:

- Identifying situations that may constitute conflicts of interest
- Understanding reporting obligations and procedures
- The importance of ethical conduct and maintaining client trust
- Specific policies governing personal trading, gifts, outside interests, and other conflict-related matters

7. MONITORING AND REVIEW

Our Compliance Officer continuously monitors the effectiveness of our conflicts management framework through:

- Regular audits of compliance records and the Conflict of Interest Register
- Review of employee disclosures and implementation of management actions
- Analysis of reported conflicts and their resolutions
- Assessment of employee trading activities and outside interests
- Annual policy review and updates to reflect best practices and regulatory requirements

8. ENFORCEMENT

Violations of our conflicts of interest policies may result in disciplinary action, up to and including termination of employment. The severity of action depends on the nature of the violation, its impact on Trustyfi and our clients, and any previous violations.

We encourage employees to report potential policy violations without fear of retaliation. Whistleblower protections are enforced to ensure that individuals reporting concerns in good faith are safeguarded from adverse consequences.

9. REGULATORY COMPLIANCE

Our conflicts of interest management framework is designed to comply with:

- Polish Act on Virtual Assets
- EU Markets in Crypto-Assets Regulation (MiCA)
- Anti-Money Laundering and Counter-Terrorist Financing regulations
- GDPR and data protection requirements

10. CLIENT RIGHTS AND REMEDIES

If you believe that a conflict of interest has adversely affected your interests:

- You may request additional information about the conflict and how it was managed
- You may file a complaint through our official complaints procedure
- You may seek review of any transactions or services affected by the conflict
- You have the right to escalate concerns to relevant regulatory authorities

Trustyfi is committed to operating with the highest standards of integrity and transparency. This Conflict of Interest Disclosure reflects our dedication to protecting client interests and maintaining trust in all our business relationships.