



# Bitcoin Suisse

## 1 Regulatory Notice

### 1.1 Bitcoin Suisse AG

#### 1.1.1 Company Information

Bitcoin Suisse AG  
Grafenauweg 12  
6300 Zug, Switzerland  
[contact@bitcoinsuisse.com](mailto:contact@bitcoinsuisse.com)  
CHE-472.481.853  
LEI: 5299004GII7NEZFIFE28  
VAT: CHE-325.527.905

As a client of the company, you maintain a legal relationship with Bitcoin Suisse AG. If you deposit fiat currencies with us or withdraw them from us, your transaction will be processed by our fully owned company WhiteAlp GmbH.

WhiteAlp GmbH  
Grafenauweg 12  
6300 Zug, Switzerland  
UID: CHE-404.797.925  
LEI: 529900UYTIRS8NU6G891  
VAT: CHE-998-831.24

#### 1.1.2 Competent Supervisory Authority

The company is registered (registration no. 100072) with and supervised by the Self-Regulatory Organization (SRO) "Verein zur Qualitätssicherung von Finanzdienstleistungen" (VQF) in the area of Anti-Money Laundering (AML) and Counter Financing of Terrorism (CFT) regulations. VQF is recognized and supervised by the Swiss Financial Market Supervisory Authority (FINMA). [For more information about the supervisory status of the company, reference is made to the FINMA website](#) (Search: "SRO financial intermediary").

Verein zur Qualitätssicherung von Finanzdienstleistungen (VQF)  
General-Guisan-Strasse 6  
6300 Zug, Switzerland  
[info@vqf.ch](mailto:info@vqf.ch)  
[www.vqf.ch](http://www.vqf.ch)

#### 1.1.3 Default Guarantee for Certain Public Deposits

While the majority of client crypto assets are held in fully segregated custody, the company has arranged a default guarantee issued by a Swiss cantonal bank with a state guarantee to cover certain liabilities towards clients that are considered public deposits under applicable laws and regulations. For more information about the default guarantee, reference is made to

the [General Terms and Conditions](#) and the client-specific Guarantee Statement that we provide you with in BTCS Online or through your Relationship Manager.

#### 1.1.4 Client Advisor Registration Body

Relationship Managers of our company who provide financial services on behalf of the company in accordance with the Financial Services Act (FinSA) are registered as client advisors with BX Swiss AG, a registration body recognized and supervised by FINMA.

BX Swiss AG  
Talacker 50  
8001 Zurich, Switzerland  
[office@regservices.ch](mailto:office@regservices.ch)  
<https://www.regservices.ch/en/home/>

#### 1.1.5 Complaints Handling and Mediation

We are committed to working with you to resolve your issue related to financial instruments. If we cannot reach a mutual agreement, you have the option to contact our Ombudsman FINOS. Finanzombudsstelle Schweiz (FINOS) is an ombudsman recognized by the Federal Department of Finance (FDF).

Finanzombudsstelle Schweiz (FINOS)  
Talstrasse 20  
8001 Zurich, Switzerland  
[info@finos.ch](mailto:info@finos.ch)  
<https://www.finos.ch>

You should firstly direct your complaint to the company and demand an answer in writing. If no answer is received or if the financial institution's answer is unsatisfactory, you can approach the ombudsman in person, in writing or by means of electronic communication. For more information on the conciliation procedure, reference is made to the [dedicated webpage of FINOS](#).

#### 1.1.6 Client Segmentation

Under FinSA, clients of financial service providers are categorized into three segments: retail clients, professional clients, and institutional clients. This segmentation ensures tailored regulatory protection based on individual financial circumstances, knowledge, experience, or the size and professional treasury of a company, as legally defined.

Retail clients typically include natural persons and small to medium-sized enterprises, while professional and institutional clients often comprise large companies, pension funds, and financial intermediaries. The level of investor protection varies according to the segmentation. Retail clients benefit from the highest level of protection, while institutional clients have the lowest.

You may have the option to move between segments under certain conditions ("opting"), which will affect the range of products available to you and your level of investor protection.

“Opting-in” offers greater regulatory protection, whereas “opting-out” provides less regulatory protection. For further details, please contact your Relationship Manager.

#### *1.1.7 Information on the Services and Products*

##### **Overview**

The company mainly provides services of custody and safekeeping, trading and brokerage, (liquid) staking, and collateralized lending in connection with crypto assets. Custody services are either provided based on a fully segregated or a pooled account. Where necessary, the company may accept fiat currency deposits from its clients.

##### **Crypto Assets and Token Classification**

The company may provide services to its clients, such as custody of crypto assets and staking, or offer crypto assets that are generally not considered financial services or financial instruments within the meaning of FinSA.

According to [current supervisory practice](#), FINMA provides for three types of tokens: “Payment tokens” function as digital means of payment and are generally not considered securities and are therefore not financial instruments; “utility tokens” are designed to grant access to a specific application or service, which are also excluded from securities law and FinSA unless they have an investment purpose; “asset tokens” represent assets like equity, debt, or derivatives, and are typically treated as securities and financial instruments. In addition, FINMA has also issued [guidance on how stablecoins are treated under Swiss financial market regulations](#).

##### **Financial Services**

The company may offer financial services to its clients, in particular the acquisition and disposal of crypto assets that may qualify as financial instruments (art. 3 lit. c let. 1 FinSA). The company does **not** provide personal advice or investment recommendations to its clients. **Neither** does the company provide portfolio management services.

##### **Client’s Rights and Obligations**

Your rights and obligations that arise in the context of a service are defined in the [General Terms and Conditions](#) and, where applicable, in the respective individual agreements. In connection with trading and brokerage services, you can also rely on the standards set forth in the [Best Execution Policy](#).

#### *1.1.8 Information on Risks*

##### **Overview**

Crypto assets and services related to them involve opportunities and risks. Some crypto assets that are part of the Bitcoin Suisse Token Universe may qualify as financial instruments within the meaning of FinSA. Financial instruments may involve risks that are different from non-financial instruments.

It is important that you are familiar with, and understand, these risks before making use of our services, including financial services within the meaning of FinSA.

##### **Crypto Assets**

The brochure [Special Risks of Crypto Assets](#) provides comprehensive information on the risks associated with crypto assets. We strongly advise you to review this material thoroughly before entering into any transaction. Clients should bear in mind that many crypto assets are still considered novel innovative products with a high-risk profile that may result in a **total loss** of your investment or holding. In addition, services that the company provides in connection with crypto assets may present novel risks of their own, such as software bugs and the failure of the underlying crypto-economic incentive scheme. Should you have any questions, please do not hesitate to reach out to your Relationship Manager.

### **Financial Instruments**

Regarding crypto assets that are financial instruments, reference is also made to the Swiss Bankers Association's brochure [Risks Involved in Trading Financial Instruments \(version June 2023\)](#).

### **Additional Risk Disclosure**

The risks that are specific to a service or product offered by the company are described in the [General Terms and Conditions](#) and, where applicable, in the respective individual agreements.

#### *1.1.9 Information on Costs*

### **Overview**

Depending on the service provided to clients, the company charges either one-time (e.g. brokerage) or recurring fees and commissions (e.g. custody and staking). The costs charged to clients can be verified in the account statements.

### **Fees and Commissions**

As a rule, the use of the company's services and products entails financial costs for clients. The standard fees and commissions for our services can be accessed via our [Support Center](#).

In connection with the provision of services, including financial services, Bitcoin Suisse AG, affiliated companies or third parties may incur costs. These costs may either be directly charged to your account or be deducted from the revenue or profit of an investment or activity.

Before concluding the respective service or product agreement, you will receive the applicable **Fee Schedule**, and any changes to that fee schedule will be communicated to you in accordance with the [General Terms and Conditions](#).

In addition to the positions listed in the Fee Schedule, further costs, fees and commissions, taxes, or other charges may apply.

Your Relationship Manager will be happy to give you an overview of your personal costs and charges.

### **Value-Added Tax (VAT)**

Certain services provided by the company may be subject to VAT for individuals with tax residency in Switzerland or the Principality of Liechtenstein.

## Dormant Assets

It may occur that the company loses contact with a client, such as when the client does not react to phone calls, e-mails, mails, and other communications. Such a situation may result in the assets held at the company becoming dormant. In such cases, the standard fees and charges previously agreed with the client will continue to apply (and may be debited to the client's dormant account). Additionally, the company may charge the client, or its legal successors or heirs, for any reasonable costs incurred for investigations, as well as for the special handling and monitoring of dormant assets.

### 1.1.10 Market Offer

#### Overview

The company does not issue its own crypto assets or financial instruments. Crypto assets are generally issued by computer software in a decentralized manner. Where crypto assets are issued in a centralized fashion, the company may have a legal relationship with the issuer or its affiliated parties.

#### Internal Standards

The company has established internal standards and procedures to decide on the onboarding to the Bitcoin Suisse Token Universe and their offboarding. Crypto assets that do not meet the standards will not be onboarded and therefore not be available to our clients. When onboarding new crypto assets, the company will act in accordance with its internal regulations on handling conflicts of interest.

#### Execution-Only

The company does **not** provide personal advice or investment recommendations to its clients. The company solely executes or transmits the client's orders and instructions. It is therefore the client who decides on whether a specific crypto asset is acquired or disposed of, or a specific service offered by the company is used. An overview of the available crypto assets can be accessed in BTCS Online or through your Relationship Manager.

### 1.1.11 Handling of Conflicts of Interest

#### Overview

As a provider of a wide range of services, the company may encounter actual or potential conflicts of interest in the course of its activities. These may arise from one or more of the following situations:

- The company's relationship with its clients.
- Competing interests between two or more clients as well as between clients and the company's employees, including in their position as clients.
- The company's involvement in the issuance or sponsorship of products, including financial instruments and indices/benchmarks.
- The company's relationship with its vendors or other third-party service providers.

## Identification and Management

Conflicts of interest may arise in circumstances where the company acts in multiple capacities, providing various products and services to different parties. The company employs robust measures to identify, prevent or mitigate these situations, for example:

- Employees of the company are required to disclose, monitor, and report any conflicts of interest that involve themselves, the company and/or a client. These disclosures are maintained and monitored.
- The company implements strict governance rules for managing relationships with third-party service providers.

## Resolution and Disclosure

In cases where conflicts of interest cannot be avoided or fully resolved, the company discloses them in a clear and transparent manner. This disclosure is tailored to ensure the affected client can understand the potential impact on their interests. The company remains committed to conducting its business in a manner that aligns with both its own values and the best interests of its clients.

If you have any questions or concerns regarding conflicts of interest, please do not hesitate to contact your Relationship Manager.

## Third-Party Benefits and Best Execution

The company offers its clients a wide range of services and products and may receive remuneration from third-party providers and business partners based on agreements independent of individual client relationships. Such remuneration compensates the company for services, such as:

- Conducting operational activities.
- Maintaining and adapting IT and other infrastructure to meet client needs.
- Providing financial instruments and necessary product documentation.

The company may also receive **benefits** from third parties or grant such benefits to them, in particular for the introduction of prospects and new clients.

Benefits can be monetary (e.g., introducer fees) or non-monetary (e.g., training sessions for client advisors, market analyses). Receiving and granting benefits may lead to conflicts of interest for the company, its employees, members of the board of directors, or shareholders. The company takes reasonable steps to avoid such conflicts of interest or mitigate any disadvantage to the client.

The company does **not** receive any kickbacks, rebates or similar monetary or non-monetary benefits in return for routing trade orders to a particular execution venue. The company may use trade volume-based pricing offered by the execution venues, which, however, does not affect the way a client trade order is routed. Further information on how the company intends to execute a client's trade orders can be found in the [Best Execution Policy](#).

#### *1.1.12 No Appropriateness or Suitability Assessment (All Clients)*

When solely executing or transmitting client orders (execution-only), financial service providers are not required to conduct an appropriateness or suitability assessment (art. 13 para. 1 FinSA). **In accordance with art. 13 para. 2 FINSA, Bitcoin Suisse hereby notifies its clients that it will not perform an appropriateness or suitability assessment prior to providing financial services or offering financial instruments or related transactions to clients.** This means that the company will not take into account the client's knowledge and experience with regard to a specific financial service or financial instrument and/or the client's financial situation and investment objectives and strategy.

#### *1.1.13 Non-Applicability of FINSA Code of Conduct Provisions (Institutional Clients)*

When providing financial services for institutional clients as defined by the FinSA, the code of conduct provisions outlined in the second chapter of the FinSA, including those related to appropriateness and suitability assessments, do not apply to the business relationship between the client and the company (art. 20 para. 1 FinSA).