

**WYOMING STABLE TOKEN COMMISSION
PRIVACY POLICY**

Adopted on August 4, 2025

Version 1.0.0.

1. INTRODUCTION.

- 1.1. The Wyoming Stable Token Commission (the “**Commission**”) is a governmental agency established under W.S. § 40-31-103 and is the issuer of the Wyoming Stable Token (“**WYST**”). As a governmental agency, the Commission is subject to the Wyoming Public Records Act at W.S. §16-4-201 through 205 (“**WPRA**”).
- 1.2. The following Privacy Policy (“**Policy**”) is intended to explain the information that the Commission will gather and retain pursuant to its operations and outline how the Commission collects, uses, and protects the personal information and data of WYST users.

2. PUBLIC RECORDS ACT.

- 2.1. The WPRA governs how and when governmental entities in Wyoming release records in response to record requests. The WPRA also governs the type of records that must be released, may be released at the agency’s discretion, and which cannot be disclosed (W.S. §16-4-203(a)-(b), (d)). The WPRA governs only those records for which the Commission is a custodian (W.S. §§ 16-4-201(a)(i), 16-4-203(a)).

3. PURPOSE & SCOPE.

- 3.1. This Policy outlines how the Commission collects, uses, discloses, and protects the personal information and data of WYST users.
- 3.2. The Policy applies to information collected through the Commission’s operating systems relating to the issuance and redemption of WYST. The Policy reflects the Commission’s obligations to adopt data policies as a state entity under Wyoming law (W.S. § 9-21-101), as well as any applicable Federal data protections.

4. INFORMATION COLLECTION PRACTICES.

- 4.1. The Commission does not collect personally identifiable information (“**PII**”) from WYST users. The only instances in which PII is obtained are when it is provided by License Service Providers¹ (“**LSP**”) pursuant to law enforcement requests,

¹ “Licensed Service Provider” or “LSP” means any entity which has executed an agreement with the Commission to offer or support the purchase and sale of WYST on its platform or application, following a compliance review that

court orders, or other legal actions involving the transfer of tokens. In these cases, PII is typically obtained from the LSP's or law enforcement entities with which the Commission collaborates.

- 4.2. However, the Commission may collect non-PII, such as on-chain addresses associated with WYST user transactions. When users engage in commercial transactions using the tokens, they effectively agree to make such transactional information public, which enables the Commission to attribute certain addresses to specific users.
- 4.3. The Commission may also collect information from LSP's, including financial records, on-chain addresses, trade secrets, and certain PII of key executives and owners. LSP's must provide this information as part of the approval process to list WYST. Once approved, LSPs remit dollars to the Commission, which in turn issues WYST to the LSPs. In this structure, the Commission's counterparties are primarily the LSP's involved in these transactions. For end users of WYST, the Commission only sees limited information such as date, time, and transaction addresses—some of which may be identifiable, while others are not.

5. USE AND DISCLOSURE OF INFORMATION.

- 5.1. Use and Disclosure of Information by the Commission is governed by the WPRA. Information collected by the Commission is used primarily for law enforcement purposes or other legal actions, or in response to public records requests. Data shared voluntarily by an LSP is utilized primarily in the context of compliance and enforcement. The Commission maintains a partnership with external third parties and other state agencies to assist in investigations and conduct web scans for detecting scams or fraudulent activity.
- 5.2. PII may also be collected directly from users in certain instances—for example, when an LSP ceases to operate and the Commission redeems tokens directly from affected individuals. In such cases, those individuals become end users from whom PII is collected.
- 5.3. The Commission shares information with law enforcement agencies, and typically only under a court order or as otherwise required by law. All such law enforcement-related disclosures are carried out in accordance with constitutional protections and due process requirements. If the Commission receives a WPRA request for which any such data is responsive, the Commission will consider the exceptions of Wyo. Stat. Ann. §16-4-203(a)-(b) and (d) when determining whether it may or must disclose that information pursuant to the request.

includes at a minimum the successful completion of “Know Your Business” checks or other compliance requirements deemed necessary by the Commission.

6. ENFORCEMENT AND FREEZING AUTHORITY.

6.1. The Commission generally does not take enforcement action absent a legal order. However, it may act based on publicly available information where there is a strong indication of illicit activity. The Director and Commission Staff retain authority to freeze tokens based on reasonable suspicion of illicit activity supported by public evidence.

7. DATA RETENTION.

7.1. The Commission adheres to Wyoming State Archives' Records Retention Schedule (W.S. §§ 9-2-405 through 9-2-413).

8. DATABASES.

8.1. Information related to the operation of databases is retained until it is deemed obsolete, then it is destroyed. This means that data collected is retained for the duration of its relevancy. Once data is no longer relevant to the operations of the Commission or no longer relevant to the partnership with a particular LSP or end user, the Commission will destroy the data. One example of data becoming obsolete is the termination of a partnership with an LSP or end user.

9. INCIDENT MANAGEMENT.

9.1. Data pertaining to incidents involving property or assets follow a different schedule. For purposes of incident and risk management, certain information is retained for ten (10) years following the termination of the Commission's relationship with an LSP. "Termination" is defined as the point at which the Commission's relationship with the LSP formally ends, which may occur when an LSP no longer lists the Token.

10. CHANGES TO THIS PRIVACY POLICY.

10.1. The Policy is subject to change by the Commission. Revisions are likely to reflect changes in applicable laws or changes in the Commission's policies. Users are entitled to notice about changes to the Policy. Any changes to the Policy will be reflected by a change in the "Last Updated" line at the top of the Policy. Major changes to the Policy will be posted on the Commission's website at <https://stabletoken.wyo.gov>.

11. CONTACT US.

11.1. Should you have any inquiries about this Policy, please reach out to stabletoken@wyo.gov.

DOCUMENT HISTORY

ORIGINAL SUBMISSION				
SUBMITTED ON	SUBMITTED BY	APPROVED BY	APPROVED BY DATE(S)	EFFECTIVE DATE
August 4, 2025	Exec. Director Anthony Apollo	Wyoming Stable Token Commission	August 4, 2025	August 4, 2025

REVISIONS				
REVISION DATE	REVISED BY	APPROVED BY	APPROVED BY DATE(S)	EFFECTIVE DATE

REVIEWS		
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