CROSS-BORDER FINANCIAL SERVICES TERMS & DISCLOSURES

Operational Framework, Reverse Solicitation & Partner Execution

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1. EXECUTION BY REGULATED FINANCIAL PARTNERS

1.1. All money transfers, currency conversions, virtual IBAN issuances, and digital asset exchanges initiated via topsend.live are processed strictly and exclusively by duly licensed Regulated Financial Partners (including MSBs, EMIs, and VASPs).
1.2. Certech Borrow s.r.o. acts solely as an technical interface (SaaS UI) and does not hold or control client funds at any time.

2. REVERSE SOLICITATION & CROSS-BORDER DISCLOSURE

2.1. **Reverse Solicitation:** By requesting access to financial rails via topsend.live, Users explicitly confirm that services are requested at their own exclusive initiative and volition.
2.2. **Regulatory Jurisdictions:** Financial services are rendered pursuant to the specific licenses of the processing Regulated Financial Partners and are not rendered under local licenses where not required.

3. TRANSACTION FINALITY, RATES & SLIPPAGE

3.1. **Irreversibility:** Due to automated blockchain consensus protocols and interbank clearing rules, confirmed transfer orders are **final and non-refundable** once transmitted to processing rails.
3.2. **FX Rates & Slippage:** Exchange rates are provided dynamically via partner APIs. Users accept potential market slippage during volatility.

4. CANCELLATION & REFUND FRAMEWORK

Refunds are only available if a transaction is rejected by a Regulated Financial Partner during compliance screening before execution. Processing fees charged by intermediary banking rails are non-refundable.

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